

---

# CITY OF WARREN, OHIO

## 2023 ACTION PLAN



This Page Intentionally Left Blank

# Executive Summary

## AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

### 1. Introduction

As required by the US Department of Housing and Urban Development (HUD), the Action Plan indicates the goals in which the funds are anticipated to be expended during January 01, 2023 through December 31, 2023.

The City of Warren and Warren Consortium currently receive the following funds:

- Community Development Block Grant (CDBG): the federal government has designated the City of Warren as an entitlement community
- HOME Investment Partnership (HOME): the City of Warren and Trumbull County are together recognized as a participating jurisdiction (the Warren-Trumbull HOME Consortium), with the City of Warren operating as lead agency in the provision of funding for affordable housing programs and development

### 2. Summarize the objectives and outcomes identified in the Plan

The Jurisdiction's main objective is to provide for the needs of the LMI and underserved population of the community.

The demographics of the community (approximately 50% of the population are under 18 or over 65 years of age) show a need for both youth and senior services. The goal is to provide the needed services to assist with Homeless, Youth, Elderly, and other special needs projects.

With the age, condition, and real estate values of the housing stock in targeted neighborhoods it becomes more and more costly to rehabilitate and perform the needed lead abatement with the limited funds available. It is the Jurisdiction's intent to provide decent affordable housing to those in need by leveraging additional funding through non-profit partners, agencies, and governmental services.

The City of Warren has a major problem with aging infrastructure. Replacement and/or reconstruction of the City's streets, sidewalks, sewer, and water lines are ongoing and costly. The aim of the Jurisdiction is to assist in providing a suitable living environment for those living in the targeted area of the city.

The underserved LMI population has a higher unemployment rate. The Jurisdiction's objective will be to make the needed efforts to attract new businesses or grow existing ones in order to provide job opportunities. The creation of jobs will increase the wealth and economic vitality of those targeted populations.

Approximately 18% of the population in the statistical area has some type of mental, physical, and/or learning disability. The special needs populations in the jurisdiction tend to be underemployed and

chronically homeless. It is the goal of the jurisdiction to eliminate homelessness and provide a Continuum of Care by supporting emergency, transitional and permanent supportive housing.

### **3. Evaluation of past performance**

The jurisdiction will continue to make progress towards carrying out its five year strategic plan and in meeting HUD's National Objectives. Because CDBG and HOME funds are limited - a significant effort is being made to use these grant dollars to leverage funds from other sources. Some highlights in the third year of the current Consolidated Plan include:

The City has completed various projects including: Economic Development Projects - Technical Assistance and Small Business Loans by using CDBG Funds; Public Infrastructure Projects - Street Resurfacing and the demolition of Commercial/Residential structures using CDBG Funds; Public Service Projects - Assistance to various Non-Profit Organizations that assist Homeless, Elderly, Youth, Fair Housing, and Other (assistance with meals for homebound individuals; temporary shelter for domestic violence victims; help providing food, clothing, furnishings to underprivileged individuals) Programs using CDBG Funds; and Affordable Housing and Housing Stability Projects - Property Maintenance, Emergency Home Repairs, Downpayment Assistance, Housing Rehabilitation (Homeowner and Rental) using CDBG and HOME Funds.

### **4. Summary of Citizen Participation Process and consultation process**

The Jurisdiction consults on a regular basis with non-profit and government agencies that provide services to LMI population.

The Citizen Participation process is ongoing through the year. This process includes Public Meetings, Public Comment Sessions, meetings with neighborhood associations, and citizen surveys.

The Jurisdiction also uses a Citizens Committee appointed by both the Mayor and City Council to review all proposals on an annual basis.

### **5. Summary of public comments**

No Public Comments were received.

### **6. Summary of comments or views not accepted and the reasons for not accepting them**

No Public Comments were received.

### **7. Summary**

The City of Warren's Strategic Plan or Consolidated Plan is a collaborative process through which communities identify housing and community development needs and establish goals, priorities, and strategies to measure progress.



The Jurisdiction continues to do a good job in meeting its goals and performs well considering budget restrictions and the current economic climate.

The Jurisdiction uses consultations and need survey assessments from its non-profit and government agencies dealing with the needs of LMI population and input from citizens through public meetings, surveys, and its citizen committee.

## **PR-05 Lead & Responsible Agencies – 91.200(b)**

### **1. Agency/entity responsible for preparing/administering the Consolidated Plan**

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
Lead Agency	WARREN	
CDBG Administrator	WARREN	Community Development Department
HOME Administrator	WARREN	Community Development Department

**Table 1 – Responsible Agencies**

### **Narrative (optional)**

The City of Warren Community Development Department, appointed by the Mayor of the City of Warren, is the lead agency in the preparation of this Consolidated Plan. The Community Development Department focuses on creating strong and vibrant neighborhoods through collaborative efforts with other city departments, government offices, non-profit and private organizations. The department also administers a wide range of community-based programs with the objective of improving economic opportunities and housing conditions within the city, as well as creating and maintaining partnerships with citizens and affiliated agencies to provide an array of proactive, responsive, and people-oriented service. Federally distributed funds constitute the majority of money available to the department in any given year; additional funds to support specific projects (often street, sewer, or other infrastructure improvements) are obtained through state and federal grants as well as private funding and foundation resources. Expenditures of each program administered by the Community Development Department are governed by a budget recommended by the Citizen Review Committee, approved by Warren City Council, and adopted by City Council Ordinance.

### **Consolidated Plan Public Contact Information**

All questions, comments, and requests for additional information should be addressed to:

Michael D. Keys, Director, Warren Community Development Department, 258 E. Market St., Suite 305, Warren, OH 44481. Telephone Number: (330) 841-2565.

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

**Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))**

The City of Warren is part of the Trumbull County Housing Collaborative which was established to coordinate and develop services. The Collaborative consists of representatives from over 50 public, private, and non-profit agencies with a common goal of providing a continuum of care to these individuals and families especially those with special needs.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The Trumbull County Housing Collaborative was established to coordinate and develop services and housing for homeless individuals and low-income persons needing housing assistance. The Collaborative consists of representatives from more than 50 public, private and non-profit agencies within the common goal of providing a continuum of care for these individuals and their families. Since 1998, the Collaborative has met on a regular basis to discuss housing needs, organize supportive programs and facilities, and address gaps present in the system.

The Collaborative has embarked upon a Continuum of Care planning process, in which input from service and housing providers coordinate available programs and facilities to identify gaps in the system. Where gaps exist, the Consortium develops and supports proposals to meet needs through funding for new services or housing facilities.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

Not Applicable, we do not receive ESG Funds.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	City of Warren Health District
	<b>Agency/Group/Organization Type</b>	Housing Services-Health Health Agency Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs Economic Development Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of Warren Community Development Department consults with the City of Warren Health District about their concerns, and/or suggestions pertaining to Critical Issues, Unmet Needs/Gaps, and/or Services. They continue to state that the City of Warren's aged housing population presents an obvious concern to the local Public Health District and the well-being of our children. Their inspections/investigations are a tool to determine living arrangements and the abatement processes of any lead issues. Homeowners with housing code compliance (including lead issues) are forwarded to the Community Development department to see if they are eligible for any of our housing programs.
3	<b>Agency/Group/Organization</b>	Warren City Engineering, Planning and Building Department
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Natural Hazard Resiliency
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of Warren Community Development Department consults with the City of Warren Engineering Department pertaining to Floodplain regulations, Thermal and Explosive Hazards, and/or Manmade Hazards prior to moving forward on any projects to ensure the project will not be influenced or cause adverse effects to the surrounding areas.

**Identify any Agency Types not consulted and provide rationale for not consulting**

Not Applicable

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Trumbull County Housing Collaborative	Assessing the needs and developing solutions to address the housing needs of the homeless and special needs populations.

**Table 3 – Other local / regional / federal planning efforts**

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

Individual participants, including policy and program stakeholders, civic and community leaders, professionals, and concerned residents were solicited to attend Citizen Participation meetings when we prepared the 2020-2024 Consolidated Plan. During these meetings, Community Development staff reviewed current data, programs, and objectives with those present, collected feedback and then established recommendations regarding strategies for the five year Consolidated Plan. The Annual Action Plan follows the goals established in the 2020-2024 Consolidated Plan.

The Citizen Participation Plan is included in the Grantee Unique Appendices section.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Citizens Committee Meeting	Citizens Committee and 2023 Funding Applicants	On September 21, 2022 the Citizens Committee met with Public Service Applicants to ask questions pertaining to their applications. Upon reviewing all applicants, the committee selects projects to be funded with the 2023 CDBG Grant Funds (limited to 15% for Public Service). The committee also reviews and approves other general purpose projects and their funding for the upcoming year.	The outcome of this meeting was a list of 9 CDBG Public Service Projects; 10 CDBG General Purpose Programs; and 6 HOME categories for various programs to be funded in 2023.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Non-targeted/broad community	On March 28, 2023 the City published an advertisement in the Trumbull County Legal News seeking comments from citizens on the 2023 Action Plan. The comment period will run from March 28, 2023 thru April 27, 2023. The plan and comment form will be provided electronically on the City's website ( <a href="http://www.warren.org">www.warren.org</a> ) and to anyone who requests them via email.	No Public Comments were received.	No Public Comments were received.	
3	Public Meeting	Non-targeted/broad community	Public Comment Sessions will be held on April 27, 2023 @ noon and 4:00 pm.	No Public Comments were received.	No Public Comments were received.	

**Table 4 – Citizen Participation Outreach**



## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

The jurisdiction will be anticipating approximately \$6,256,000 in Block Grant funding and \$3,555,000 in HOME dollars for the five year period of the plan. Providing the current funding is maintained, we may see an overage of HOME funding received based on the anticipated grant funding amount. The jurisdiction does not anticipate receiving any ESG or HOPWA funds.

2023 CDBG Grant # B-23-MC-39-0022

2023 HOME Grant # M-23-DC-39-0202

## Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,171,297	45,500	0	1,216,797	1,277,372	2023 Annual Allocation based on HUD Notice dated February 27, 2023. Program Income is Estimated based on prior years.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	813,262	175,443	0	988,705	252,154	2023 Annual Allocation based on HUD Notice dated February 27, 2023. Program Income is the amount that was received in 2022 and receipted in 2023.

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The City continues to look to ensure that its funds are used wisely to bring the most benefit to the targeted areas and low-income residents that we serve.

It is the policy of the Community Development Department to look more favorably upon funding requests that will use these federal dollars in conjunction with, or as leverage to, additional revenues sources for that particular project or program.

The City has successfully accessed state transportation funds, natural resource funds, tax credits etc., under this policy and will continue exercising such diligence in approving any project for funding.

In addition, all applications for assistance from non–profits are required to exhibit a budget sheet showing other private and/or public sources of revenue to best serve their clientele.

All housing projects other than home owner repair and/or down payment assistance must identify source of match funds prior to commitment of the Participating Jurisdiction. In addition, housing projects being undertaken by nonprofit housing organizations, i.e. Youthbuild, Trumbull Neighborhood Partnership, CHDOs, etc. are asked to demonstrate other sources of funding both monetary and in-kind in order to access federal funds.

**If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

In addition to public parks and park facilities, the City owns less than 15 acres that are former brownfield sites or are in some phase of environmental assessment/mitigation. These sites are being marketed as economic development opportunities for businesses that offer job opportunities for low-moderate people.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Grant Administration	2020	2024	Administration	CITY WIDE TARGET AREA CDBG TARGET AREA HOME TARGET AREA	Community Services and Facilities Economic Development Housing and Homeless Services Public Improvements	CDBG: \$243,359 HOME: \$139,030	Other: 2 Other
2	Economic Development	2020	2024	Non-Housing Community Development	CITY WIDE TARGET AREA CDBG TARGET AREA	Economic Development	CDBG: \$156,999	Businesses assisted: 106 Businesses Assisted
3	Public Infrastructure Improvements	2020	2024	Non-Housing Community Development	CITY WIDE TARGET AREA CDBG TARGET AREA	Public Improvements	CDBG: \$616,439	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 51505 Persons Assisted Buildings Demolished: 5 Buildings

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Public Services	2020	2024	Non-Housing Community Development	CITY WIDE TARGET AREA CDBG TARGET AREA	Community Services and Facilities	CDBG: \$100,000	Public service activities other than Low/Moderate Income Housing Benefit: 54518 Persons Assisted Homeless Person Overnight Shelter: 300 Persons Assisted
5	Affordable Housing and Housing Stability	2020	2024	Affordable Housing Public Housing	CITY WIDE TARGET AREA HOME TARGET AREA	Housing and Homeless Services	CDBG: \$100,000 HOME: \$849,675	Rental units constructed: 4 Homeowner Housing Rehabilitated: 11 Household Housing Unit Direct Financial Assistance to Homebuyers: 2 Households Assisted Housing Code Enforcement/Foreclosed Property Care: 1300 Household Housing Unit

**Table 6 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Grant Administration
	<b>Goal Description</b>	General planning and overall management of HUD-funded activities performed by the Warren City Community Development Department.
2	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	<p>A lagging economy and unemployment rates that run between three and four percentage points higher than that of the county, state, and nation require continued public investment to stimulate local job creation. To combat declining tax revenues and promote a business-friendly atmosphere, and in order to remain competitive on national, state, and regional levels, the City of Warren will continue to utilize financial and non-financial incentives to attract and retain businesses that are moving or expanding.</p> <p>Small business development has traditionally been a major contributor to the economic base of the City of Warren and Trumbull County. Low-interest loans and tax abatement policies allow companies to reinvest and expand, increasing competitiveness in the local business climate.</p> <p>As a result, the City of Warren will utilize CDBG funds to:</p> <ul style="list-style-type: none"> <li>• Pursue the location of smaller manufacturing and service firms to the City of Warren to stabilize the local employment base, including the creation of marketing materials which will be made available at the Chamber of Commerce, Convention and Visitors Bureau, trade fairs, and other locations where potential firms can be reached;</li> <li>• Promote increased employment levels for relocating companies, and those already located within the City of Warren;</li> <li>• Expand funding for existing programs providing technical assistance to interest parties, including one-on-one consultations and seminars in which residents and citizens can learn more about starting a business in the City of Warren;</li> <li>• Develop relationships with local, regional, and state economic development representatives, utilizing local and state tax credits to encourage business investment, site location, or project types targeted for development;</li> <li>• Make continual improvements to the City of Warren's economic base, including (but not limited to) industrial park development, roadway improvements, land acquisition, the promotion of private investment, and state and federal facility recruitment;</li> <li>• Set aside funding to develop and expand tax reinvestment districts, with projects that include (but are not limited to): accessibility improvements for disabled individuals, building acquisition and rehabilitation, business recruitment, facade restoration, land acquisition, parking and pedestrian enhancements, and infrastructure improvements; and</li> <li>• Increase participation in City loan programs, including (but not limited to): Revolving Loan Fund, Mini-Loan Fund, and CDBG Section 108 Loan Program;</li> <li>• Target small businesses, both at start-up and expansion phases, that face limitations in accessing debt and equity financing and make at least \$40,000 per year over the next five years available to the City loan portfolio, ensuring the growth of its capital base and making it available to future borrowers; and</li> <li>• Fill market gaps for those businesses considered a risk by larger commercial lenders and encourage those financial institutions which do not currently participate in City loan programs to do so.</li> </ul> <p>Business expansion and retention programs will be measured by the number of businesses visited, surveyed, and assisted in location or expansion; number of jobs created and/or retained; the cost per job created and/or retained; rate of hire for low- and moderate-income residents; economic diversification; and improved business perceptions of local government.</p> <p>Loan Programs will be measured by the number of businesses assisted and the number of jobs created and/or retained.</p>

3	<b>Goal Name</b>  <b>Goal Description</b>	<b>Public Infrastructure Improvements</b>  Rebuilding the physical infrastructure of a community improves the local business climate and is often critical to the redevelopment of distressed neighborhoods. Programs to build roads and decent sidewalks, provide water and waste removal, other public infrastructure services, and capital improvement projects provide substantial economic benefits, including job creation and business retention. <ul style="list-style-type: none"> <li>• Provide funding for street resurfacing, sidewalk, and other 'streetscaping' projects within the Target Area neighborhoods;</li> <li>• Provide funding for Residential and/or Commercial Demolition projects within the Target Area neighborhoods;</li> <li>• Provide funding for the construction or restoration of recreational facilities either unavailable or under-represented in Target Area Parks, replace deteriorated play equipment and amenities including benches, tables, and waste receptacles;</li> <li>• Continue funding for the Warren Riverwalk, including improvements to the Warren Community Amphitheater, Downtown Trailhead, and connections to the Lake-to-River Greenway Trail;</li> <li>• Set aside CDBG funding to seek outside sources of funding for other needed Target Area infrastructure improvements.</li> </ul> <p>It should be noted that the benefits of infrastructure improvements are often not realized immediately, and should be evaluated after an appropriate period of time has passed. Once project have been completed and are integrated into the community, their success may be measured through the number of jobs created and/or retained, the amount of investment generated the number of new businesses created, condition of roads and transportation services, improved access, and community perception.</p> <p>Parks, open space, and recreational facilities are economic necessities for urban areas. Many factors influence the decision of a company or an individual to move into or out of a city, and quality of life is a major consideration for both.</p>
---	---	--

4	<b>Goal Name</b>  <b>Goal Description</b>	<b>Public Services</b>  <p>The City will assist with Public Service Projects that offer Homeless Support, Youth Services, Elderly Services, Transportation, and other HUD approved Public Service Activities within the City.</p> <p><b>Homeless Support</b></p> <p>Adequate housing and services for transient and homeless individuals is considered to be the most important need in both the City. High priority populations include homeless persons, victims of domestic violence, physically and mentally disabled individuals, persons suffering from AIDS and other diseases, and disaster victims who are stranded or in need of temporary shelter.</p> <p>The City will use CDBG funds to support the operation of permanent supportive housing and transitional housing facilities; and encourage better tracking mechanisms to coordinate support for homeless and at-risk individuals who are assisted by social service agencies, as well as emergency, transitional, and permanent housing facilities throughout Trumbull County. Progress can be tracked by the number of individuals served and placed in emergency, transitional, or permanent supportive housing, amount of funding programmed towards the construction of supportive housing facilities, and number of facilities built and occupied.</p> <p><b>Youth Services</b></p> <p>Young people require support, guidance, and the opportunity for education, recreation, and service throughout their adolescence. Supervised programs and recreational/educational activities can help young individuals develop a sense of self-assurance, encouraging social contribution, community activity, and control over their future.</p> <p>The City will use CDBG funds to provide funding for programs that support intervention in the lives of area low- and moderate-income youth, emphasizing education and social responsibility over recreation. Progress can be tracked by the number of youth served.</p> <p><b>Elderly Services</b></p> <p>As population in the City continues to age, the provision of social services for elderly residents enables hundreds of older individuals to maintain their dignity and independence.</p> <p>The City will use CDBG funds to support programs that provide significant numbers of low- and moderate-income seniors with services including (not limited to) in-home services, home-delivered meals, and transportation. Progress can be tracked by the number of seniors served.</p> <p><b>Transportation</b></p> <p>Public transportation programs make it possible for individuals who do not or are not able to drive to perform critical tasks, including medical appointments, business errands, and shopping activities. Only one fixed-route transportation system currently operates in the City; to maintain and improve this service, the City will utilize CDBG funds to continue to provide support for those programs offering transportation options to low- and moderate-income residents. Progress can be tracked by the number of low- and moderate-income riders served and the number of routes running through Target Area neighborhoods.</p> <p><b>Other Public Service</b></p> <p>The City will continue to support those public services provided by local non-profit organizations to low- and moderate-income residents, as well as those special needs persons.</p> <p>The need for neighborhood service programs to complement non-profit and private organizations continues to rise, resulting in serious competition for CDBG resources. Direct program grants are limited by a cap on public service funding. The City will maintain a certain amount of funding for public service programs, though at a level which permits infrastructure and development projects to receive funding priority through the CDBG Program. All services which further the city's goal of promoting community organizations and renewal will be considered.</p>
---	---	--



5	<b>Goal Name</b>	Affordable Housing and Housing Stability
	<b>Goal Description</b>	<p>The Warren/Trumbull HOME Consortium will continue to assist low to moderate income persons with Emergency Home Repairs, Homeownership Down payment Assistance, and Multi-Family and Single-Family Housing Repairs and/or New Construction within the CDBG and HOME Target Areas.</p> <p><b>Emergency Home Repair Program</b></p> <p>Many low- to moderate-income householders (particularly seniors) are not able to perform routine maintenance on their homes, and cannot always afford to make needed structural repairs; these services are essential to preserve the existing housing stock and delay disrepair due to lack of resources. In order to combat the deterioration of owner-occupied, single-family homes the City of Warren will utilize CDBG funds to continue providing program funding toward emergency rehabilitation projects for eligible single-family homeowners.</p> <p>The success of the Emergency Home Repair program can be measured in number of applications taken, the number of projects completed per year, the level of maintenance five years after project completion, and the length of the homeowner's stay once the project has been completed.</p> <p><b>Owner-Occupied Housing Rehabilitation Program</b></p> <p>A declining population combined with new housing construction in suburban communities frequently leads to disinvestment in older urban housing stock. Additionally, deferred maintenance of these units increases the rehabilitation cost of a structure, at times in excess of its value. The City of Warren will utilize CDBG funding to continue providing funding to programs geared toward the preservation of existing housing units, rather than allowing these structures to become abandoned, deteriorate, and develop into hazardous sites that blight residential neighborhoods.</p> <p><b>Homeownership Program</b></p> <p>The homeownership loan program is meant to assist low to moderate income persons with down payment assistance on mortgage loans. Eligible borrowers can receive a deferred loan of \$5,000 towards down payment and/or closing costs to purchase a home. Local participating lenders will finance the remaining balance for up to 30 years at the current fixed real estate loan rates.</p> <p>To ensure participation in the above mentioned programs brochures are available and distributed to eligible program applicants via church bulletins, local service provider sites, shopping/gathering places, and the City of Warren's website.</p> <p><b>Multi-Family and Single-Family Housing</b></p> <p>The City of Warren as lead agency for the Warren-Trumbull HOME Consortium will continue to use HOME Program funds and Program Income to rehabilitate and construct housing units that are affordable to low- and moderate-income households. This includes independent, assisted, supportive and transitional housing for the elderly and group homes for disabled persons.</p>

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The Jurisdiction uses consultations and assessment surveys from its non-profit and government agencies dealing with the needs of LMI population and input from citizens through public meetings, surveys, and its citizen committee in the decision making process.

Due to recent economic conditions funding opportunities from both the private sector and foundations have been severely limited. Thus, the plan of action is to continue to work with partnering agencies to get the most benefit from the limited funding available to serve the needs of the LMI population in the community. Increased attention will be paid to homelessness issues and to those dealing with underserved youth.

#### Projects

#	Project Name
1	Program Administration
2	Economic Incentives and Loans
3	Capital Improvements
4	Public Services
5	Fair Housing Compliance
6	Multi-Family and Single-Family Housing

**Table 7 - Project Information**

#### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Allocation priorities are based on citizen input and collaboration with non-profit partners and agencies. The obstacle to addressing underserved needs in the jurisdiction is that those needs exceed the funding availability - both in direct funds from Federal sources, such as the Community Development Block Grant and HOME, and in the ability to leverage private and foundation dollars which have been limited by the economic conditions in the area.

**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	Program Administration
	<b>Target Area</b>	CITY WIDE TARGET AREA HOME TARGET AREA
	<b>Goals Supported</b>	Grant Administration
	<b>Needs Addressed</b>	Economic Development Public Improvements Community Services and Facilities Housing and Homeless Services
	<b>Funding</b>	CDBG: \$243,359 HOME: \$139,030
	<b>Description</b>	Program Administration funds the operation of the Community Development Department in overseeing the projects set forth within the City of Warren. (HOME Admin \$98,367 / HOME CHDO Admin \$40,663)
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Administration activities do not complete the objective and outcome sections.
	<b>Location Description</b>	Administration activities do not complete the objective and outcome sections.
	<b>Planned Activities</b>	Management and oversight of the department's financial and administrative duties.
<b>2</b>	<b>Project Name</b>	Economic Incentives and Loans
	<b>Target Area</b>	CITY WIDE TARGET AREA
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$156,999
	<b>Description</b>	These funds will allow the City to enter into Professional Service Contracts for community and economic development activities and will be used for Loans to new and/or expanding businesses in the City of Warren.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Will vary depending on how many businesses are assisted.
	<b>Location Description</b>	Various areas within the City of Warren.

	<b>Planned Activities</b>	Technical Assistance and Loans for new and/or existing businesses in the City of Warren.
<b>3</b>	<b>Project Name</b>	Capital Improvements
	<b>Target Area</b>	CDBG TARGET AREA CITY WIDE TARGET AREA
	<b>Goals Supported</b>	Public Infrastructure Improvements
	<b>Needs Addressed</b>	Public Improvements
	<b>Funding</b>	CDBG: \$616,439
	<b>Description</b>	These funds will be used for streets and sidewalks that are located within the CDBG Target Area; will be utilized in City Parks; will be used for the demolition and clean-up of blighted properties located in the City of Warren; and will be used to match grants and make infrastructure improvements in the City.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Capital Improvement projects will benefit the City as a whole.
	<b>Location Description</b>	Various locations within the City of Warren
<b>4</b>	<b>Planned Activities</b>	These funds will be used for streets and sidewalks that are located within the CDBG Target Area; will be utilized in City Parks; will be used for the demolition and clean-up of blighted properties located in target areas in the City of Warren; and will be used to match grants and make infrastructure improvements in the City.
	<b>Project Name</b>	Public Services
	<b>Target Area</b>	CITY WIDE TARGET AREA
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Community Services and Facilities
	<b>Funding</b>	CDBG: \$92,000
	<b>Description</b>	These funds will provide funds to various public service organizations to assist with various programs that assist low-to-moderate income individuals (to include homeless, homebound/limited mobility, youth, and elderly).
	<b>Target Date</b>	12/31/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	3,313 low-to-moderate income individuals (to include homeless, homebound/limited mobility, youth, and elderly).
	<b>Location Description</b>	Various Locations within the City of Warren.
	<b>Planned Activities</b>	Assistance with providing wooden ramps and minor home modifications for individuals that have mobility issues; Short-term emergency shelter for homeless individuals, fulfilling their need for shelter, food, and safety while assisting in seeking employment, permanent housing, and sharpening their skill sets; Home Delivery of meals to low-income seniors and disabled individuals that struggle with daily food/nutritional needs; Provide food, clothing, and furnishings the underprivileged; Summer Enrichment Program that provides a combination of academics, athletics, nutrition, cultural, and other fun activities focused on decreasing summer learning loss for City of Warren Youth; Assistance to high school aged youth in facilitating access to college, career/technical fields (including apprenticeships), military service, and/or directly into the workforce; Monthly food delivery to homebound seniors; and Assistance to Warren City Residents to overcome employment barriers, such as lack of drivers license or reliable transportation, ability to pass drug screens, lack of professionalism, and lack of skills credentials.
5	<b>Project Name</b>	Fair Housing Compliance
	<b>Target Area</b>	CITY WIDE TARGET AREA
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Community Services and Facilities
	<b>Funding</b>	CDBG: \$8,000
	<b>Description</b>	Assist the City in compliance with Fair Housing Laws as required by HUD.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	51,505 Warren City Residents - this is an Area Wide Benefit
	<b>Location Description</b>	Various locations within the City of Warren
	<b>Planned Activities</b>	Assistance with compliance of Fair Housing issues.
6	<b>Project Name</b>	Multi-Family and Single-Family Housing
	<b>Target Area</b>	CITY WIDE TARGET AREA HOME TARGET AREA
	<b>Goals Supported</b>	Affordable Housing and Housing Stability

	<b>Needs Addressed</b>	Housing and Homeless Services
	<b>Funding</b>	CDBG: \$100,000 HOME: \$849,675
	<b>Description</b>	CDBG Funds will be used to assist homeowners with emergency home repairs needed to correct a health and/or safety threat within the CDBG Target Area; will assist with the costs of property maintenance code investigators in the City Health Department working within the CDBG Target Area. HOME Funds will be used to: assist moderate income families to become home owners; assist in low- to moderate-income owner occupied housing rehabilitation projects; and assist with single-family and/or multi-family construction projects. All HOME Funds (including CHDO Reserve \$121,989) are for projects that are within the HOME Consortium Target Area.
	<b>Target Date</b>	12/31/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	17 LMI Families/Households
	<b>Location Description</b>	
	<b>Planned Activities</b>	<p>CDBG:</p> <p>Emergency repairs such as heating systems, hot water heaters, severe roof damage, etc.; Assist with the costs of Property Maintenance Code investigators in the City Health Department working within the CDBG Target Area.</p> <p>HOME:</p> <p>Down payment Assistance for single-family homebuyers (must be owner-occupied, not applicable for rental properties); Owner Occupied Housing Rehabilitation projects; and Multi-Family construction and/or rehabilitation projects. All HOME Funds are for projects that are within the HOME Consortium Target Area.</p>

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

During the next year, housing and development efforts will continue to be directed towards those neighborhoods within the City of Warren where 51.3% of residents are considered to have low- to moderate-income. Low– income persons are those individuals who earn less than 50 percent of the area median family income (MFI) as determined by the most recent U.S. Census; similarly, moderate-income households are those which earn less than 80% percent MFI.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
CITY WIDE TARGET AREA	49
CDBG TARGET AREA	51
HOME TARGET AREA	100

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The allocation of investments is based on the following factors: level of need; citizen input; recommendations of consulting partners and housing organizations; ability to leverage other funding sources; matching funds; long range viability of project.



# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

### Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	17
Special-Needs	0
Total	17

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	4
Rehab of Existing Units	11
Acquisition of Existing Units	2
Total	17

**Table 10 - One Year Goals for Affordable Housing by Support Type**

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

Trumbull Metropolitan Housing Authority (TMHA) provides decent, safe and sanitary housing for low- to moderate-income families unable to secure housing needs on the open market. TMHA currently operates 1,249 public housing units throughout Trumbull County serving approximately 2,350 low- and moderate income residents. In addition, participants in Section 8 New Construction and TMHA administered Housing Choice Voucher programs make up over 2,800 tenants in 1098 units.

### **Actions planned during the next year to address the needs to public housing**

According to the PHA Five Year Action Plan, TMHA goals include:

- PHA GOAL #1: EXPAND THE SUPPLY OF ASSISTED HOUSING
- PHA GOAL #2: IMPROVE THE QUALITY OF ASSISTED HOUSING
- PHA GOAL #3: INCREASE ASSISTED HOUSING CHOICES
- PHA GOAL #4: PROVIDE AN IMPROVED LIVING ENVIRONMENT
- PHA GOAL #5: F-SUFFICIENCY AND ASSET DEVELOPMENT OF ASSISTED HOUSEHOLDS
- PHA GOAL #6: L-OPPORTUNITY AND AFFIRMATIVELY FURTHER FAIR HOUSING

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The Trumbull Metropolitan Housing Authority has not been classified as a troubled PHA, no action is required.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

**Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

**Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Point in time counts will be conducted by the Trumbull Housing Collaborative as outlined in the Blueprint to End Homelessness.

**Addressing the emergency shelter and transitional housing needs of homeless persons**

The Jurisdiction will address the needs of the homeless population by funding both emergency and transitional housing and will continue to work with those agencies that offer educational and counseling services through the Trumbull County Housing Collaborative.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The City of Warren is part of the Trumbull County Housing Collaborative which was established to coordinate and develop services. The Collaborative consists of representatives from over 50 public, private, and non-profit agencies with a common goal of providing a continuum of care to these individuals and families.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The jurisdiction will provide grant funding next year to non-profit agencies for the following activities: short-term housing for the homeless; meal delivery to homebound individuals; emergency shelter; provide clothing, food, and household goods to LMI individuals in need; educational mentoring, tutoring, sports, arts and recreation programs for youth; delivery of groceries including fresh produce and non-perishables to homebound seniors.

## **Discussion**

The Trumbull County Housing Collaborative uses a Continuum of Care – a service delivery model where homeless families and individuals move from step to step along the continuum until they reach permanent housing.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

Zoning and subdivision regulations in the City of Warren are not a source of obstruction to the construction or rehabilitation of housing units; in addition, the Trumbull County subdivision code presents no barrier to affordable housing development or maintenance.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

#### **Actions planned to address obstacles to meeting underserved needs**

During the next year, housing and development efforts will continue to be directed towards those neighborhoods within the City of Warren where 51.3% of residents are considered to have low- to moderate-income. Low-income persons are those individuals who earn less than 50 percent of the area median family income (MFI) as determined by the most recent U.S. Census; similarly, moderate-income households are those which earn less than 80% percent MFI.

#### **Actions planned to foster and maintain affordable housing**

The City of Warren is committed to the on-going goals of providing decent, safe, affordable housing and to improving the quality of life for all residents. The City will increase homeownership rates; support short term emergency shelters for local homeless individuals and pursue the expansion of a supportive housing network for those low- and moderate-income homeowners; and reduce the number of abandoned and dilapidated structures that blight neighborhoods and endanger residents.

#### **Actions planned to reduce lead-based paint hazards**

The City continues to implement HUD regulations for the identification and removal of lead based paint hazards in housing. Lead inspection, testing, risk assessment, resident notification and clearance have all been implemented into the housing programs and are performed by Mahoning County Lead Task Force. These activities have reduced the number of housing units with lead paint hazards and provide low to moderate income persons the availability of safe decent housing.

#### **Actions planned to reduce the number of poverty-level families**

CDBG and HOME resources are targeted towards supporting those very low- and low-income households in their search for services. Additional funding resources will be sought to allow existing agencies and organizations to continue/expand programs which minimize the number of households living below poverty. The Consortium will work to end discrimination in the housing industry through its continued support of the housing education, outreach, and credit counseling programs.

The Consortium will also coordinate with local CHDO(s) and area social service providers to see to the housing needs of very low- and low-income clients. This would include Owner-Occupied Rehabilitation, Homeownership, and housing education and outreach programs. Prevention of housing discrimination, especially in minority households and those female-headed households with children is a priority.

## **Actions planned to develop institutional structure**

Implementation of the Consolidated Plan through this Annual Action plan will rely on the concerted efforts of a consortium of public and non-profit agencies, service providers, and the community at-large. Key organizations include the Warren Community Development Department, Trumbull County Planning Commission, Trumbull County Metropolitan Housing Authority, Warren Redevelopment and Planning Inc., Paragon Residential Solutions Corp., Trumbull Housing Collaborative, Community Legal Aid Fair Housing, Eastgate Council of Governments, Mahoning Valley Economic Development Corporation, Trumbull County Workforce Board, Greater Warren Youngstown Urban League, Trumbull County Mental Health and Recovery Board, Wean Foundation, Family & Community Services, Youngstown State University, Minority Business Assistance Center, Trumbull Neighborhood Partners, and others.

## **Actions planned to enhance coordination between public and private housing and social service agencies**

Public participation and civic cooperation are fundamental elements of all successful housing and community development practice. In order to assemble a useful and action-oriented plan that assists residents, particularly those individuals of low- or moderate-income and those with specific housing and supportive service needs, the Community Development Department developed a consultation program between policy and program stakeholders, civic and community leaders, professionals, and department staff.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction:

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

#### HOME Investment Partnership Program (HOME)

##### Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

We do not expect to use any other forms of investments other than deferred payment loans and/or grants.



2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

As a condition of the deferred loan, the borrower agrees to remain the title holder and principal occupant of the home during the affordability period. The period of affordability is based upon the direct HOME subsidy provided to the borrower and is outlined below. A Promissory Note is signed and a lien is placed on the property for the total amount of HOME funds allocated. This lien will remain in place during the affordability period. Once the terms have been met, a Satisfaction of Mortgage is done and the lien is released. If the borrower fails to meet the terms of the agreement the City will impose the recapture requirement as established under the HOME rule 92.254(a)(5).

During the affordability period, the full amount of the note will become due if the property is sold, transferred or no longer the principal place of residence. The PJ will recapture the entire amount of the subsidy provided before the homebuyer receives a return. (Recapture amount to be limited to only the net proceeds from the sale). The terms of recapture are outlined in both the written Mortgage Agreement and the Promissory Note signed by the buyer.

Minimum Affordability Periods (Funds Provided Per Unit - Minimum Period of Affordability):

Less than \$15,000 - 5 Years

\$15,000 to \$40,000 - 10 Years

Over \$40,000 - 15 Years

New Construction - 20 Years

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

As a condition of the deferred loan, the borrower agrees to remain the title holder and principal occupant of the home during the affordability period. The period of affordability is based upon the direct HOME subsidy provided to the borrower and is outlined below. A Promissory Note is signed and a lien is placed on the property for the total amount of HOME funds allocated. This lien will remain in place during the affordability period. Once the terms have been met, a Satisfaction of Mortgage is done and the lien is released. If the borrower fails to meet the terms of the agreement the City will impose the recapture requirement as established under the HOME rule 92.254(a)(5).

During the affordability period, the full amount of the note will become due if the property is sold, transferred or no longer the principal place of residence. The PJ will recapture the entire amount of the subsidy provided before the homebuyer receives a return. (Recapture amount to be limited to only the net proceeds from the sale). The terms of recapture are outlined in both the written Mortgage Agreement and the Promissory Note signed by the buyer.

Minimum Affordability Periods (Funds Provided Per Unit - Minimum Period of Affordability):

Less than \$15,000 - 5 Years

\$15,000 to \$40,000 - 10 Years

Over \$40,000 - 15 Years

New Construction - 20 Years

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

We do not expect to include refinancing as part of our multi-family rehabilitation projects.



## Attachments

CITIZEN PARTICIPATION PLAN  
City of Warren Department of Community Development  
258 E. Market Street, Suite 305, Warren, OH 44481



### Introduction

The City of Warren is a participating entitlement jurisdiction with the U.S. Department of Housing and Urban Development (HUD) in receiving funds through the Community Development Block Grant (CDBG) and Home Investments Partnership Program (HOME). As such, citizens, public agencies and other interested parties are guaranteed a role in the development and review of plans and performance reports and, further, shall have access to certain records and technical assistance. As a condition of receiving this funding the City must satisfy annual planning and reporting requirements as provided in 24 CFR Part 91 which includes the development and preparation of a five-year Consolidated Plan, An Annual Action Plan for each year of the Con Plan, the Consolidated Annual Performance Evaluation Report (CAPER) and an Assessment of Fair Housing.

### Encouragement of Citizen Participation

The City of Warren will seek and encourage:

- citizens, public agencies and other interested parties to participate in the development and review of the Consolidated Plan and its amendments, Annual Plan, Environmental Review Record and Consolidated Annual Performance and Evaluation Report.
- participation by low- and moderate-income persons living in slum and blighted areas and in areas where CDBG & HOME funds are proposed to be used and residents of predominantly low- and moderate-income neighborhoods.
- participation of all citizens of the City, including minorities and non-English speaking persons, as well as persons with disabilities.
- Participation of local and regional institutions including civic organizations, councils of government (COG), planning agencies, philanthropic institutions, businesses, developers, non-profit organizations, and other community-based organizations
- participation and consultation with adjacent local governments, especially Trumbull County which receives HOME funds along with the City as part of the Trumbull Warren HOME Consortium.
- participation and consultation with the Trumbull Metropolitan Housing Authority (TMHA). The City and TMHA will share information regarding activities related to the developments of public and assisted housing as well as targeted revitalization areas in which the developments are located.
- participation and consultation with public and private agencies that provide assisted housing, health and human services, fair housing, and services for children, veterans, youth, elderly, persons with disabilities, and their families.
- participation and consultation with the Continuum of Care and regular meetings with the agency as it relates to homelessness issues.

Any Public hearings will be held in venues accessible for those with disabilities. Upon request non-English speaking residents' needs may met in the case of a public hearing where a significant number of non-English speaking residents can be reasonably expected to participate and where practical.

### **Citizen Advisory Committee**

The objective and purpose of the Citizen Advisory Committee (CAC) of the City of Warren shall primarily be to review grant applications for CDBG & HOME funding and make recommendations to the Mayor and City Council regarding the implementation of CDBG and HOME funded programs.

The Citizens Advisory Committee shall consist of the following:

- Three members of City Council appointed to the Community Development Committee by the President of Council at the beginning of each term.
- The Mayor of the City of Warren.
- Six citizens appointed by Council's Community Development Committee members.
- Six citizens appointed by the Mayor.

### **Program Funding**

The CAC shall meet annually to make recommendations to Warren City Council regarding CDBG and HOME funding for the upcoming program year.

The City, via public meetings, written notifications, Warren City Council meetings, and media announcements, will solicit proposals for funding and have two public meetings to provide the following:

- The total amount of CDBG funds available to the City for all eligible activities.
- The range of activities that may be undertaken and the kind of activities previously funded.
- The application process to be followed.
- The role of citizens in the program and process.
- A summary of other important program requirements.
- Date, time and place of meeting with the CAC.
- Place to obtain additional information and assistance.

The applications shall be due to the City's Community Development Department at least thirty (30) days prior to the CAC meeting date. The purpose of this time frame is to give the CAC and CD staff sufficient time to review the applications. In evaluating each application, the CAC shall use the following criteria:

- eligibility of the activity under CDBG
- compliance with the CDBG national objective
- consistency with priorities and specific objectives established in the Consolidated Plan
- prior experience with CDBG
- Prior experience in the community
- prior experience in the type of project/activity being proposed
- organization administrative and financial capacity to carry out the proposed activity.

## **Five Year Consolidated Plan**

The Consolidated Plan is a five-year strategic plan which describes the needs and goals for the community development and housing programs. This allows the City to apply for Federal funding and make annual application for entitlement funds for CDBG and HOME programs.

Prior to adoption of a Five-Year Consolidated Plan, the City shall conduct public meetings with interested citizens, agencies and/or groups and at least one public hearing prior to the submission of the Five-Year Consolidated Plan.

Public meetings may be held at selected sites convenient and accessible to the residents of the City of Warren with particular emphasis on participation by low- and moderate-income residents to encourage the submission of views and recommendations prior to the formulation of the Consolidated Plan.

Surveys will be provided at public meeting and be made available on the City's website for feedback from interested citizens, agencies, and/or groups.

Prior to submission to HUD, notice will be given that a draft of the Consolidated Plan is available for review. Copies of the Consolidated Plan for review will be made available at the Community Development offices and on the City's website at [www.warren.org](http://www.warren.org).

Notice shall be made stating that a draft of the Consolidated Plan is available for review. This will provide a thirty (30) day period for review and to receive comments from interested citizens, groups and/or agencies on the proposed Consolidated Plan. The City shall consider any comments or views of citizens, agencies and/or groups received in writing and/or orally at the public hearing in preparation of the final Consolidated Plan. A summary of comments and views received and a summary of comments and views not accepted and the reasons therefore, shall be attached to the final Plan. Public Comment forms will be made available at all meetings and online at [www.warren.org](http://www.warren.org).

Any Public hearings will be held in venues accessible for those with disabilities. Upon request non-English speaking residents' needs may be met in the case of a public hearing where a significant number of non-English speaking residents can be reasonably expected to participate and where practical.

## **Annual Plan**

This plan is prepared each year and identifies the amount of funding the City expects to receive from HUD as well as anticipated program income. It describes the activities and projects expected to be undertaken in the subject year to address the needs and priorities that have been identified by the City and citizen input. The CAC will make recommendations to the Council of funding allocations. Upon approval of City Council, staff in the Community Development Department will prepare the Annual Plan for the current year. Any amendments to the Consolidated Plan will also be included in the submission of the Annual Plan to HUD for review and approval.

Prior to submission to HUD, notice will be given that a draft of the Annual Plan is available for review. This will provide a thirty (30) day period for review and to receive comments from interested citizens, groups, and/or agencies on the proposed Annual Plan and any Consolidated Plan amendments. The City shall consider any comments or views of citizens, agencies and/or



groups received in writing and/or orally at the public hearing in preparation of the final Annual Plan. A summary of comments and views received and a summary of comments and views not accepted and the reasons therefore, shall be attached to the final Annual Plan. Public Comment forms will be made available at all meetings and online at [www.warren.org](http://www.warren.org).

Any Public hearings will be held in venues accessible for those with disabilities. Upon request non-English speaking residents' needs may be met in the case of a public hearing where a significant number of non-English speaking residents can be reasonably expected to participate and where practical.

### **Consolidated Annual Performance & Evaluation Report (CAPER)**

This is an annual report of what the City completed in the most recent program year. The purpose of the CAPER is to provide HUD with necessary information to assess the City's ability to carry out its programs in compliance with applicable regulations and requirements; provide information necessary for HUD to report to Congress; and, provide the City with an opportunity to describe its program achievements to its interested citizens, agencies, and/or groups.

Notice shall be made stating that a draft of the CAPER is available for review. This will provide a fifteen (15) day period for review and to receive comments from interested citizens, agencies, and groups on the proposed CAPER. The City shall consider any comments or views of citizens, agencies and/or groups received in writing and/or orally in preparation of the final CAPER. A summary of comments and views received and a summary of comments and views not accepted and the reasons therefore, shall also be attached to the final CAPER. Public Comment forms will be made available at all meetings and online at [www.warren.org](http://www.warren.org).

Any Public hearings will be held in venues accessible for those with disabilities. Upon request non-English speaking residents' needs may be met in the case of a public hearing where a significant number of non-English speaking residents can be reasonably expected to participate and where practical.

### **Assessment of Fair Housing**

Using a prescribed format, the City must identify fair housing issues and related contributing factors to its jurisdiction and set goals to overcome fair housing impediments.

The City, in partnership with its Fair Housing partner, Trumbull County, will provide regional trainings and informational meeting for all parties that deal with Fair Housing issues i.e. realtors, zoning inspectors, landlords, government officials, etc. The City will also distribute educational materials throughout the community as well as on the City website at [www.warren.org](http://www.warren.org).

The City shall also maintain a Fair Housing Commission comprised of citizens appointed by the Mayor and approved by City Council. The Commission will meet twice per year to review Fair Housing policies, procedures, impediments, complaints, and share public input.

The City and County will hold a minimum of two public hearings in the year an update of the fair housing assessment and analysis is performed in order to gather public input and citizen comments.



The City will consider the following as significant material changes that would require a substantial revision to the Affordable Fair Housing Plan: significant demographic changes, significant policy changes, civil rights findings, HUD notifications, and/or Presidentially declared disasters.

Any Public hearings will be held in venues accessible for those with disabilities. Upon request non-English speaking residents' needs may be met in the case of a public hearing where a significant number of non-English speaking residents can be reasonably expected to participate and where practical.

### **Plan Amendments**

Prior to making any additions, deletions, or changes to the Community Development Block Grant Program Consolidated Plan, one of the following determinations will be made on the amendment:

- the proposed change is a Minor Amendment if the amendment to the program is less than 10% of the total current year grant and only affects an activity previously described in the Consolidated Plan and Annual Plans.
- the proposed change is a Substantial Amendment when the following applies:
  - a) the amendment makes changes in its allocation priorities or a change in the method of distribution of funds;
  - b) the amendment carries out an activity, using funds from any program covered by the consolidated Plan (including program income), not previously described in the action plan; or
  - c) the amendment changes the purpose, scope, location or beneficiaries of an activity.

Once a determination has been made, based on the above criteria, one of the two following procedures will be undertaken:

- Minor Amendment: The staff of the Community Development Department make the necessary revisions with input and approval of the Mayor and/or Council which will then be noted in the Annual Plan.
- Substantial Amendment: The staff of the Community Development Department will, pursuant to the Community Development Block Grant Regulations (24 CFR 91.105 and 24 CFR Part 570), undertake the following amendment process for any proposed substantial amendment to the Consolidated Plan:
  - a) provide a reasonable notice of public hearing on the proposed amendment to the Consolidated Plan.
  - b) a public notice shall be given at least thirty (30) days prior to the public hearing and provide a description of the amendment, allowing citizens, agencies and/or groups the opportunity to comment on the proposed amendment. Public Comment forms will be made available at all meetings and online at [www.warren.org](http://www.warren.org).
  - c) consider interested citizens, agencies and/or groups' comments when finalizing the proposed amendment.

d) seek input from the Citizen Advisory Committee on the proposed activity(ies) which comprise the proposed amendment; and seek subsequent approval from the City Council.

e) forward a descriptive amendment to the Consolidated Plan on the adopted amendment with a signed transmittal letter signed by the Mayor to the HUD.

Any Public hearings will be held in venues accessible for those with disabilities. Upon request non-English speaking residents' needs will be met in the case of a public hearing where a significant number of non-English speaking residents can be reasonably expected to participate, where practical.

Changes that do not require Council approval and may be approved only by the Community Development Department are minor amendments such as:

- minor additions or changes of the scope of services in a contract which is not a substantial amount of allocated funds which would require a contract amendment and not a line item change.
- extensions to the time of performance of approved activities.
- change of language in an executed contract for an approved activity.

### **Technical Assistance Offered to Facilitate Citizen Participation**

Assistance shall be provided to citizen organizations, groups of low/moderate income persons, groups of residents in existing neighborhood target areas, and nonprofit agencies who provide a service to low- and moderate-income individuals.

Assistance may be provided to citizens in organizing and operating neighborhood and project area organizations to carry out CDBG activities.

Requests for assistance shall be made to the Community Development Department specifying the type of assistance required and the reasons for assistance.

The extent of assistance offered shall be determined by the Mayor and Council.

The Mayor, City Council, and the Community Development Department of the City shall generally not overextend staff or budgets when offering assistance.

Technical assistance may be either provided directly by the City or through arrangements with public, private or non-profit entities.

### **Program Recommendations, Requests, & Objections**

Recommendations, requests and/or objections maybe submitted to the Community Development Department for consideration from interested citizens, agencies and/or organizations at any time during the program year.

Written responses, if requested, shall be made to recommendations, requests and/or objections within thirty working days after a determination

Whenever practical recommendations, requests, and/or objections should be made prior to the end of the comment period as stated in the legal notice on the development of the

Consolidated Plan, Annual Plan, and/or Consolidated Annual Performance and Evaluation Report.

Written recommendations, requests and/or objections not offered at officially called meetings shall be addressed to the Director of Community Development at:

258 E. Market Street  
Suite 305  
Warren OH 44483

### **Availability of Records**

All plans and performance reports, as well as other information, are available for inspection on the Community Development Page on the City website at [www.warren.org](http://www.warren.org) or at the Community Development Department located at 258 E. Market Street, Suite 305 between the hours of 7:30 am and 4:00 pm during normal working days.

### **Special Note**

During times of special circumstance such as Natural Disasters, Natural Emergencies, and/or Pandemics, which are deemed beyond the reasonable control of HUD entitlement grantees, HUD may waive certain requirements and regulations pertaining to its affected grantees. In such cases, the requirements and regulations governing the City of Warren's Citizen Participation Plan could be adjusted and require temporary modifications. During those times, the City of Warren will evaluate and utilize all necessary HUD waivers/notifications which would allow for the temporary modification of the Citizen Participation Plan with the express focus of retaining and obtaining critical federal funds.

## Grantee SF-424's and Certification(s)

OMB Number: 4040-0004  
Expiration Date: 11/30/2025

Application for Federal Assistance SF-424		
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>
<b>* 3. Date Received:</b> <input type="text"/>	<b>4. Applicant Identifier:</b> <input type="text" value="39-0022"/>	
<b>5a. Federal Entity Identifier:</b> <input type="text" value="39-0022"/>		<b>5b. Federal Award Identifier:</b> <input type="text" value="B-23-MC-39-0022"/>
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> <input type="text"/>	<b>7. State Application Identifier:</b> <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> <input type="text" value="City of Warren, Ohio"/>		
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> <input type="text" value="34-6002974"/>	<b>* c. UEI:</b> <input type="text" value="JNXQEAY4MH35"/>	
<b>d. Address:</b>		
<b>* Street1:</b> <input type="text" value="391 Mahoning Ave NW"/> <b>Street2:</b> <input type="text"/> <b>* City:</b> <input type="text" value="Warren"/> <b>County/Parish:</b> <input type="text" value="Trumbull"/> <b>* State:</b> <input type="text" value="OH: Ohio"/> <b>Province:</b> <input type="text"/> <b>* Country:</b> <input type="text" value="USA: UNITED STATES"/> <b>* Zip / Postal Code:</b> <input type="text" value="44483-4604"/>		
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> <input type="text" value="Community Development"/>		<b>Division Name:</b> <input type="text"/>
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> <input type="text" value="Mr."/>	<b>* First Name:</b> <input type="text" value="Michael"/>	
<b>Middle Name:</b> <input type="text" value="D."/>		
<b>* Last Name:</b> <input type="text" value="Keys"/>		
<b>Suffix:</b> <input type="text"/>		
<b>Title:</b> <input type="text" value="Director of Community Development"/>		
<b>Organizational Affiliation:</b> <input type="text"/>		
<b>* Telephone Number:</b> <input type="text" value="330-841-2565"/>		<b>Fax Number:</b> <input type="text" value="330-841-2643"/>
<b>* Email:</b> <input type="text" value="mkeys@warren.org"/>		

<b>Application for Federal Assistance SF-424</b>		
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="C: City or Township Government"/>		
Type of Applicant 2: Select Applicant Type: <input type="text"/>		
Type of Applicant 3: Select Applicant Type: <input type="text"/>		
* Other (specify): <input type="text"/>		
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U.S. Department of Housing and Urban Development"/>		
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14.218"/> CFDA Title: <input type="text" value="Community Development Block Grant - Entitlement Grant"/>		
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="B-23-MC-39-0022"/> * Title: <input type="text" value="Community Development Block Grant (CDBG) - Entitlement Grant"/>		
<b>13. Competition Identification Number:</b> <input type="text" value="N/A"/> Title: <input type="text"/>		
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <div> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>		
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="Projects listed in our 2023 ACTION Plan"/>		
Attach supporting documents as specified in agency instructions. <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>		



Application for Federal Assistance SF-424	
<b>16. Congressional Districts Of:</b>	
* a. Applicant <input style="width: 60px;" type="text" value="OH-017"/>	* b. Program/Project <input style="width: 60px;" type="text" value="OH-017"/>
Attach an additional list of Program/Project Congressional Districts if needed. <div style="display: flex; justify-content: space-between; align-items: center;"> <input style="width: 150px; height: 20px;" type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div> </div>	
<b>17. Proposed Project:</b>	
* a. Start Date: <input style="width: 60px;" type="text" value="01/01/2023"/>	* b. End Date: <input style="width: 60px;" type="text" value="12/31/2023"/>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	<input style="width: 100px;" type="text" value="1,171,297.00"/>
* b. Applicant	<input style="width: 100px;" type="text" value="0.00"/>
* c. State	<input style="width: 100px;" type="text" value="0.00"/>
* d. Local	<input style="width: 100px;" type="text" value="0.00"/>
* e. Other	<input style="width: 100px;" type="text" value="0.00"/>
* f. Program Income	<input style="width: 100px;" type="text" value="45,500.00"/>
* g. TOTAL	<input style="width: 100px;" type="text" value="1,216,797.00"/>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b> <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input style="width: 60px;" type="text"/> . <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <div style="display: flex; justify-content: space-between; align-items: center;"> <input style="width: 150px; height: 20px;" type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div> </div>	
<b>21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)</b> <input checked="" type="checkbox"/> ** I AGREE <small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
<b>Authorized Representative:</b>	
Prefix: <input style="width: 60px;" type="text" value="Mr."/>	* First Name: <input style="width: 150px;" type="text" value="William"/>
Middle Name: <input style="width: 150px;" type="text" value="D."/>	
* Last Name: <input style="width: 150px;" type="text" value="Franklin"/>	
Suffix: <input style="width: 60px;" type="text"/>	
* Title: <input style="width: 100px;" type="text" value="Mayor"/>	
* Telephone Number: <input style="width: 100px;" type="text" value="330-841-2602"/>	Fax Number: <input style="width: 100px;" type="text"/>
* Email: <input style="width: 150px;" type="text" value="dfranklin@warren.org"/>	
* Signature of Authorized Representative:	* Date Signed: <input style="width: 60px;" type="text" value="03/21/23"/>

### ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

Previous Edition Usable

Authorized for Local Reproduction

Standard Form 424B (Rev. 7-97)  
Prescribed by OMB Circular A-102

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Warren, Ohio	03/21/23

Standard Form 424B (Rev. 7-97) Back



# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

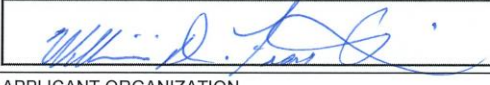
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

Previous Edition Usable

Authorized for Local Reproduction

Standard Form 424D (Rev. 7-97)  
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Warren, Ohio	03/21/23

SF-424D (Rev. 7-97) Back

Application for Federal Assistance SF-424			
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
		* If Revision, select appropriate letter(s): <input type="text"/>	
		* Other (Specify): <input type="text"/>	
* 3. Date Received: <input type="text"/>		4. Applicant Identifier: <input type="text" value="39-0022"/>	
5a. Federal Entity Identifier: <input type="text" value="39-0202"/>		5b. Federal Award Identifier: <input type="text" value="B-23-DC-39-0202"/>	
<b>State Use Only:</b>			
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>			
* a. Legal Name: <input type="text" value="City of Warren, Ohio"/>			
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="34-6002974"/>		* c. UEI: <input type="text" value="JNXQEAY4MH35"/>	
<b>d. Address:</b>			
* Street1:	<input type="text" value="391 Mahoning Ave NW"/>		
* Street2:	<input type="text"/>		
* City:	<input type="text" value="Warren"/>		
* County/Parish:	<input type="text" value="Trumbull"/>		
* State:	<input type="text" value="OH: Ohio"/>		
* Province:	<input type="text"/>		
* Country:	<input type="text" value="USA: UNITED STATES"/>		
* Zip / Postal Code:	<input type="text" value="44483-4604"/>		
<b>e. Organizational Unit:</b>			
Department Name: <input type="text" value="Community Development"/>		Division Name: <input type="text"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>			
Prefix:	<input type="text" value="Mr."/>	* First Name:	<input type="text" value="Michael"/>
Middle Name:	<input type="text" value="D."/>		
* Last Name:	<input type="text" value="Keys"/>		
Suffix:	<input type="text"/>		
Title:	<input type="text" value="Director of Community Development"/>		
Organizational Affiliation: <input type="text"/>			
* Telephone Number: <input type="text" value="330-841-2565"/>		Fax Number: <input type="text" value="330-841-2643"/>	
* Email: <input type="text" value="mkeys@warren.org"/>			

<b>Application for Federal Assistance SF-424</b>			
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="C: City or Township Government"/> Type of Applicant 2: Select Applicant Type: <input type="text"/> Type of Applicant 3: Select Applicant Type: <input type="text"/> * Other (specify): <input type="text"/>			
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U.S. Department of Housing and Urban Development"/>			
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14.239"/> CFDA Title: <input type="text" value="HOME Investment Partnerships (HOME)"/>			
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="B-23-DC-39-0202"/> * Title: <input type="text" value="HOME Investment Partnerships (HOME)"/>			
<b>13. Competition Identification Number:</b> <input type="text" value="N/A"/> Title: <input type="text"/>			
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <div> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>			
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="Projects listed in our 2023 ACTION Plan"/>			
Attach supporting documents as specified in agency instructions. <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>			

Application for Federal Assistance SF-424	
<b>16. Congressional Districts Of:</b>	
* a. Applicant <input style="width: 100px;" type="text" value="OH-017"/>	* b. Program/Project <input style="width: 100px;" type="text" value="OH-017"/>
Attach an additional list of Program/Project Congressional Districts if needed. <div style="display: flex; align-items: center;"> <input style="width: 200px; height: 20px;" type="text"/> <div style="margin-left: 10px;"> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div> </div>	
<b>17. Proposed Project:</b>	
* a. Start Date: <input style="width: 100px;" type="text" value="01/01/2023"/>	* b. End Date: <input style="width: 100px;" type="text" value="12/31/2023"/>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	<input style="width: 150px;" type="text" value="813,262.00"/>
* b. Applicant	<input style="width: 150px;" type="text" value="0.00"/>
* c. State	<input style="width: 150px;" type="text" value="0.00"/>
* d. Local	<input style="width: 150px;" type="text" value="0.00"/>
* e. Other	<input style="width: 150px;" type="text" value="0.00"/>
* f. Program Income	<input style="width: 150px;" type="text" value="175,443.49"/>
* g. TOTAL	<input style="width: 150px;" type="text" value="988,705.49"/>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b> <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input style="width: 100px;" type="text"/> . <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <div style="display: flex; align-items: center;"> <input style="width: 200px; height: 20px;" type="text"/> <div style="margin-left: 10px;"> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div> </div>	
<b>21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)</b> <input checked="" type="checkbox"/> ** I AGREE <small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
<b>Authorized Representative:</b>	
Prefix: <input style="width: 100px;" type="text" value="Mr."/>	* First Name: <input style="width: 200px;" type="text" value="William"/>
Middle Name: <input style="width: 250px;" type="text" value="D."/>	
* Last Name: <input style="width: 300px;" type="text" value="Franklin"/>	
Suffix: <input style="width: 100px;" type="text"/>	
* Title: <input style="width: 350px;" type="text" value="Mayor"/>	
* Telephone Number: <input style="width: 200px;" type="text" value="330-841-2602"/>	Fax Number: <input style="width: 150px;" type="text"/>
* Email: <input style="width: 400px;" type="text" value="dfranklin@warren.org"/>	
* Signature of Authorized Representative:	<div style="border: 1px solid black; width: 250px; height: 60px; display: flex; align-items: center; justify-content: center;"> </div>
* Date Signed: <input style="width: 100px;" type="text" value="03/21/23"/>	



### ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

Previous Edition Usable

Authorized for Local Reproduction

Standard Form 424B (Rev. 7-97)  
Prescribed by OMB Circular A-102

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Warren, Ohio	03/21/23

Standard Form 424B (Rev. 7-97) Back

# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.


Previous Edition Usable

Authorized for Local Reproduction

Standard Form 424D (Rev. 7-97)  
Prescribed by OMB Circular A-102



11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Warren, Ohio	03/21/23

SF-424D (Rev. 7-97) Back

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

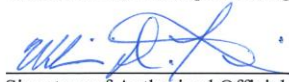
**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

  
Signature of Authorized Official

03/21/23  
Date

Mayor  
Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2023 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

  
Signature of Authorized Official

03/21/23  
Date

Mayor \_\_\_\_\_  
Title

**OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

  
Signature of Authorized Official

03/21/23  
Date

\_\_\_\_\_  
Mayor  
Title

### Specific HOME Certifications

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
Signature of Authorized Official

03/21/23  
Date

\_\_\_\_\_  
Mayor  
Title



## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.