

2024-2028 CONSOLIDATED PLAN

2024 ANNUAL ACTION PLAN



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Table of Contents

Executive Summary	5
ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)	5
The Process	8
PR-05 Lead & Responsible Agencies 24 CFR 91.200(b).....	8
PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)	9
PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)	15
Needs Assessment.....	17
NA-05 Overview	17
NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)	18
NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)	28
NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)	32
NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)	37
NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)	39
NA-35 Public Housing – 91.205(b).....	41
NA-40 Homeless Needs Assessment – 91.205(c)	48
NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)	51
NA-50 Non-Housing Community Development Needs – 91.215 (f)	55
Housing Market Analysis	58
MA-05 Overview.....	58
MA-10 Number of Housing Units – 91.210(a)&(b)(2).....	59
MA-15 Housing Market Analysis: Cost of Housing - 91.210(a).....	62
MA-20 Housing Market Analysis: Condition of Housing – 91.210(a).....	65
MA-25 Public and Assisted Housing – 91.210(b)	68
MA-30 Homeless Facilities and Services – 91.210(c).....	72
MA-35 Special Needs Facilities and Services – 91.210(d)	75
MA-40 Barriers to Affordable Housing – 91.210(e)	77

MA-45 Non-Housing Community Development Assets – 91.215 (f).....	78
MA-50 Needs and Market Analysis Discussion	83
MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)	85
MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)	89
Strategic Plan.....	91
SP-05 Overview.....	91
SP-10 Geographic Priorities – 91.215 (a)(1)	92
SP-25 Priority Needs - 91.215(a)(2).....	94
SP-30 Influence of Market Conditions – 91.215 (b).....	99
SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)	100
SP-40 Institutional Delivery Structure – 91.215(k)	102
SP-45 Goals Summary – 91.215(a)(4)	105
SP-50 Public Housing Accessibility and Involvement – 91.215(c)	107
SP-55 Barriers to affordable housing – 91.215(h)	108
SP-60 Homelessness Strategy – 91.215(d)	109
SP-65 Lead based paint Hazards – 91.215(i)	111
SP-70 Anti-Poverty Strategy – 91.215(j)	113
SP-80 Monitoring – 91.230	114
Expected Resources	115
AP-15 Expected Resources – 91.220(c)(1,2)	115
Annual Goals and Objectives.....	117
AP-20 Annual Goals and Objectives	117
Projects.....	119
AP-35 Projects – 91.220(d)	119
AP-38 Project Summary	120

AP-50 Geographic Distribution – 91.220(f)	122
Affordable Housing.....	124
AP-55 Affordable Housing – 91.220(g)	124
AP-60 Public Housing – 91.220(h)	126
AP-65 Homeless and Other Special Needs Activities – 91.220(i)	128
AP-75 Barriers to affordable housing – 91.220(j)	131
AP-85 Other Actions – 91.220(k)	132
Program Specific Requirements.....	134

Executive Summary

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

1. Introduction

Every five years, the U.S. Department of Housing and Urban Development (HUD) requires the creation of a Consolidated Plan to assist the City of Cleveland in determining community needs and further provide a community-wide dialogue regarding affordable housing and community development priorities. This document is the Consolidated Plan for July 1, 2024 to June 30, 2028. CDBG is a flexible grant that can be used for housing, neighborhood revitalization, workforce and economic development, community and non-profit facilities, infrastructure, and public services in low-moderate income communities.

The City as an entitlement jurisdiction, receives federal funds from HUD funds proportional to its population size. As a recipient of federal grant funds, HUD requires the City of Cleveland to produce a Consolidated Plan every five years and an Annual Action Plan every year. These documents serve as the application for funding for Community Development Block Grant (CDBG) to help low-income individuals and families. All funds must assist low-moderate income (LMI) individuals and families. Entitlement funds must focus on at least one of the following objectives for low-and-moderate income persons: increase the availability/accessibility, affordability and sustainability of decent housing, create suitable living environments, and/or expand economic opportunities.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The Consolidated Plan provides a framework to address the needs of the City over the next five-year period using Community Development Block Grant (CDBG) funds. The overarching objectives guiding the proposed activities, providing decent housing and creating suitable living environments reflect how programs and activities benefit a community or the people served. The three outcomes that will illustrate the benefits of each activity funded by the CDBG program are:

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

During the development of the Consolidated Plan, the City of Cleveland Needs Assessment revealed the following priority needs:

- Homeless services
- Affordable Housing Options
- Infrastructure improvements
- Economic Development for Small Businesses
- Homeless Shelters
- Housing Rehabilitation

3. Evaluation of past performance

As reported in the City's 2022 CAPER, the City was able to undertake and complete activities consistent with the priorities identified in the 5 Year Consolidated Plan and One Year Annual Plan. The City received a total of \$374,768.00 in CDBG funds for the 2020 Program Year. The City expended \$450,149.53 in 2022 and prior year CDBG funds for the following activities:

- Public Facility Renovations & Improvements:
 - Mosby Park - \$340,320.09
 - Blythe Community Sidewalk - \$20,542.99
- Down Payment Assistance - \$36,000.00
- Code Enforcement - \$53,286.45

4. Summary of citizen participation process and consultation process

The following measures were taken to encourage citizen participation:

- Posted copies of the draft plans in City Hall. The location of the copies was noted in the final hearing legal advertisement.
- Posted draft plans electronically on the City's website.
- Provided opportunity to comment on the plans at two formal meeting settings.
- Published all meetings in the local newspaper legal advertisement section.
- Solicited comments from interested social service agencies.
- Web-based surveys for the public from January 5, 2024 to February 15, 2024 which generated 61 responses in total. Questions focused on housing and community development needs.
- The City held its needs assessment workshop on February 1, 2024.

- The City will hold a final public hearing to obtain comments on the proposed Consolidated Plan for FY 2024-2028 upon the release of the 2024 final allocations from HUD.

5. Summary of public comments

Major needs highlighted during the Public Needs Hearing, Neighborhood Meetings, and stakeholder interviews are as follows:

Public Service Needs:

- Additional need for permanent supportive housing programs
- Lack of facilities and services for unsheltered homeless persons

Affordable Housing Needs:

- There is a need for additional emergency shelter & transitional housing beds
- Limited finance resources of local agencies with homeless programs
- Lack of affordable rental housing
- Housing Rehabilitation

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

All comments were accepted.

7. Summary

The City made every effort for citizens to provide input.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	CLEVELAND	City Administration

Table 1 – Responsible Agencies

Narrative

City of Cleveland's Administration Department is the lead agency for the development, administration, and review of the 2024 – 2028 Consolidated Plan and 2024 Annual Action Plan. The Division administers Community Development Block Grant (CDBG) funds received from the U.S. Department of Housing and Urban Development (HUD), and coordinates execution of projects related to the priorities and goals identified in the Consolidated Plan.

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

The City developed an outreach effort to maximize input from a large cross-section of stakeholders. This outreach effort included public meetings, neighborhood meetings, published meeting notices, and a web survey conducted in both English and Spanish. Consultation with the community and affected service providers is a fundamental component of the Consolidated Plan and Action Plan process. The key to the Consolidated Plan consultation process is to consult with a wide array of organizations whose mission and contribution to the community ensures a diverse yet comprehensive assessment of need, as well as input into the development of housing and community development strategies to address the need.

The City launched a collaborative effort to consult with elected officials, City departments, community stakeholders, and beneficiaries of entitlement programs to inform and develop the priorities and strategies contained within this five-year plan.

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(I)).

The City welcomed and encouraged the participation of all citizens in the development of these plans and in the review of progress in implementing plan activities. The City particularly encouraged involvement by low and moderate-income households residing in areas targeted for program activities for minorities and non-English speaking persons, as well as persons with disabilities. In addition, residents of public housing and other assisted housing are encouraged to participate. A special effort is made to assure that low and moderate-income persons, households in areas assisted by program activities and persons special needs have opportunities to participate.

The City held two needs assessments meetings through its public participation process prior to the development of the plan and a public meeting to review the draft priorities. These meetings are summarized in the Citizen Participation Section of this plan. Drafts of the plans have been posted on the City webpage. Notices of public meetings and hearings were published in the local newspaper.

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 City of Cleveland works closely with the Cleveland Emergency Shelter, the only emergency shelter for homeless persons within the jurisdiction. The Cleveland Emergency Shelter is part of the Continuum of Care and actively participates in the CoC planning process. Although Cleveland has not been a direct entitlement jurisdiction for the Emergency Shelter Grant (ESG) program, they do participate and receive funding under the State of Tennessee’s small cities program administered by the Tennessee Housing and Development Agency (THDA). The City of Cleveland matches the ESG program with assistance to the Cleveland Emergency Shelter. The shelter provides more than just emergency housing, it also provides employment training in-house, life skills training, and helps reduce homelessness by helping with utilities, deposits, and correcting arrearages.

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

The City is a part of the regional Chattanooga/Southeast Tennessee Continuum of Care (CoC). The CoC covers an eleven county region. In consultation to develop this plan, the City consulted with the Continuum to gain access to all CoC data. The City was provided data from the Homeless Management Information System (HMIS), Point-in-Time Count (PIT), the Housing Inventory Count, and information from the Annual Homeless Assessment Report (AHAR). Through this collaboration, the City ensures that CoC goals and the City’s Consolidated Plan priorities are integrated into the plan.

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

1	Agency/Group/Organization	HABITAT FOR HUMANITY OF CLEVELAND
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
2	Agency/Group/Organization	CITY OF CLEVELAND
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
3	Agency/Group/Organization	Cleveland Emergency Shelter
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	

4	Agency/Group/Organization	Bradley/Cleveland Community Services Agency
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
5	Agency/Group/Organization	Cleveland Housing Authority
	Agency/Group/Organization Type	PHA Services - Housing Service-Fair Housing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Families with children Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	
6	Agency/Group/Organization	City Fields
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	

Table 2 – Agencies, groups, organizations who participated

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

All entities were considered for consultation.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Housing, Health & Human Services Alliance of Rutherford County	Affordable housing, services, and economic development
10-Year Plan to Prevent Hunger and End Homelessness	Housing, Health & Human Services Alliance of Rutherford County	The Strategic Plan's goals to address homelessness align with Continuum of Care's goals and strategies.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

In accordance with 24 CFR 91.100(4), the City will notify adjacent units of local government of the non-housing community development needs included in its Consolidated Plan. The City will continue to interact with public entities at all levels to ensure coordination and cooperation in the implementation of the Consolidated Plan and thereby maximizing the benefits of the City's housing and community development activities for the residents being served.

Narrative (optional):

Combined, these agencies provide housing and supportive services to the community's special needs populations, including persons with disabilities, homeless families and individuals, chronic homeless persons, persons with HIV/AIDS, and the elderly. In addition to many of the agencies listed above many of the groups and agencies that were consulted provided information during the development of the plan.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

City 's goals are a direct result of feedback from the community regarding issues to be resolved and projects in need of funding. The City has an adopted Citizen Participation Plan to ensure consistent outreach efforts. A community needs survey in English and Spanish was available to residents, housing service providers. The survey was open from January 5, 2024 to February 15, 2024 and generated 61 responses. The survey was advertised along with the community meetings. The City held its needs assessment workshop on February 1, 2024. The City held a public hearing in February 20, 2024 to discuss the Consolidated Planning process and the City will hold a final public hearing to obtain comments on the proposed Consolidated Plan for FY 2024-2028 upon the release of the 2024 final allocations from HUD.

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	Survey	Non-targeted/ broad community	A total of 61 surveys was received.	See Survey Results in Citizen Participation Comments.	None	https://www.surveymonkey.com/r/clevelandneeds
2	Public Meeting	Non-targeted/ broad community	Local organizations attended the Needs Assessment Meeting.	Homeless services; Affordable Housing Options; Infrastructure improvements; Economic Development for Small Businesses; Homeless Shelters; Housing Rehabilitation	None	N/A
3	Public Hearing	Non-targeted/ broad community	Local residents attended the public hearing to learn about CDBG objectives and examples of past projects.	Inquiries about pursuing economic development and parking issues at the South Cleveland Community Center and , need more parking spaces, more sidewalks on 14 th St.	None	N/A
4	Newspaper Ad	Non-targeted/ broad community	The public was notified of the public meetings via a newspaper ad	The City did not receive any comments based solely on the newspaper ad.	All comments were accepted	N/A

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Based on HUD provided figures, the following data indicates the number and percentage of renters and homeowners who may be subject to housing problems, based on income level.

HUD receives a “special tabulation” of data from the U.S. Census Bureau’s American Community Survey (ACS) that is largely not available through standard Census products. These “special tabulation” data provide counts of the numbers of households that fit certain combinations of HUD-specified criteria such as housing needs, HUD-defined income limits (primarily 30, 50, and 80 percent of area median income) and household types of particular interest to planners and policymakers. This data, known as the Comprehensive Housing Affordability Strategy (CHAS) data, is used by local governments for housing planning and as part of the Consolidated Planning process.

Assessing the specific housing needs of Cleveland, Tennessee is critical to creating a realistic and responsive affordable housing strategy. As such, an assessment of the City’s affordable rental and single-family homes was conducted based on available demographic, economic and housing data for Cleveland, Tennessee utilizing HUD’s new eCon Planning Suite downloaded in the Integrated Disbursement and Information System (IDIS). The eCon Planning Suite pre-populates the most up-to-date housing and economic data available to assist jurisdictions identify funding priorities in the Consolidated Plan and Annual Action Plan. Highlights of this assessment are provided in this section.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The area median income (AMI) is a statistic generated by the U.S. Department of Housing and Urban Development (HUD) for purposes of determining the eligibility of applicants for certain federal housing programs. HUD determines AMI on an annual basis for each metropolitan area, adjusting for household size and other factors.

According to the 2013-2017 5-Year American Community Survey (ACS), the Cleveland, Tennessee is home to 45,120 residents living in 16,990 households, as shown in Table 5. Since 2009, the population grew by 5%, while the number of households expanded by 6%. Median household income increased by 21% from \$36,669 in 2009 to \$44,542 in the 2013-2017 ACS.

Demographics	Base Year: 2009	Most Recent Year: 2017	% Change
Population	42,890	45,120	5%
Households	15,975	16,990	6%
Median Income	\$36,669.00	\$44,542.00	21%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Number of Households Table

Table 6 identifies income levels for a variety of household types, including small families (2-4 members) large families (5 or more members), households with young children, and households with seniors. As depicted in the table, 9,630 households in the City of Cleveland have low or moderate incomes (under 80% of HUD Area Median Family Income (HAMFI)), which comprises 57% of the City's total households.

Looking at income level by household type shows that nearly half of large family households (48% or 594 households) and small family households (46% or 3,160), and over half of households with at least one person 75 and over (78% or 1,813), and households with at least one or more children 6 years old or younger (70% or 1,410) have incomes of 80% less of the HUD AMI.

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	2,860	1,940	3,190	1,640	7,365
Small Family Households	690	760	1,175	535	3,690
Large Family Households	215	120	185	74	650
Household contains at least one person 62-74 years of age	364	360	645	429	1,954

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Household contains at least one person age 75 or older	620	310	450	433	500
Households with one or more children 6 years old or younger	394	519	344	153	614

Table 6 - Total Households Table

Data 2013-2017 CHAS
Source:

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	74	0	29	4	107	0	0	0	0	0
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	75	20	25	4	124	0	0	0	10	10
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	45	0	50	25	120	0	0	50	0	50
Housing cost burden greater than 50% of income (and none of the above problems)	1,240	395	4	0	1,639	265	34	130	40	469
Housing cost burden greater than 30% of income (and none of the above problems)	300	835	680	60	1,875	100	185	235	50	570

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	265	0	0	0	265	0	0	0	0	0

Table 7 – Housing Problems Table

Data Source: 2013-2017 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,435	415	109	33	1,992	265	34	180	50	529
Having none of four housing problems	785	1,040	1,950	755	4,530	375	450	945	800	2,570
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 8 – Housing Problems 2

Data Source: 2013-2017 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	415	555	380	1,350	69	54	105	228
Large Related	120	120	15	255	64	0	45	109
Elderly	310	204	105	619	200	149	198	547
Other	834	355	214	1,403	29	19	44	92
Total need by income	1,679	1,234	714	3,627	362	222	392	976

Table 9 – Cost Burden > 30%

Data 2013-2017 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	70	70	24	24	0	48
Large Related	0	0	25	25	64	0	0	64
Elderly	225	49	0	274	155	10	104	269
Other	0	675	245	920	19	0	0	19
Total need by income	225	724	340	1,289	262	34	104	400

Table 10 – Cost Burden > 50%

Data 2013-2017 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	120	4	75	25	224	0	0	0	10	10
Multiple, unrelated family households	0	0	0	4	4	0	0	50	0	50
Other, non-family households	0	15	0	0	15	0	0	0	0	0
Total need by income	120	19	75	29	243	0	0	50	10	60

Table 11 – Crowding Information – 1/2

Data Source: 2013-2017 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

Estimates of the number of single person households in need of housing assistance are not available for Cleveland. In Tables 9 and 10 above, non-elderly single person households are included in the “other” household category, along with non-family households, such as roommates or non-married partner households. Table 9 shows that there are an estimated 1,403 “other” renter households and 92 “other” owner households with low or moderate incomes who spend more than 30% of their income on housing. Table 10 reflects households that are severely cost burdened, 71% of renter households and 5% of owner households, meaning that they spend over 50% of their income on housing. Reflected in Table 11, there are a total of 234 single family households in the city of which 89% have incomes below 80% AMI.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

The National Coalition Against Domestic Violence (NCADV) reports that 1 in 4 women and 1 in 9 men experience severe intimate partner physical violence, intimate partner contact sexual violence, and/or intimate partner stalking with impacts such as injury, fearfulness, post-traumatic stress disorder, use of victim services, contraction of sexually transmitted diseases, etc. According to the Rape, Abuse & Incest National Network (RAINN), someone in the United States is sexually assaulted every 73 seconds. The exact number of families needing housing assistance due to domestic violence, dating violence, sexual assault, and stalking can be difficult to estimate in Cleveland, as many cases go unreported. However, there is a significant need for supportive housing services for survivors.

In Cleveland, there is one domestic violence and abuse shelter and program, with one providing a hotline service and another offering emergency shelter. Additionally, in neighboring areas such as Riceville, Athens, and Chattanooga, there are a total of nine additional domestic violence and abuse shelters and programs where assistance can be sought. Harbor Safe House & Advocacy Center offers a secure and confidential refuge for individuals experiencing domestic and/or sexual violence in perilous and abusive circumstances. It provides a haven where individuals can reclaim their inner strength and dignity, empowering them to initiate the process of breaking free from the cycle of abuse.

Overall, while it's challenging to provide precise numbers, it's evident that there is a substantial population of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault, and stalking. Addressing their housing needs requires a coordinated effort among government agencies, non-profit organizations, advocacy groups, and community stakeholders to provide safe, affordable, and supportive housing options tailored to their unique circumstances.

What are the most common housing problems?

Within the CHAS data, HUD identifies four housing problems:

Housing lacking complete kitchen facilities

Housing lacking complete plumbing facilities

Household is overcrowded (with more than 1 person per room)

Household is cost burdened (paying more than 30% of income towards housing costs, including utilities)

In addition, HUD also defines severe housing problems as:

- Severely overcrowded, with more than 1.5 persons per room
- Severely cost burdened families (paying more than 50% of income towards housing costs, including utilities)

By far the most common housing problems in the Cleveland for both owners and renters are cost burdening and severe cost burdening. Table 9 reveals that 3,627 low- and moderate-income renter households spend more than 30% of their income on housing, as do 976 low- and moderate-income owner households. Taken together, there are 4,603 cost burdened households with incomes below 80% AMI.

When considering the total number of low- and moderate-income households who pay more than 30% of their total monthly income towards housing. The housing trend reflects renters and extremely low-income households are much more likely to have housing problems than homeowners and higher income households especially with current escalating rent and housing costs, putting additional economic pressure on a household.

Are any populations/household types more affected than others by these problems?

When considering the total number of low- and moderate-income households who pay more than 30% of their total monthly income towards housing, the housing trend reflects renters and extremely low-income households are much more likely to have housing problems than homeowners and higher income households. CHAS data on severe housing problems indicated 56% renter households with 0-50% AMI and 36% owner households with 0-50% AMI had one or more housing problems. This trend also holds true with overcrowding, as 49% of renter households and 83% of owner household experienced overcrowding households. The elderly, particularly homeowners, were also affected by cost burdens. A total of 274 or 21% elderly homeowner households are paying more than 30-50% of the Area Median Income for their home.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Individuals with an imminent risk of residing in shelters or becoming unsheltered typically have a combination of financial factors present in their lives: lack of living wage job, rent consuming more than 30% of their income, and high childcare, medical, or transportation costs. In addition to these factors, individuals at risk of homelessness will often have additional issues present family conflicts, domestic violence, doubling up with family members, recent crisis, housing with code or safety violations, family members with disabilities, criminal histories, history of mental health or chemical dependency, difficulty navigating systems to access public benefits or community-based services, and prior experience with homelessness.

For formerly homeless families and individuals receiving housing assistance but nearing the termination of that assistance, key needs include access to Social Security disability and other benefits; stable employment or access to mainstream job training, employment, and education programs; linkages to health and mental health services; convenient access to affordable childcare and transportation; and continued case management and supportive services.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Cleveland does not currently estimate the at-risk population within the jurisdiction. Local agencies along with Continuum of Care is working on this issue. To determine eligibility for services, the City adheres to the HUD definition of “At-Risk”:

An individual or family who:

- (i) Has an annual income below 30% of median family income for the area; AND
- (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND
- (iii) Meets one of the following conditions:
 - (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
 - (B) Is living in the home of another because of economic hardship; OR
 - (C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
 - (D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR

- (E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR
- (F) Is exiting a publicly funded institution or system of care

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Severe cost burden is the greatest predictor of homelessness risk, with populations paying more than 50% of their income towards housing costs or having incomes at or below 50% AMI. There are large numbers of households in Cleveland paying half of their gross monthly income for housing costs. Other expenses such as transportation, food, utilities, healthcare, and other costs decrease disposable income and a household’s ability to save. Consequently, a household can be more vulnerable if unexpected life issues such as illness, job loss or another circumstances that causes a loss of income or an unexpected expense. Limited or lack of income can be linked to instability and risk of becoming homeless.

Discussion

Low rates of housing affordability and low vacancy levels hamper access to stable affordable housing. Like other segments of the community, the City’s homeless population anticipates higher rates of the homeless elderly and that more seniors will be living alone over the next decade. Housing stock will need to accommodate these population changes and offer access to smaller units that are affordable on a fixed income, are physically accessible, and are located near community-based support services.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

According to HUD, a disproportionately greater need exists when members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Tables 13 through 16 identify the number of households experiencing one or more of the four housing problems by race and ethnicity and income level. The four housing problems include: (1) cost burden (paying more than 30% of income for housing and utilities); (2) overcrowding (more than one person per room); (3) lacking complete kitchen facilities; and (4) lacking complete plumbing facilities. Income classifications include extremely low income (under 30% of Area Median Income (AMI)); low income (30-50% AMI); moderate income (50-80% AMI); and middle income (80-100% AMI).

0%-30% of Area Median Income

Of the 2,270 households earning 0-30 percent of AMI, 77%, or 1,740 households, report one or more housing problems. At this income level, disproportionate impact, as defined by HUD, exists only for Hispanic households, of which 90% (235 households) face housing problems. Other groups with relatively greater need—i.e. where, for a group, the proportion of households with housing problems is greater than that of the jurisdiction, but with a difference less than 10 percent—are: White (74%), Black (83%), and Asian (75%) households.

Proportionately, Black/African American households account for the largest share of households with housing problems—83%.

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,740	295	235
White	1,260	285	165
Black / African American	170	0	35
Asian	30	10	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	235	0	25

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Of the 1,695 households earning 30-50 percent of AMI, 81% or 1,375 households, report one or more housing problems. At this income level, disproportionate impact exists for Asian (100%) and Hispanic households (92%) face housing problems. Other groups with relatively greater need include White (77% or 1,260) and Black (92% or 178) households.

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,375	320	0
White	965	295	0
Black / African American	164	14	0
Asian	34	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	165	15	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Of the 2,510 households earning 50-80 percent of AMI, 57% or 1,425 households, report one or more housing problems. At this income level, disproportionate impact exists for Asian households, of which 100% or 23 households, and Hispanic households at 77% or 278 face housing problems. Other groups with relatively greater need include White households at 53% and Black households at 55%.

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,425	1,085	0
White	985	860	0
Black / African American	180	150	0
Asian	23	0	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	213	65	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

80%-100% of Area Median Income

Of the 1,905 households earning 80-100 percent of AMI, 35%, or 670 households, report one or more housing problems. At this income level, disproportionate impact exists only for Hispanic households, of which 66% (190) face housing problems. White households also have relatively greater need, at 30% or 405 households.

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	670	1,235	0
White	405	935	0
Black / African American	75	155	0
Asian	0	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	190	99	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Overall, of the 16,596 households with incomes below AMI, 62%, or 10,304 households, report one or more housing problems. At 0-100 percent of AMI, Hispanic and Asian households are disproportionately impacted by housing problems, by HUD's definition. Of the 1,007 Hispanic households with incomes below AMI, 80% have one or more housing problems. Comparatively, of the 107 Asian households, 81% have one or more housing problems. Other groups with relatively greater need include White households (59%) and Black households (62%) at incomes 0-100% AMI.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD defines “disproportionately greater need” as existing when the members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Here, we discuss whether racial or ethnic groups are disproportionately impacted by severe housing problems at four levels of AMI: 0-30 percent, 30-50 percent, 50-80 percent, and 80-100 percent of AMI. Severe housing problems, as referenced in this section, include the following:

- lack of complete kitchen facilities
- lack of complete plumbing facilities
- severe overcrowding (i.e. more than 1.5 persons per room)
- cost burden over 50 percent (i.e. spending more than 50 percent of income on housing)

0%-30% of Area Median Income

Of the 2,265 households earning 0-30 percent of AMI, 62%, or 1,415 households, report one or more severe housing problems. At this income level, disproportionate impact exists for Hispanic households 82% (210 households) and Asian households (75% or 30 households) face severe housing problems. Other groups with relatively greater need include White (61%) and Black (54%) households.

Additionally, absolute terms, Hispanic households account for the largest portion of households with housing problems by far.

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,415	615	235
White	1,035	505	165
Black / African American	110	60	35
Asian	30	10	0
American Indian, Alaska Native	0	0	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	0	0	0
Hispanic	210	20	25

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Of the 1,694 households earning 30-50 percent of AMI, 53% or 894 households, report one or more severe housing problems. At this income level, disproportionate impact exists for Black households at 81% or 144 households and Hispanic households at 56% or 180 households.

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	894	800	0
White	625	640	0
Black / African American	144	34	0
Asian	4	30	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	100	80	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

50%-80% of Area Median Income

Of the 2,514 households earning 50-80 percent of AMI, 15% or 379 households report one or more severe housing problems. At this income level, disproportionate impact exists only for Asian households, of which 15 or 65% face severe housing problems.

In addition, for Black households (21%), the percentage of households with housing problems is greater than the percentage of households overall. White households face severe housing problems proportionate with the jurisdiction as a whole at 14% or 255 households.

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	379	2,135	0
White	255	1,595	0
Black / African American	69	265	0
Asian	15	8	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	40	244	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

80%-100% of Area Median Income

Of the 1,900 households earning 80-100 percent of AMI, 17% or 330 households, report one or more severe housing problems. Hispanic households disproportionately experience severe housing problems at 62% or 290 at this income level.

Also, for Black and Hispanic households, the percentage of households with housing problems is greater than percentage of households overall at 26% and 62% respectively. White households (7%) experience a severe housing problem less than the jurisdiction as a whole.

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	330	1,570	0
White	90	1,250	0
Black / African American	60	170	0
Asian	0	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	180	110	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

Discussion

Overall, of the 8,373 households with incomes below AMI, 36% or 3,018 households, report one or more severe housing problems. At 0-100 percent of AMI, Asian (46%) and Hispanic (53%) households are disproportionately impacted by housing problems, by HUD's definition. Other groups with relatively greater need include White households (33%) and Black households (40%).

In absolute terms, Hispanic households make up the largest portion of households impacted by housing problems citywide at 53%.

The proportion of households with housing problems also generally mirrors the population at large for each racial or ethnic group. The largest difference is existing in the Hispanic population where the percentage of impacted households (53%) is 16% higher and the Asian population (46%), which is 10% higher than in the in the general population (36%).

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

Per HUD definitions, a “disproportionate need” exists when any group has a housing need that is 10% or higher than the jurisdiction as a whole. A household is considered cost burdened when they are paying more than 30% of their income towards housing costs, including utilities. This section analyzes the extent of cost burden and identifies populations that are disproportionately affected.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	10,670	2,810	2,594	250
White	9,145	2,125	1,820	185
Black / African American	790	215	310	35
Asian	90	89	54	0
American Indian, Alaska Native	14	0	0	0
Pacific Islander	0	0	0	0
Hispanic	575	324	385	25

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2013-2017 CHAS

Discussion:

Table 21 shows the number of households with and without housing cost burden, as well as the number of households with no or negative income, by race or ethnicity and citywide. Households spending 30-50 percent or over 50 percent of their income on housing are considered moderately or severely cost burdened. Disproportionate impact among households with no or negative income is also considered.

Displayed in the table, 17% of households in the City of Cleveland spend between 30% and 50% of their income on housing costs. Asian households (38%) are disproportionately represented in this range compared to the jurisdiction as a whole.

At less than 30% AMI, 65% of households fall in this category overall. White households are affected closely to the range of the city as a whole at 69%. Several racial/ethnic groups at this income level are disproportionately affected: Asian households at 39%, American Indian, Alaska Native at 100%, and Hispanic households at 44% of the jurisdiction as a whole. Black households are disproportionately likely to fall within this category at 80% and 100% respectfully, for the city as a whole. Black (60%), American Indian/Alaska Native (50%), and Hispanic (49%) households are disproportionately less than the jurisdiction as a whole.

Citywide, 16% of households spend over 50% of their income on housing costs. Rates of severe cost burdening by race and ethnicity range from 14% for Whites to 29% for Hispanics. Hispanic households disproportionately face a high rate of severe cost burdening than the jurisdiction as a whole.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Housing Problems – Overall, of the 16,596 households with incomes below AMI, 62%, or 10,304 households, report one or more housing problems. At 0-100 percent of AMI, Hispanic and Asian households are disproportionately impacted by housing problems, by HUD’s definition. Of the 1,007 Hispanic households with incomes below AMI, 80% have one or more housing problems. Comparatively, of the 107 Asian households, 81% have one or more housing problems. Other groups with relatively greater need include White households (59%) and Black households (62%) at incomes 0-100% AMI.

Severe Housing Problems – Overall, of the 8,373 households with incomes below AMI, 36% or 3,018 households, report one or more severe housing problems. At 0-100 percent of AMI, Asian (46%) and Hispanic (53%) households are disproportionately impacted by housing problems, by HUD’s definition. Other groups with relatively greater need include White households (33%) and Black households (40%).

Housing Cost Burdens - Overall, of the 8,373 households with incomes below AMI, 36% or 3,018 households, report one or more severe housing problems. At 0-100 percent of AMI, Asian (46%) and Hispanic (53%) households are disproportionately impacted by housing problems, by HUD’s definition. Other groups with relatively greater need include White households (33%) and Black households (40%).

If they have needs not identified above, what are those needs?

Stakeholder input shows that, in addition to housing needs-, low- and moderate-income households are also more likely to face difficulties affording transportation and childcare costs. For low incomes households without a car, transit access and hours may impact their ability to obtain and keep employment. Additionally, low- and moderate-income disabled persons may face difficulty affording paratransit service.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

The U.S. Department of Housing and Urban Development (HUD) defines a Racially/Ethnically Concentrated Area of Poverty (R/ECAP) as an area with one or more census tracts that contain the following characteristics:

- (i) a family poverty rate greater than or equal to 40 percent, or
- (ii) a family poverty rate greater than or equal to 300 percent of the metro region’s tract average,

- (iii) whichever is lower.
- (iv) and a non-white population that is greater than 50 percent.

There are no census tracts in Cleveland that reach the thresholds described above.

Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

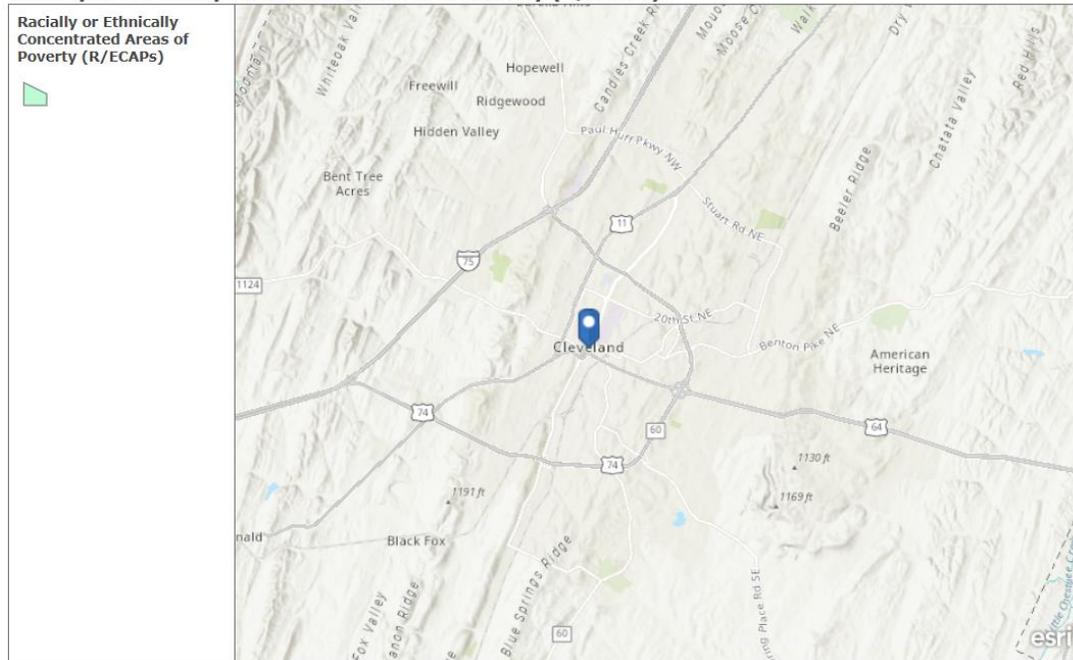


Figure 1: Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), <https://www.arcgis.com/home/webmap/viewer.html?panel=gallery&layers=56de4edea8264fe5a344da9811ef5d6e>

NA-35 Public Housing – 91.205(b)

Introduction

The 413 units of public housing and 207 tenant-based Section 8 vouchers are a critical source of affordable housing for very low-income families in Cleveland. The private housing market has historically been unable to meet this need. Public housing also provides housing for a disproportionate share of very low-income elderly and disabled households that have few other affordable options. Unfortunately, with federal budget cuts to ongoing maintenance programs and no programs for building new public housing, existing units are oversubscribed with multi-year waiting lists and public housing authorities are stretched to modernize their units.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	413	207	0	206	1	0	0

Table 22 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	8,211	9,563	0	9,554	11,448	0
Average length of stay	0	0	3	5	0	5	0	0
Average Household size	0	0	2	2	0	2	3	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	60	37	0	37	0	0
# of Disabled Families	0	0	133	53	0	52	1	0
# of Families requesting accessibility features	0	0	413	207	0	206	1	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	360	129	0	129	0	0	0
Black/African American	0	0	49	75	0	74	1	0	0
Asian	0	0	1	0	0	0	0	0	0
American Indian/Alaska Native	0	0	1	1	0	1	0	0	0
Pacific Islander	0	0	2	2	0	2	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	18	9	0	9	0	0	0
Not Hispanic	0	0	395	198	0	197	1	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The Cleveland Housing Authority (CHA) currently operates a Project Based Rental Assistance (PBRA) program of 293 units, and a Public Housing (PIH) program of 114 units. All CHA properties are disbursed over fourteen (14) scattered sites in southeast Cleveland. Additionally, CHA also operates a Housing Choice Voucher (HCV) program serving up to 208 families and a Veterans Affairs Supportive Housing (VASH) program serving up to 15 veteran families.

The amount of wait time varies depending on the number of applicants on the waiting list and the availability of housing. Generally, approved Public Housing applicants are housed in an average of six (6) months. The CHA will continue its efforts to increase accessible housing units through development and rehabilitation efforts of existing units, particularly with properties designated as Elderly.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Residents of Public Housing and Housing Choice Voucher (HCV) holders often have immediate needs that vary based on their individual circumstances, but there are some common needs that many of them share:

1. **Affordable Housing:** Both Public Housing residents and HCV holders require access to safe, decent, and affordable housing. For Public Housing residents, this means ensuring that their units are well-maintained and meet basic standards of habitability. For HCV holders, it involves finding landlords willing to accept their vouchers and ensuring that the rental units meet program requirements.
2. **Stable Housing:** Stability in housing is crucial for both groups. This includes protection from eviction, access to legal resources in case of disputes with landlords, and assistance in finding new housing if necessary.
3. **Financial Assistance:** Many residents of Public Housing and HCV holders have low incomes and may struggle to afford necessities such as food, utilities, and healthcare. Financial assistance programs, such as rental assistance, utility assistance, or vouchers for other needs, can help alleviate financial burdens and prevent homelessness.
4. **Access to Education and Job Training:** Residents of Public Housing and HCV holders often face barriers to employment and education. Access to job training programs, adult education classes, and childcare services can help them improve their skills and increase their earning potential, leading to greater financial stability.
5. **Healthcare Services:** Access to healthcare services, including physical and mental health services, is essential for the well-being of Public Housing residents and HCV holders. This

includes access to primary care physicians, mental health counselors, substance abuse treatment programs, and other healthcare resources.

6. **Community Resources and Support Services:** Many residents of Public Housing and HCV holders benefit from access to community resources and support services. This could include case management services, counseling services, support groups, childcare services, transportation assistance, and recreational programs.
7. **Safety and Security:** Residents of Public Housing and HCV holders deserve to live in safe and secure environments. This includes access to security measures such as well-lit common areas, security patrols, and emergency response systems, as well as measures to prevent crime and address safety concerns within the community.

Addressing the immediate needs of residents requires a comprehensive approach that involves collaboration between government agencies, non-profit organizations, community stakeholders, and residents themselves. By addressing these needs, the city can work with community partners to improve the quality-of-life tenants and promote housing **stability**.

How do these needs compare to the housing needs of the population at large

The needs of public housing residents are largely consistent with the needs of the low- and moderate-income population at large. In the general population, tenants are concerned about the quality and affordability of their existing housing. Without the housing subsidies and other supports provided by CHA, some of the affordability issues faced by the general population are even more acute.

Residents of public housing and Section 8 housing may not be cost burdened. The portion they pay for rent is fixed at 30% of the gross income, which is not the case for the households discussed in previous sections of the Consolidated Plan where cost burden and severe cost burden are key housing problems. Conversely, for public housing and Section 8 residents the more endemic problem is lack of income, in this context the lack of income needed to secure housing in the private market.

There is also a difference in housing need for homebuyer and homeowner services and programs. While many public housing and Section 8 residents aspire to and do become homeowners, their lower incomes traditionally have meant they are further out from having those opportunities and that larger public subsidies in the forms of grants and low/reduced/deferred interest second mortgages are required. With reductions in federal community development programs these sources of public funds are declining. The population at large, especially low to moderate income homeowners, also experience and have a bigger need for affordable home repair and energy retrofit programs.

Most public housing is in or very near to low to moderate income CDBG target neighborhoods. Public housing authorities and residents share the same concerns over code compliance and enforcement, the quality and standard of private rental housing, fair housing, the availability and accessibility of public facilities, healthy food options, and the standard litany of community development needs.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The information in the Homeless Needs Assessment is from the January 2023 Point-in-Time count that was done for Bradley County, Tennessee. Most of this information is not specific to Cleveland, TN, but does provide some insight as to the level of homelessness throughout southeast Tennessee. A point in time count is a "Count of sheltered and unsheltered homeless persons carried out on one night in January." The survey gathers data on a wide variety of topics, including the length of time that an individual or family experience homelessness, how many episodes of homelessness have been experienced in the past three years, as well as data on specific categories of people who are homeless, including chronically homeless individuals and families, families with children, veterans, and their families, and unaccompanied youth. This count is required of CoCs at least biennially. For the purpose of the count, the definition of a homeless person is one who is living in a place not meant for human habitation (abandon buildings or homes), a safe haven (transitional housing), or in an emergency shelter.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

The following section provides a general assessment of the City's homeless population and its needs. The U.S. Department of Housing and Urban Development (HUD) uses the following categories to define homelessness:

- Literally Homeless:
 - Sheltered Homeless: lives in emergency shelter, transitional housing for the homeless or a hotel or motel with the stay being paid for by an organization.
 - Unsheltered Homeless: lives in a car, park, abandoned building, encampment, dilapidated building, on the sidewalk, or similar location.
- Imminently Homeless: is facing loss of housing within two weeks, has no subsequent residence identified, and lacks the resources or support networks needed to obtain other permanent housing.
- Other Homeless: in jail, a hospital, or a detox program, but would otherwise have been homeless.

- Fleeing/Attempting to Flee Domestic Violence: Is fleeing, or is attempting to flee, domestic violence; has no other residence; and lacks the resources or support networks to obtain other permanent housing

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
Black or African American	2,146	955
White	2,370	3,348
Asian	14	16
American Indian or Alaska Native	44	41
Native Hawaiian or Other Pacific Islander	5	5
Multiple Races	115	156
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic/Latino	188	101
Non-Hispanic/Non-Latino	4,506	4,420

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

According to HUD’s 2023 CoC Homeless Assistance Programs Homeless Populations and Subpopulations report there is approximately 412 sheltered families with children and 112 unsheltered families with children in the State of Tennessee. There are 511 sheltered veteran families and 278 unsheltered veteran families in Tennessee.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

According to HUD’s 2023 CoC Homeless Assistance Programs Homeless Populations and Subpopulations report, 50% of people served were White, 46% were Black, and the remaining 4% were comprised of American Indian or Alaska Native, Asian, native Hawaiian, and multiple races. Only 4% of program participants identified as Hispanic or Latino.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

This information is not available specifically for the City of Cleveland therefore, there is no projection for the number of persons experiencing homelessness

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

This section will discuss the characteristics and needs of persons in various subpopulations of Cleveland, TN who are not homeless but may require supportive services. According to HUD, hard-to-house families face many challenges, including weak employment histories, long stays in public housing, poor health, substance abuse, and criminal records. Persons belonging to this population may have additional needs before, during, and after an incident in functional areas including but not limited to maintaining independence, communication, transportation, supervision, and medical care. Special needs populations include the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with HIV/AIDS, alcohol or drug addiction, criminal records, those who have limited English proficiency, those who are transportation disadvantaged, and veterans.

Describe the characteristics of special needs populations in your community:

The section below will describe why identifying the characteristics and needs of these subpopulations is essential to the planning process for these federal dollars. Non-homeless special needs populations experience many of the same housing and service needs and barriers that others in the Cleveland area experience. In fact, non-homeless special needs populations tend to be those who have extremely low or very low income who are at risk of becoming homeless as described earlier. Characteristics of non-homeless special needs populations include people who:

- Live on fixed income, limited income, or no income
- Lack available affordable housing
- Wait on long waiting lists for subsidized housing
- Lack housing with supportive services
- Lack credit history, have negative credit or rental history, have criminal backgrounds or other factors that affect their ability to find a willing landlord
- Have health issues, such as substance use or mental health disorders
- Lack job opportunities or are unable to work
- Lack affordable childcare
- Lack dependable transportation

Elderly and Frail Elderly

Elderly and frail elderly are often unable to maintain existing homes or to afford rent. They are often over-housed in homes that have more square footage than the elderly homeowner or renter can maintain on a limited budget. Housing cost burden-related issues are often compounded by the requirement of additional services it takes for elderly and frail-elderly to age in place. These services may include costly medical and other daily living assistance services. Frail and elderly

individuals are in a higher state of vulnerability for adverse health outcomes compared to non-frail elderly individuals, either due to slow declines or terminal illnesses.

The 2013 - 2017 American Community Survey 5-Year Estimates show the number of Cleveland residents that are 65 years and over at 5,667 which represents 13.50% of the city's population. Of those 65 and older 40.65% (2,299) are male and the remaining 59.55% (3,368) are female.

Persons with Physical & Developmental Disabilities

ACS defines ambulatory difficulties as seriously affecting motility and the ability to walk or climb stairs. Finding housing that is both affordable and accessible is a basic challenge for persons with physical disabilities. Persons with developmental disabilities are individuals with mental or physical disabilities or a combination of mental and physical conditions resulting in significant impairments to daily functioning, including mental retardation, autism, traumatic brain injury, fetal neurological disorders, epilepsy, and cerebral palsy. The disability's origin is in the brain and is usually established early in life and the disability must be expected to last indefinitely. Persons living with developmental disabilities in Cleveland, TN include individuals who have hearing, vision, cognitive, developmental, ambulatory, self-care, or independent living difficulties, and many individuals have multiple difficulties.

The 2013 - 2017 ACS five-year estimate reports there were approximately 6,204 persons with disabilities in Cleveland, TN representing 15.10% of the total civilian noninstitutionalized population. Of this total, 2,900 were elderly disabled, representing 39.90% of the disabled population. Ambulatory difficulties represent 12.60% of the total population but consume over 28% of the disabled population. 8.00% of the disabled population identified as having a cognitive difficulty. Additional services to help developmentally disabled persons stay with their families as well as additional housing and residential facilities would be welcomed. Other needed services include vocational services, social and community involvement, and transportation.

Veterans

Cleveland is home to 2,478 veterans, 20.80% of whom are elderly. The veteran population is more financially stable than the general population. The median income for the veteran population is \$28,217. One fifth of the general population is below poverty compared with only 10.4% of veterans.

Domestic Violence

Domestic violence affects families and communities. The Bureau of Justice Statistics defines domestic violence as victimizations committed by intimate partners (current or former spouses, boyfriends, or girlfriends), immediate family members (parents, children, or siblings), and other relatives. The local domestic violence program supports **hundreds** individuals in the community annually. The individuals they serve have a variety of needs as a result of the violence that they

have experienced. Legal services, including divorce and child custody representation and assistance with obtaining orders of protection is offered. There is not a way to track domestic violence statistics for victims who may have sought assistance from sources outside of the local program such as through a private attorney, local mental health providers, etc.

What are the housing and supportive service needs of these populations and how are these needs determined?

Many of the supportive needs of these subpopulations are available through existing nongovernmental organizations. However, there is a strong need for greater collaboration and education among local government agencies and nonprofits to serve the various special needs subpopulations more efficiently and comprehensively. These needs were determined by input from both service providers and the public through the Needs Assessment survey, public meetings, and stakeholder interviews.

The primary housing and supportive needs of these subpopulations include affordable, safe housing opportunities in areas with access to transportation, commercial and job centers, social services, and for education regarding fair housing rights and actions that can be taken in the event those rights are violated. Elderly citizens, especially those that have a disability, may need in-home services, access to a senior center, transportation assistance, and/or care coordination. Persons with disabilities often require accessible features and ground floor housing units, transportation assistance, support programs, counseling, job training, and/or education opportunities. Victims of domestic violence need safe housing, removal of barriers to relocation, and for perpetrators to be held accountable, medical assistance, legal assistance, job readiness courses, childcare, and/or transportation assistance.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Persons living with HIV/AIDS

HIV stands for “human immunodeficiency virus.” It is a virus that can only infect humans and leads to the weakening of the immune system. The immune system is the body’s system for fighting disease. When it is compromised or weakened, a person becomes vulnerable to all kinds of bacteria, viruses, or other agents that cause disease. HIV is the virus that causes AIDS. It damages your immune system, making it easier for you to get sick. HIV is spread during sex, but condoms can help protect you.

The most recent data for year 2023 for the Cleveland, TN, area states approximately 126 persons were living with HIV. The HIV statistic is undifferentiated and includes all HIV stages. Case surveillance data provides the basis for understanding the burden of HIV and is used to guide public health action at the federal, state, and local levels. Knowing how many people are diagnosed with HIV infection each year, and their stage of disease at diagnosis, is important for planning and resource allocation and for monitoring trends and disparities between groups.

Similarly, monitoring HIV incidence is critical for allocating resources and evaluating the effectiveness of HIV testing and other prevention programs. Improved surveillance methods allow resources to be better directed for programs and resources to the populations most affected.

Data Source: <https://www.statimetric.com/hiv/city/Cleveland,%20TN>

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Not applicable. Cleveland, TN is not a recipient of HOME funds from the U.S. Department of Housing and Urban Development.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

The Department of Development & Engineering Services, Community Block Grant office is committed to developing effective investment strategies to meet the needs using the City of Cleveland’s Community Development Block Grant. Each community facility has location and service levels that need to be evaluated based on land area required, demographics of residents it serves and relationship to other city facilities and parks. The continued population growth mandates the need for additional public facilities to meet the needs of the increased population.

HUD identifies publicly owned facilities and infrastructure such as streets, playgrounds, and underground utilities, and buildings owned by non-profits that are open to the public, as Public Facilities and Improvements under the CDBG program. Publicly owned community facilities include a wide range of recreational uses, including recreation and aquatic centers, senior centers, libraries, specialty parks, and event plazas. Public facilities and the services provided within them are an integral part of our community. These facilities offer a specific stand-alone use, though they can be located within or adjacent to public parks sharing facilities to integrate related programming. Many of these public facilities provide services primarily (and sometimes exclusively) to the LMI community.

How were these needs determined?

In preparing the Consolidated Plan, the Cleveland Administration, Community Block Grant office consulted with several sources to determine these public facilities' needs that included the public, other City departments, and county and adjacent governments, and private service agencies.

To solicit online feedback from stakeholders regarding the Consolidated Plan, the city conducted a resident needs survey via the SurveyMonkey platform. This platform has a mobile-friendly interface that allows stakeholders to easily access the survey from a computer or any type of mobile device, including a cell phone. The survey was made available in both English and Spanish.

Describe the jurisdiction’s need for Public Improvements:

Cleveland plans to promote “development that leverages and protects the public’s investment in major green infrastructure and natural resources. The City’s strategy is to connect and integrate health, affordable housing, economic development, education, transportation, arts and culture, and equitable neighborhood revitalization. When citizens were asked to prioritize the expenditure of funds for public improvement projects, Cleveland residents indicated that streets, roads, and sidewalk improvements were their highest priorities followed closely by public safety offices. Leveraging public and private funds can help to expedite the process and completion of future public improvement projects.

A suitable living environment supports the quality of life of individuals and communities and can be improved by increasing the livability of neighborhoods. Remedies include eliminating blight,

increasing access to quality facilities and services, restoring, and preserving properties of special historic, architectural, or aesthetic value, and conserving energy resources. All these actions support quality of life improvement. In consultation with the public and interested parties, and based on past results, the City plans to address the jurisdiction's public facilities needs by constructing and/or rehabilitating neighborhood facilities including streets.

How were these needs determined?

In preparing the Consolidated Plan, the Cleveland Department of Development & Engineering Services, Community Block Grant office consulted with several sources to determine these public facilities' needs that included the public, other City departments, and county and adjacent governments, and private service agencies.

To solicit online feedback from stakeholders regarding the Consolidated Plan, the city conducted a resident needs survey via the SurveyMonkey platform. This platform has a mobile-friendly interface that allows stakeholders to easily access the survey from a computer or any type of mobile device, including a cell phone. The survey was made available in both English and Spanish.

Describe the jurisdiction's need for Public Services:

Many factors influence an assessment of a city's public service's needs, including geography, socioeconomic issues, existing facilities and services, migration trends, natural disasters, and other situations at least partially beyond local control. Eligible public services include, but are not limited to, homeless services, education and workforce development programs, homebuyer counseling, elderly care and programs, and childcare and health services. Another important unmet community service need identified is mental health services.

The following public service activities have been identified as a need in the city.

- Affordable Housing
- Housing Repair/Rehabilitation
- Homebuyer Education & Subsidies
- Public Facilities/Infrastructure Improvement
- Homeless Supportive Services
- Senior Services
- Job Training and Employment Skills
- Code Enforcement

How were these needs determined?

In preparing the Consolidated Plan, the Cleveland Department of Development & Engineering Services, Community Block Grant office consulted with several sources to determine these public facilities' needs that included the public, other City departments, and county and adjacent governments, and private service agencies.

To solicit online feedback from stakeholders regarding the Consolidated Plan, the city conducted a resident needs survey via the SurveyMonkey platform. This platform has a mobile-friendly interface that allows stakeholders to easily access the survey from a computer or any type of mobile device, including a cell phone. The survey was made available in both English and Spanish.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The City of Cleveland is experiencing growth and anticipating growth due to regional economic development pressures. With new jobs appearing in the city and the region, housing and infrastructure needs will increase. Although much of the vacant land needed for growth is in North Cleveland, there may be opportunities for redevelopment in South Cleveland where the Whirlpool plant was located. Although the City and its partners have made major strides in disseminating information on Fair Housing and Fair Housing laws, with most of the housing in Cleveland identified as renter occupied, property owners, landlords, and new tenants will need continuous education and training on state fair housing and landlord-tenant laws.

Homelessness and special needs facilities needs may also increase with the increase in population, while the funding for service providers may be decreasing. Public-private partnerships will continue to be an important factor in addressing needs of the city for these services, as well as, non-housing community development needs.

Cleveland's housing market may need more rehabilitation efforts than new construction activities. There is a need for affordable housing opportunities throughout the city, which may require shift in focus from area private developers and nonprofit developers. With an older housing stock, rehabilitation, demolition, and redevelopment opportunities should be a focus for the city.

While housing opportunities can be limited by household income and purchasing power, the lack of affordable housing options can result in a significant hardship for low-income households, preventing them from meeting other basic needs. Low-income residents often have fewer financial resources available for making monthly rent or mortgage payments. Those low-income residents who do choose to purchase a home must keep even more funds available for taxes, insurance, homeowners association fees, and home maintenance and repairs. Because home ownership requires significant investment for most residents, many low- and moderate-income households choose to rent their homes as opposed to purchasing one. Under most residential property leases, this option calls for less responsibility and less investment from the home occupant than if they were to purchase a home.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

The following tables reflect the cost of both owner and renter-occupied housing in the City. These tables use 2013-2017 ACS data from HUD’s eCon software. There have been significant changes in housing prices in recent years which are not fully captured in this data and will be discussed at the end of this section.

Data provided by the 2013-2017 ACS, as shown in following tables reveals that 11,160 or 60% of Cleveland’s housing stock was of single-family configuration with attached and detached unit structures. The remaining housing stock was in a variety of multi-family configurations, ranging from 2-4 unit structures to structures with 20 or more units.

Of the 8,029 owner-occupied units in the City, 82% consist of three or more bedrooms. While renter-occupied units only consist of 25% of three or more bedrooms. No bedroom, one-bedroom, and two-bedroom units are the smallest category of owner-occupied housing, but most renter households (75%) live in these types of units.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	10,180	55%
1-unit, attached structure	980	5%
2-4 units	3,275	18%
5-19 units	2,365	13%
20 or more units	910	5%
Mobile Home, boat, RV, van, etc	785	4%
Total	18,495	100%

Table 26 – Residential Properties by Unit Number

Data Source: 2013-2017 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	50	1%	325	4%
1 bedroom	29	0%	1,270	14%
2 bedrooms	1,375	17%	5,140	57%
3 or more bedrooms	6,575	82%	2,222	25%
Total	8,029	100%	8,957	100%

Table 27 – Unit Size by Tenure

Data Source: 2013-2017 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The City administers a variety of housing related programs to assist low- and moderate-income residents to afford and maintain housing. These programs are funded primarily through federal Community Development Block Grant Program. The City utilizes these federal funds to address the priority needs and specific objectives identified in the Consolidated Plan.

The lack of affordable housing in the City is a major obstacle for residents. This lack of affordable housing particularly affects low- and moderate-income households, seniors, people with disabilities, single head of households, and young adults. To foster the development of affordable housing, the City operates a Homeowner Housing Rehab and Homeownership Assistance programs.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

According to the National Low Income Housing Coalition’s National Housing Preservation database on expiring project-based rental assistance (PBRA), which includes project-based Section 8, Section 202, LIHTC, and HOME, there are 815 units in the City at-risk for conversion to market-rate units. In the absence of intervention to preserve the affordability of these units, this would occur when the rental assistance or affordability period expires within the next five years.

Property Name	Property Address	City	State	Zip	County	Census Tract	Property Status	Total Units	Earliest Start Date	Earliest End Date	Latest End Date
LIFE CARE CENTER 29 CLEVELAND	3530 Keith St NW	Cleveland	TN	37312-4309	Bradley	47011010201	Active	130	6/1/2002	6/23/2034	5/1/2035
CHEROKEE HILLS APARTMENTS	2020 Bates Pike SE	Cleveland	TN	37311-6390	Bradley	47011010800	Active	96	1/1/1998	1/1/2046	1/1/2046
PARKTOWNE APARTMENTS	2005 Westland Dr SW	Cleveland	TN	37311-8172	Bradley	47011010700	Active	84	1/1/1998	1/1/2028	1/1/2028
SPRING LAKE APARTMENTS	1525 Spring Place Rd SE	Cleveland	TN	37311-3299	Bradley	47011010800	Active	64	1/1/2008	1/1/2038	1/1/2038
BRADLEY PLACE APARTMENTS	435 Kile Ln SW	Cleveland	TN	37311-7100	Bradley	47011010700	Active	80	1/1/1999	1/1/2029	1/1/2029
FOREST GROVE	2350 Blackburn Rd SE	Cleveland	TN	37311-7739	Bradley	47011010700	Active	96	1/1/1997	1/1/2027	1/1/2027
THE PRESERVE AT HARDWICK	4921 N Lee Hwy	Cleveland	TN	37312-4125	Bradley	47011011203	Active	80	1/1/2016	1/1/2046	1/1/2046
CLEVELAND BRADLEY/231 DOOLEY	231 Dooley St NE	Cleveland	TN	37311-5551	Bradley	47011010400	Active	1	2/20/2012	2/20/2032	2/20/2032
CLEVELAND-BRADLEY/135 FAIR	135 Fair St SE	Cleveland	TN	37311-2883	Bradley	47011010800	Active	2	5/10/2010	5/10/2030	5/10/2030
CLEVELAND-BRADLEY/POLK CO AV	174 Polk County Ave NE	Cleveland	TN	37311-4777	Bradley	47011010300	Active	1	2/26/2007	2/26/2027	2/26/2027
CLEVELAND-BRADLEY/1830 CLINGAN	1830 Clingan Dr NW	Cleveland	TN	37311-1123	Bradley	47011011402	Active	1	5/11/2010	5/11/2025	5/11/2025
CLEVELAND-BRADLEY/POLK CO AVE	184 Polk County Ave NE	Cleveland	TN	37311-4777	Bradley	47011010300	Active	1	2/26/2007	2/26/2027	2/26/2027
CLEVELAND-BRADLEY/1904 WESTSIDE	1904 Westside Dr NW	Cleveland	TN	37311-1155	Bradley	47011010600	Active	1	5/11/2010	5/11/2025	5/11/2025
LIFE BRIDGES INC 2021 GLENWOOD DRIVE NW	2121 Glenwood Dr NW	Cleveland	TN	37311	Bradley	47011010600	Active	3	11/23/2011	11/23/2026	11/23/2026
LIFE BRIDGES INC 2311 WOLFE DRIVE NW	2311 Wolfe Dr NW	Cleveland	TN	37311-3757	Bradley	47011010600	Active	3	11/23/2011	11/23/2026	11/23/2026
CLEVELAND BRADLEY/241 DOOLEY	241 DOOLEY ST	CLEVELAND	TN	37311	Bradley	47011010400	Active	1	2/20/2012	2/20/2032	2/20/2032
CLEVELAND-BRADLEY/250 GAUT	250 Gaut St NE	Cleveland	TN	37311-5563	Bradley	47011010400	Active	1	2/27/2007	2/27/2027	2/27/2027
CLEVELAND-BRADLEY/260 GAUT	260 Gaut St NE	Cleveland	TN	37311-5563	Bradley	47011010400	Active	1	5/10/2010	5/10/2025	5/10/2025
CLEVELAND - BRADLEY HC/270 GAUT	270 Gaut St NE	Cleveland	TN	37311-5563	Bradley	47011010400	Active	1	8/21/2010	8/21/2030	8/21/2030
	335 16th St SE	Cleveland	TN	37311-3112	Bradley	47011010700	Active	1	8/21/2010	8/21/2030	8/21/2030
	341 16th St SE	Cleveland	TN	37311-3112	Bradley	47011010700	Active	1	5/11/2010	5/11/2025	5/11/2025
LIFE BRIDGES 3510 PINECREST	3510 Pinecrest Ave NW	Cleveland	TN	37312-1939	Bradley	47011011403	Active	3	9/8/2015	9/8/2030	9/8/2030
SAMUEL MELTON COOPER ELD	1601 Clemmer St NE	Cleveland	TN	37311-4570	Bradley	47011010400	Active	163	8/31/1971		

Cleveland in collaboration with the Cleveland Housing Authority will continue to monitor this database over the next five years to assess if any units could be lost due to expiring contracts and what actions the city can take to preserve these unit.

Does the availability of housing units meet the needs of the population?

Census data was used to assess the ability of the City’s current housing stock to meet the needs of its population. As a result, it was apparent that the CHAS data analyzed in the Needs Assessment, reflects more renters than owners who experience one or more housing problems. However, cost burden is a problem for both owners and renters, in which affordability is a major barrier for most residents in the city.

Describe the need for specific types of housing:

There is a need for safe, sanitary, accessible, and affordable housing throughout the City. Specifically, there is a strong need for housing affordable to households earning less than 50% of the median income, and practical options are needed to ensure the availability of accessible units for the elderly and people with physical disabilities.

Approximately 55% of the housing units in the city are 1-unit detached structures. Additional types of rental and owner-occupied housing may need to be provided to allow for diversity in the market. Homeownership opportunities are needed for low to moderate income units, as well as affordable rental units for the elderly, disabled, and large families.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

The following tables reflect the cost of both owner and renter-occupied housing in the City of Cleveland. These tables use 2013-2017 ACS data from HUD’s eCon Software. The HUD-provided table below indicates the number of affordable units available to households with various income levels. The 640 rental units identified as affordable to households below 30% of the HUD-adjusted Median Family Income (HAMFI) represent 7.44% of the rental housing inventory in the city. This limited supply of affordable units cannot accommodate the number households earning less than 30% of HAMFI.

In the Cleveland MSA, the 2023 Fair Market Rent (FMR) for a two-bedroom apartment was \$931. To afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$3,103.33 monthly or \$37,240 annually. Assuming a 40-hour work week, 52 weeks per year, a resident must work 2.5 full-time jobs at minimum wage (\$17.90 per hour) to afford a two-bedroom unit. The monthly rent affordable at minimum wage for a 40-hour work week in the city is \$602, about two-thirds of the actual Fair Market Rent.

According to the 2013-2017 ACS estimates, the median home values increased to \$175,100, a 10% change between 2009 and 2017. The amount of rent paid by residents in Cleveland demonstrates that 58.5% of persons pay between \$500 and \$999 per month, while 30.1% of residents pay less than \$500 per month. Additionally, the Housing Affordability table also shows that there were only 640 units, or 7.4%, available to households earning below 30% of the City’s HUD Area Median Family Income (HAMFI).

Cost of Housing

	Base Year: 2009	Most Recent Year: 2017	% Change
Median Home Value	159,400	175,100	10%
Median Contract Rent	525	611	16%

Table 28 – Cost of Housing

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	2,694	30.1%
\$500-999	5,235	58.5%
\$1,000-1,499	925	10.3%
\$1,500-1,999	90	1.0%
\$2,000 or more	10	0.1%
Total	8,954	100.0%

Table 29 - Rent Paid

Data 2013-2017 ACS
Source:

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	640	No Data
50% HAMFI	2,270	409
80% HAMFI	5,695	1,621
100% HAMFI	No Data	2,542
Total	8,605	4,572

Table 30 – Housing Affordability

Data 2013-2017 CHAS
Source:

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$789	\$848	\$1,114	\$1,462	\$1,529
High HOME Rent	\$661	\$707	\$931	\$1,134	\$1,245
Low HOME Rent	\$605	\$648	\$777	\$898	\$1,002

Table 31 – Monthly Rent

Data HUD FMR and HOME Rents
Source:

Is there sufficient housing for households at all income levels?

No. According to CHAS estimates, there are 3,249 renters with incomes under 50% HAMFI, but only 2,910 rental units affordable at that income level as reported in Table 35. Turning to owners, there are an estimated 584 owner households with incomes at or below 50% HAMFI in Thus, there is insufficient housing for households with very low to low incomes. These figures do not consider unit condition or size; nor do they reflect the possibility that a unit that would be affordable to a low- or moderate-income household may be unavailable to them because it is occupied by a higher income household.

How is affordability of housing likely to change considering changes to home values and/or rents?

Affordability in Cleveland is likely to decrease if local housing market recovery continues to outpace the broader economic and employment recovery. According to Table 33, between 2009 and 2017 the median home value and median contract rent in the City of Cleveland increased by 16%. Over the same period, the median household income has only increased in terms of real

dollars by 21% for households. This means that housing has become less affordable overall during the past ten years. If these trends continue, then housing affordability will become an even higher barrier for low to moderate income City residents.

The median list price for owner-occupied homes in Cleveland in January 2024 was \$350,805, up 19.2% over the previous year, and the median list monthly rent was \$1,532, a \$32 increase since 2023. (Source: www.Zillow.com) Another compounding factor adversely affecting affordability is unit vacancy rate. According to 2022 ACS estimates, the rental unit vacancy rate is under 3%. The owner-occupied unit vacancy is only rate is 1.7%.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

High HOME rent and Fair Market Rent for two-bedroom units in the Cleveland MSA are the same as the Area Median Rent. However, the area median rent exceeds the Fair Market Rent for units larger than three bedrooms. As detailed above, housing costs in the City have steadily increased at much faster rates than incomes. As housing construction and rehabilitation costs rise, it will be increasingly difficult to produce affordable housing. This means that greater subsidies will be required to ensure that housing remains affordable, particularly to very low and extremely low-income households.

Discussion

As housing costs continue to rise, so does the demand for housing that is affordable to low-income households, particularly rental housing for the very low and extremely low-income households. The City will need to consider new and innovative ways to meet this demand.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The age and condition of a City’s housing stock are important variables in assessing the overall characteristics of the local housing market. This section will review important data about the Cleveland’s housing stock. The older housing stock, particularly older rental housing, often has code and deferred maintenance issues that can impact the longevity of the housing structure which in turn impacts the housing supply in terms of accessibility and affordability.

Definitions

The 2013-2017 ACS estimates that out of 8,040 owner-occupied households and 8,955 renter occupied households, at least 1,240 (15%) of owners and 3,945 (44%) of tenants had a least one of the following four selected housing conditions: 1) overcrowding, 2) lack complete kitchen, 3) lacks complete plumbing, or 4) cost burden. Overcrowding is defined by HUD as 1.01 to 1.50 person per room, while severe overcrowding is 1.51 or more persons per room. HUD data on the numbers of persons residing in housing units provides some insight into the potential for homelessness.

When households spend too much of their incomes on housing, they are cost burdened or severely cost burdened. Using definitions established by HUD, cost burden is calculated as gross housing costs, including utility costs, as a percentage of gross income. Households that pay more than 30% of their incomes on housing are considered cost burdened; households that pay more than 50% of their incomes are severely cost burdened. Cost burdened households will find it difficult to meet all household needs; severely cost burdened households may be in danger of homelessness.

The U.S. Census estimates the total number of substandard units in a geographic area by calculating both owner- and renter-occupied units: 1) lacking complete plumbing facilities, 2) lacking complete kitchen facilities, and 3) 1.01 or more persons per room (overcrowding). The U.S. Census defines “complete plumbing facilities” to include: (1) hot and cold piped water; (2) a flush toilet; and (3) a bathtub or shower. All three facilities must be in the housing unit.

Another factor to consider when discussing the condition of housing stock is the age of the housing stock. For the purposes of this analysis, rental property located in a low-income neighborhood older than 30 years is considered as “older housing stock.”

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	1,240	15%	3,945	44%
With two selected Conditions	35	0%	155	2%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	6,765	84%	4,855	54%
Total	8,040	99%	8,955	100%

Table 32 - Condition of Units

Data 2013-2017 ACS
Source:

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,080	26%	1,865	21%
1980-1999	1,655	21%	3,135	35%
1950-1979	3,610	45%	3,335	37%
Before 1950	704	9%	614	7%
Total	8,049	101%	8,949	100%

Table 33 – Year Unit Built

Data 2013-2017 CHAS
Source:

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	4,314	54%	3,949	44%
Housing Units build before 1980 with children present	1,302	16%	342	4%

Table 34 – Risk of Lead-Based Paint

Data 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)
Source:

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 35 - Vacant Units

Need for Owner and Rental Rehabilitation

The age of the housing stock in the City will continue to have a significant impact on general housing conditions in the area. The CHAS data shows that 45% of the City's housing stock was built prior between 1950-1979. Owner and renter households, especially those located in low-income target neighborhoods will need rehabilitation assistance to maintain their homes. As housing ages, maintenance costs rise, which can present significant costs for low- and moderate-income homeowners. This also poses a threat to low- and moderate- income tenants who are not able to maintain close communications with their landlords or property managers who may be out of state when repairs are needed. Due to the limited amount of funding for a strategic approach to demolition and rehabilitation, additional resources and measures may need to be taken to resolve this issue. Greater attention of this issue by city departments, neighborhood organizations, and other interested organizations may require a strategic plan of action in the future.

Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP

Exposure to lead-based paint represents one of the most significant environmental threats from a housing perspective. Lead is a highly toxic metal that may cause a range of health problems for adults, and especially for children. The major source of lead exposure comes from lead-contaminated dust found in deteriorating buildings. Many residential properties built before 1978 contain lead-based paint. Unfortunately, measuring the exact number of housing units with lead-based paint hazards is difficult. HUD regulations regarding lead-based paint apply to all federally assisted housing. Low-income households that earn between 0-50% Median Family Income (MFI) are least able to afford well maintained housing and, therefore, are often at greater risk of lead poisoning. According to the CHAS Estimates, the City has an estimate of 4,300 housing units built before 1978, which may be at risk of lead exposure. A majority of the low- or moderate-income families reside in South Cleveland which is also an area with a high concentration of homes built prior to 1978.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Cleveland Housing Authority (CHA), chartered in 1959 pursuant to the Tennessee Housing Authorities Law, is a public non-profit corporation which carries out public housing and urban development programs as its primary activities. The Housing Authority's mission is to provide affordable decent, safe, and sanitary housing opportunities to low- and moderate-income families, including elderly and handicapped persons, while supporting programs to foster economic self-sufficiency.

CHA provides housing assistance to over 600 families each month through the Public Housing and Housing Choice Voucher Programs.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
						Veterans Affairs Supportive Housing	Family Unification Program	Disabled *	
# of units vouchers available			434	208			0	0	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 36 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

The Cleveland Housing Authority currently owns and manages 420 public housing apartments spread over 14 different locations in the City of Cleveland, Tennessee and has a waiting list for each bedroom size ranging from Efficiency/Studio apartments to large 5-bedroom apartments.

PHA's use income limits developed by HUD to determine applicant eligibility. HUD sets the lower income limit at 80% of the median income for the local metropolitan area and very low-income limit at 50% of the median income. However, 75% of those admitted to public housing must have incomes less than 30% of the area median income.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Annual Plan provides details about the housing authority's immediate operations, program participants, programs and services, and the housing authority's strategy for handling operational concerns, residents' concerns and needs, programs and services for the upcoming fiscal year.

Public Housing Condition

Public Housing Development	Average Inspection Score
TVHS	84

Table 37 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Many of the public housing units in the city were built prior to the American Disabilities Act requirements. These units were built as walk-up units and now require major accessibility and modernization upgrades to property. There is a demand for elderly and disabled housing units in the city. Undulating local terrain and limited funding add constraints to providing the number of units needed for this demand. Additionally, large families in the city are difficult to house due to the limited number of units available for those families. Due to the limited elderly and disabled housing units in the city, public housing units may be a niche market for that style of housing. Additional units will be required to fulfill the needs of the city requiring the CHA to possibly demolish or reposition units to meet the demand.

Additionally, deconcentrating public housing units is a goal of the CHA. This will require the acquisition of additional properties and the reprogramming of existing units to meet the needs of existing tenants as well as potential tenants.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

High energy costs in multifamily housing make it difficult to sustain affordable rental housing for low-income families. Utility costs are the largest variable operating expense for affordable multifamily buildings. Reducing operating expenses in these buildings helps maintain affordability and frees up capital that can be used toward maintenance repair needs or resident services.

Cleveland Housing Authority (CHA) manages a portfolio of 420 apartments across 14 locations in Cleveland, Tennessee. To secure financing for energy and water efficiency retrofit measures, CHA initiated an Energy Performance Contract (EPC) through HUD's EPC program. Once approved by HUD, CHA used EPC funds to implement a series of measures to improve the energy and water efficiency

of its portfolio, leading to a direct reduction in overall utility expenses and creating cost savings for CHA's low-income residents. These improvements led to resident utility savings of over \$486,800.

In 2015 CHA began exploring options for an EPC, a financing technique that uses future utility cost savings from the installation of energy and water conservation improvements to repay the costs of the installation. In late 2016 CHA received HUD approval for a portfolio-wide EPC and joined the Better Buildings Challenge to pledge a 20% reduction in energy consumption within 10 years.

CHA's first step in this process was to convert all its public housing units from owner-paid to tenant-paid utilities. To do this CHA implemented an "Interim Rent Adjustment" for each tenant, allowing them to receive a reduction in their monthly rent amount equal to the utility allowance for their unit. Over a 12-month period, CHA staff met with each tenant to explain the rent adjustment and provide education on energy- and cost-saving resident best practices.

In Cleveland, the EPC has been in place since January 1, 2019. CHA achieved a 21% EUI reduction against its 2016 baseline, becoming a Goal Achiever in the Better Buildings Challenge in 2020. The first-year results showed resident-paid utility savings of \$238,500 and the second-year results showed savings of \$248,295, for a total savings to date of \$486,795.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The City of Cleveland works with the Cleveland Emergency Shelter to meet the needs homeless persons and families. One of the three priority goals of the Cleveland Emergency Shelter is to create transitional and supportive housing opportunities. The other key feature is the provision of support services by a skilled staff at or very near the housing site that are designed to be flexible and responsive to the need of the individual. By providing these two components, supportive housing addresses homelessness at its root causes. Future plans for a transitional shelter will ensure providers are better equipped to enable the homeless to move from a shelter situation to a more independent living arrangement in a unit of their own is on their agenda. There is also concern over the lack of adequate accommodations for the chronic homeless that experience recurring episodes of homelessness for longer periods of time.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	340	0	72	0	0
Households with Only Adults	2,661	0	730	0	0
Chronically Homeless Households	686	0	2	0	0
Veterans	225	0	256	0	0
Unaccompanied Youth	183	0	23	0	0

Table 38 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The City of Cleveland encourages all service providers to work collaboratively to integrate grant funded programs with mainstream services for persons that are homeless or at-risk of homelessness to maximize the benefit for clients and ensure their long-term sustainability. There is a myriad of mainstream services that are available to the community, as well as persons experiencing homelessness. These programs address housing and service needs of homeless individuals and families by offering beds and a variety of much needed services.

The Continuum of Care host monthly meetings for homeless providers to network with each other and strategize on how to collaborate and collectively serve homeless persons. Through the Coordinated Entry System (CES) program a central point to determine the housing and social service needs of homeless persons has been provided. CES is designed to account for the diversity of needs of people experiencing homelessness, urgently responds to these needs with permanent housing solutions, and successfully incorporates the housing, healthcare, and employment systems. Other agencies work in concert with our homeless service providers to provide services tailored for everyone that needs such assistance. Services provided include job placement / training, emergency housing, mental health services, and general health services.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Homeless services providers make every effort to connect participants with mainstream resources such as employment assistance, mental health counseling, healthcare assistance, transportation benefits, Supplemental Nutrition Assistance Program (SNAP) benefits, and addiction counseling. There are a myriad of comprehensive services that are available to the community as a whole, as well as persons experiencing homelessness. Cleveland's efforts to combat homelessness requires that the root economic causes of homelessness be addressed, which includes insufficient numbers of decent, safe, and sanitary low-cost housing units (limited housing stock) combined with limited financial capacity of homeless households (low wage jobs, depleted savings, excessive debt).

The following list of services and facilities are specifically targeted for the homeless including those specifically targeted to special needs populations experiencing homelessness:

Responsible Entity	Geographic Area Served
Bradley Cleveland Community Services Agency - Cleveland Emergency Shelter	The Emergency Services program provides short term assistance to low-income households that have immediate needs with an essential item. The Emergency Assistance Services is not designed to provide on-going support, only to fill a specific gap created beyond the control of the customer.
Tennessee Housing Development Agency	THDA administers the federally-funded Emergency Solutions Grants (ESG) Program to help improve the quality of emergency shelters for the homeless; to help meet the costs of operating and maintaining emergency shelters; to provide essential services so that homeless individuals have access to the assistance they need to improve their situation; to provide street outreach services to the homeless; and to provide emergency intervention assistance and rapid re-housing services to prevent homelessness and to obtain permanent housing.
Family Promise of Bradley County	This program is designed to help families going through crisis situations and keep them housed.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

The City of Cleveland a limited range of supportive services for special needs populations. Persons who are not homeless but have special needs may need special facilities and services to facilitate a better life for them and their families. The city has a network of providers that deliver housing and supportive services to people who are elderly or frail elderly, people with mental, physical and/or developmental disabilities, and people with substance abuse addictions.

Cleveland does not receive funding through the Housing Opportunities for Persons with AIDS Program (HOPWA); however, the city has a provision of affordable housing options and the prevention of homelessness for individuals with HIV/AIDS.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

The elderly and frail elderly have the most significant housing needs that include physical, medical, maintenance, social, emotional, and financial needs. Elderly and frail elderly are often unable to maintain existing homes or to afford rent. Housing cost burden related issues are often compounded by the requirement of additional services it takes for elderly and frail elderly to age in place. Frail and elderly people typically reside in older housing that require renovations that make their lives easier such as wider doorways, handicapped ramps, lower countertops and retro-fitted bathrooms. There is also a great need for support services that may include transportation services, meal delivery, and social programs, medical supplements, and other daily living assistance services. As the population continues to age, the need for age- related services increases.

Persons with mental illness, developmental disabilities, and addiction issues have characteristics that are similar in nature. Mentally ill and persons with addiction issues need housing that makes supportive services easily accessible. Their housing needs most often fall into a group setting, with a case manager or residence manager in close proximity. Those with addiction issues often can transition to permanent housing once they are free of their addictions. They often obtain gainful employment and become fully self-sufficient. Those with developmental disabilities have housing needs that falls into the category of group homes where a residence manager can closely monitor their activities.

HIV/AIDS patients can live independently. Their housings need are based more on affordability and accessibility. This is particularly true if their illness/condition, precludes them from working steadily and they are living on a fixed income. Supportive service needs are mainly transportation related.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Local service providers are well-networked and often make referrals to one another to provide shelter, temporary food, clothing, and other immediate services to ensure that persons returning from mental and physical health institutions receive appropriate supportive housing. Persons with mental and developmental disabilities often need alternative living arrangements that may include supervision, in-home support services, respite services, transportation services, day program services, educational services, and supported employment services. Supportive housing is frequently a need for people with mental health and substance abuse disorders after being discharged from inpatient treatment to prevent homelessness.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City of Cleveland will continue to support organizations that provide food assistance, homelessness prevention, clothing, and referral assistance. The city provides service providers with the opportunity to apply for funding for Public Services and/or Public Facilities to support the city's goal of providing service to low-to-moderate income residents. The grant process is competitive, therefore the organizations and the needs they meet vary from year to year. The city partners with local organizations to assist people with chronic disabilities who experience homelessness in addition to emergency shelter and supportive services to persons experiencing domestic violence traumas.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Refer to the response above.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City of Cleveland is currently undertaking an Analysis of Impediments to Fair Housing Choice (AI) during this Consolidated Plan process that will identify any barriers that currently exist in the city for fair housing purposes and provide recommendations for any zoning changes that can remove any barriers to affordable housing.

Due to this ongoing analysis the following list of factors cannot be considered exhaustive but outlines some of the important obstacles to providing affordable housing in the city. It should be noted, non-governmental barriers, primarily market factors such as elevated land costs and construction costs, and high prevailing market prices for housing, have been the primary challenges facing jurisdictions in the region, including Cleveland, in recent years, not public policies. These barriers are addressed, within the City's limited ability to address them, through the housing activities listed in the City's Annual Action Plan and through the goals and policies listed for affordable housing.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

This section of the Consolidated Plan will analyze the non-housing community development assets of the City of Cleveland and describes the local workforce, the nature of current employment, and activities that coordinate economic development activities across local and regional agencies. The City of Cleveland has not used CDBG funding for economic development however they do recognize the need to foster a competitive local economy that expands economic opportunities for present and future residents

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	82	25	1	0	0
Arts, Entertainment, Accommodations	2,128	3,933	13	13	0
Construction	670	437	4	1	-3
Education and Health Care Services	2,652	5,055	16	17	0
Finance, Insurance, and Real Estate	730	1,162	5	4	-1
Information	190	156	1	1	-1
Manufacturing	3,328	8,139	21	27	6
Other Services	568	1,157	4	4	0
Professional, Scientific, Management Services	931	1,695	6	6	0
Public Administration	0	0	0	0	0
Retail Trade	2,004	4,152	12	14	1
Transportation and Warehousing	1,054	1,857	7	6	0
Wholesale Trade	453	455	3	1	-1
Total	14,790	28,223	--	--	--

Table 39 - Business Activity

Data Source: 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	22,433
Civilian Employed Population 16 years and over	21,440
Unemployment Rate	4.34
Unemployment Rate for Ages 16-24	8.58
Unemployment Rate for Ages 25-65	2.96

Table 40 - Labor Force

Data 2013-2017 ACS
Source:

Occupations by Sector	Number of People
Management, business and financial	4,655
Farming, fisheries, and forestry occupations	805
Service	2,695
Sales and office	4,575
Construction, extraction, maintenance, and repair	1,225
Production, transportation, and material moving	1,440

Table 41 – Occupations by Sector

Data 2013-2017 ACS
Source:

Travel Time

Travel Time	Number	Percentage
< 30 Minutes		
30-59 Minutes		
60 or More Minutes		
Total		

Table 42 - Travel Time

Data 2013-2017 ACS
Source:

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,325	50	1,145
High school graduate (includes equivalency)	4,060	270	1,945
Some college or Associate's degree	4,495	170	1,450

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	5,460	145	695

Table 43 - Educational Attainment by Employment Status

Data 2013-2017 ACS
Source:

Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	0	160	285	349	635
9th to 12th grade, no diploma	405	485	500	735	635
High school graduate, GED, or alternative	2,135	2,210	1,435	2,625	2,030
Some college, no degree	3,475	1,640	825	2,135	2,070
Associate's degree	254	404	459	640	439
Bachelor's degree	534	1,155	1,165	1,665	895
Graduate or professional degree	120	470	575	1,275	825

Table 44 - Educational Attainment by Age

Data 2013-2017 ACS
Source:

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	148,483
High school graduate (includes equivalency)	111,641
Some college or Associate's degree	113,095
Bachelor's degree	223,111
Graduate or professional degree	314,550

Table 45 – Median Earnings in the Past 12 Months

Data 2013-2017 ACS
Source:

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The Business Activity table above indicates that the major employment sectors in Cleveland are manufacturing (27% of jobs/21% of workers), Education & Health Care (17% of jobs/16% of workers), and Retail Trade (14% of jobs/12% of workers) .

Describe the workforce and infrastructure needs of the business community:

The City of Cleveland is committed to securing new industries by providing a complete infrastructure area dedicated to attracting businesses that will advocate the development of secure jobs that provide a living wage. To ensure a sound economic future for Cleveland, the City must attract and retain businesses in the professional, managerial, technical, financial, and manufacturing sectors with incomes at and above the regional median income. Stakeholders reported that transportation, road improvements and sidewalks were important infrastructure needs. The local economy will depend on a strong workforce skilled in the education, health care, and professional and management sector; the transportation and warehousing sector; and the wholesale trade, retail trade and utilities sector. Affordable land, abundant labor supply, and low cost of living contributes to the city's attractiveness to expanding industries.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

There are no anticipated major changes that would impact the workforce development, business support, or infrastructure needs identified in this Consolidated Plan.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Currently, the largest sector of the workforce in the city is manufacturing followed by educational services and retail trade. In all of the educational attainment levels, the majority of those in the labor force are employed. This corresponds with the level of educational attainment in the city with many residents having some college or a degree. If the skills and education of the workforce did not correspond to the needs of employment opportunities, we would expect to see lower levels of employment. The city could benefit from supporting new education models based on science, technology, engineering, and mathematics to meet the demands of new industries.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

During the next Consolidated Plan period, the City of Cleveland will continue support programs to help job seekers access employment, education, training, and support services to succeed in the labor market and match employers with the skilled workers they need to be competitive in the global economy. There are organizations in the Cleveland community that provide job skills programs, and educational opportunities. These educational and training opportunities assist the city in workforce development for jobs that are available for the citizens with greater chances for employment.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

The City of Cleveland does not participate in a Comprehensive Economic Development Strategy.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Not applicable

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

As discussed in the Geographic Priorities Section (SP-10), there are several neighborhoods where most residents are affected by multiple housing problems. Concentration is defined as areas of the city in which several occurrences of a circumstance or condition can be found in close proximity to each other. The largest housing problems in the City of Cleveland are cost burden, severe cost burden, and rehabilitation of existing aging housing stock.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of extreme poverty as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

As discussed in the Needs Assessment, an area with a minority concentration is a census tract where the population of a single minority group exceeds 50% of the total population of the census tract. The city is more concentrated in the northern portion of the city, which is where racial or ethnically diverse groups are highly concentrated.

What are the characteristics of the market in these areas/neighborhoods?

A serious defect is defined as any housing condition that poses a potential health hazard to the occupants and/or contributes to a significantly reduced quality of life due to shelter-cost burdens. Substandard housing, as defined by jurisdiction, is any unit that does not meet Southern Building Code standards due to one or more serious defects. The characteristics in these neighborhoods are the age of housing, lack of funds for investment in rehabilitation, old infrastructures, and the concentration of the population with supportive social service needs. Such defects include conditions that permit infiltration of natural elements, pests, and vermin and/or major defects or nonexistent systems including electrical systems, mechanical systems, plumbing systems or structural systems. A substantial portion of substandard housing is located within target areas composed of low to moderate-income families. These areas are served by numerous social services programs, many of which receive CDBG funding. It is hard to characterize the market of these areas and neighborhoods because they are different and spread throughout various parts

of the city. Typically, they consist of older, outdated housing that require extensive repairs to bring them up to code. There are also greater numbers of rental opportunities, and vacant or unoccupied homes in this market.

Are there any community assets in these areas/neighborhoods?

Cleveland has community assets that contribute to developing the overall quality of life in the area that include libraries, schools, parks, and several commercial/retail outlets. Community assets include not only buildings and facilities but also people, with their skills, knowledge, social networks, and relationships. Residents of Cleveland enjoy affordable housing, safe neighborhoods, high-quality healthcare, and excellent schools. The scenic landscape is a natural match for outdoor recreation, and the historic downtown offers the infrastructure for a bustling downtown area to support shopping, dining, and entertainment options.

Are there other strategic opportunities in any of these areas?

Public and private incentives are needed, as well as a collaborative effort to remove the barriers of public perception to encourage developers to invest in the areas. The availability of public transit, higher proficiency of the schools, proximity to employment, the number of vacant abandoned buildings, and downtown areas provide strategic opportunities for revitalization. Major restoration around these areas can include street repaving, drainage and street rebuilding, and sidewalk and handicap access installations.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

For many Americans, access to computers and high-speed Internet connections in an integral part of their everyday lives. As most information, services, and resources have transitioned to online access, digital inequality has a direct impact on low-income household's social inequality. Access to high-speed internet is a growing need, and lack of high-speed internet disproportionately impacts low- and moderate-income households and neighborhoods. According to HUD's Office of Policy Development, in the *Digital Inequality and Low-Income Households* Report, the disparate access to broadband can correlate with the inequality of income, education, race, and ethnicity.

As part of the 2008 Broadband Data Improvement Act, the U.S. Census Bureau began asking about computer and Internet use in the 2018 American Community Survey (ACS). Federal agencies use these statistics to measure and monitor the nationwide development of broadband networks and to allocate resources intended to increase access to broadband technologies, particularly among groups with traditionally low levels of access.

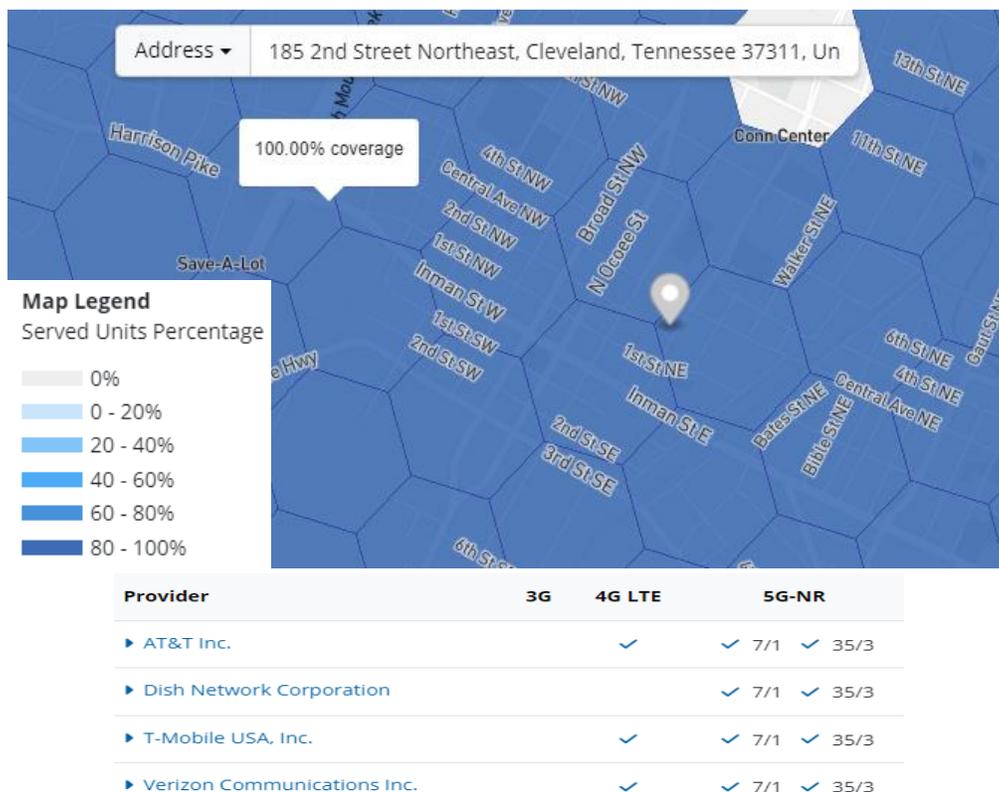
Computer and Internet Use in Cleveland, TN	2022	
	Estimate	%
Total households	17,801	(X)
Has one or more types of computing devices:		
Desktop or laptop	16,339	91.8%
Desktop or laptop with no other type of computing device	12,949	72.7%
Smartphone	652	3.7%
Smartphone with no other type of computing device	14,995	84.2%
Tablet or other portable wireless computer	1,812	10.2%
Tablet or other portable wireless computer with no other type of computing device	10,687	60.0%
Other computer	319	1.8%
	248	1.4%

Other computer with no other type of computing device	13	0.1%
No computer	1,462	8.2%
With an Internet subscription:	15,374	86.4%
Dial-up with no other type of Internet subscription	59	0.3%
Broadband of any type	15,315	86.0%
Cellular data plan	14,019	78.8%
Cellular data plan with no other type of Internet subscription	2,021	11.4%
Broadband such as cable, fiber optic or DSL	12,922	72.6%
Satellite Internet service	873	4.9%
Without an Internet subscription	2,427	13.6%
Less than \$20,000:	3,089	(X)
With dial-up Internet subscription alone	0	0.0%
With a broadband Internet subscription	1,986	64.3%
Without an Internet subscription	1,103	35.7%
\$20,000 to \$74,999:	8,313	(X)
With dial-up Internet subscription alone	52	0.6%
With a broadband Internet subscription	7,175	86.3%
Without an Internet subscription	1,086	13.1%
\$75,000 or more:	6,399	(X)
With dial-up Internet subscription alone	7	0.1%
With a broadband Internet subscription	6,154	96.2%
Without an Internet subscription	238	3.7%

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Throughout the United States, there is a significant digital divide; a gap between those who have ready access to the internet and computers and those who do not. The divide is perpetuated by limitations that are geographical as well as financial, where persons cannot afford to pay a monthly service fee for Broadband service (an internet connection fast enough to stream a video). Nationwide, less than half of households living on or under \$20,000 are connected. This lack of internet access in communities supports a deficit in opportunity, education, and other prospects.¹

The figure below shows the number of fixed broadband providers. While the figure shows the number of providers available, it does not reflect the household level usage of broadband. From a fair housing perspective, ensuring that residential broadband is available to housing projects both within and in the outskirts of the city will support community viability and improve the quality of life for residents. There are multiple broadband providers in Cleveland including AT&T, Dish Network, T-Mobile, & Verizon Communication.



¹ Vick, Karl. March 2017. The Digital Divide: A Quarter of the Nation is Without Broadband. Time. Available at: <https://time.com/4718032/the-digital-divide/>

Fixed Broadband Deployment, 2024, <https://broadbandmap.fcc.gov/>

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The Cleveland-Bradley County Emergency Management Agency is an independent department of the Bradley County Government, responsible for emergency management activities in Bradley County, and the cities of Cleveland and Charleston, reporting to the Bradley County Mayor.

Bradley County's EMA collaborates with the Tennessee Hazard Mitigation Program, which is the collective effort of many different agencies, organizations, communities, and individuals working together to lessen the impact of disasters. The efforts of this program are documented in this State of Tennessee Hazard Mitigation Plan. Generally, the risk assessments from local mitigation plans are linked with the state hazard mitigation plan as part of the regular five-year update cycle, rather than annually.

Most of Tennessee has a humid subtropical climate, with the higher elevations in the Appalachians classified as having a mountain temperate climate or a humid continental climate due to cooler temperatures. The Gulf of Mexico is the dominant factor in the climate of Tennessee, with moisture filled winds from the south being responsible for most of the state's annual precipitation. According to the State of Tennessee Hazard Mitigation Plan, from 2010 to 2012, the State of Tennessee weathered eight major disasters resulting in presidential declarations, including record-breaking floods in several Tennessee watersheds.

Changing climate and weather patterns, environmental conditions, and urban and rural development may affect the frequency and intensity of flooding in Tennessee. Although flooding events have been recorded in many parts of the state, Tennessee's western to middle regions remain most effected by such events. Additionally, according to the National Climate Assessment, the increased likelihood of extreme precipitation events due to climate change will result in greater risks of flash flooding and impacts from storm water runoff in the state.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

The State of Tennessee prioritizes rural and low income counties that have demonstrated capability to successfully plan or implement hazard mitigation projects. More often than not, mitigation projects address current or previous hazard vulnerabilities and are static in location. Local capabilities are the existing programs and policies through which local governments implement mitigation actions to reduce potential disaster losses. The local capability

assessment provides a general description of local mitigation capabilities in Tennessee and their effectiveness for mitigation.

The Tennessee Housing Development Agency has created a statewide Emergency Repair fund for the elderly. The program provides grants to low income, elderly homeowners who are 60 years or older to correct, repair, or replace an essential system and/or a critical structural problem. The purpose of the program is to stabilize the elderly homeowner's residence by making rapid, essential repairs to make the home livable. The Emergency Repair Program is administered through Tennessee's 9 development districts to help ensure that the program is available state-wide

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The purpose of the Strategic Plan is to guide the use of CDBG funds in the City of Cleveland over the next five years. The plan is guided by three overarching goals that are applied according to identified needs. The goals are:

- To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing.
- To provide a suitable living environment through safer, more livable neighborhoods, greater integration of low- and moderate-income residents throughout the City, increased housing opportunities, and reinvestment in deteriorating neighborhoods.
- To expand economic opportunities through more jobs paying self-sufficient wages, homeownership opportunities, development activities that promote long-term community viability, and the empowerment of low- and moderate-income persons to achieve self-sufficiency.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Target Area	Target Area Description
Area Name	CDBG Target Area
Area Type	Local Target Area
Other Target Area Description	N/A
HUD Approval Date	N/A
% of Low/Mod	
Revital Type:	Other
Other Revital Description	Infrastructure for affordable housing development.
Identify the neighborhood boundaries for this target area.	The CDBG Target Area for the City of Cleveland covers all or parts of five low to moderate income census tracts (all of CT 107, all of CT 104 and 108 within the city limits, and parts of 103 and 105). The area is roughly bounded by Westland Drive and Keith Street to the west; 20th Street NE to the north; Little Chatata Creek and Appalachian Highway to the east; and Appalachian Highway to the south. Downtown Cleveland is directly west/northwest of the target area.
Include specific housing and commercial characteristics of this target area.	<p>Within the CDBG eligible area there are 6,395 total housing units. Owner occupancy ranges from a high of 66% in CT 105 to a low of 16.7% in CT 104-002. The median value of owner-occupied housing ranges from \$54,200 in CT 107 to \$307,700 in CT 102-001. Gross rents ranges from \$764 in CT to \$1093 per month in CT 103-002. It is worth noting that of the tracts within the target area, CT 103-001 has the lowest median value of owner-occupied housing and most likely the lowest gross rent for rental housing.</p> <p>There are few options available for healthy neighborhood grocery stores in the area, as noted during the community input discussions. Additionally, there are few employment opportunities for area residents to travel to within the target area.</p>
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	With the city's designated CDBG target area, substantial community development improvements were successful in the past. Many of the city's partners and citizens input leaned heavily on continuing improvements in these areas. The HUD Low-Moderate income block groups was helpful in identifying the additional census tract (105) and additional block groups 102-001 and 101-004 (located to the north of the primary target area).
Identify the needs in this target area.	The needs in this area include additional affordable housing opportunities, code enforcement, public facility and infrastructure improvements, blight elimination, and brownfield revitalization.
What are the opportunities for improvement in this target area?	There are several community facility and public infrastructure improvements identified during this process that are opportunities in the area. The opportunity to continue to partner with local organizations, such as City Fields CDC, on specific neighborhood revitalization projects and homeownership programs within the CDBG Target Area will have the biggest impact overall. There are vacant and abandoned lots available also for affordable housing opportunities.
Are there barriers to improvement in this target area?	The barriers to improvement include lack of funding for housing and employment opportunities and other social issues.

Table 46 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Federal CDBG funds are intended to provide low and moderate income (LMI) households with viable communities, including decent housing, a suitable living environment and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration. The system for establishing the priority for the selection of these projects is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG program
- Meeting the needs of LMI residents or LMI areas/neighborhoods
- Coordination and leveraging of resources
- Response to expressed needs
- Sustainability and/or long-term impact
- The ability to demonstrate measurable progress and success

Priority CDBG funding areas include areas where the percentage of LMI persons is 51% or higher.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

1	Priority Need Name	Increase Access to Decent Affordable Housing	
	Priority Level	High	
	Population	Extremely Low-Income Households Low-Income Households Moderate-Income Households Large Families	Families with Children Elderly Public Housing Residents Frail Elderly
	Geographic Areas Affected	Citywide	
	Associated Goals	Homebuyer Assistance Code Enforcement Fair Housing Education Planning & Administration	
	Description	Provide down-payment assistance and rental subsidies for low-income residents to reduce housing costs. Provide code enforcement inspections for low-income homeowners. Provide fair housing education.	
	Basis for Relative Priority	Priority based on feedback through community meetings and agency interviews as well review of demographic information for the City resulted in this activity having the highest priority need. The city recognizes that as housing ages and the cost of housing increases, maintaining existing housing allows affordability to remain paramount. Additionally, income disparities are a major factor in selecting this priority basis. More than 50% of elderly households are cost-burdened and the gap is only rising as income remains flat and the cost of housing steadily increases. The research also shows that new housing added by developers is out of reach for residents who earn low wages rendering them unable to live in the community in which they work.	
2	Priority Need Name	Non-Housing Community Development	

	Priority Level	High	
	Population	Victims of Domestic Violence Elderly veterans Elderly Chronic Homelessness Persons with Physical Disabilities Families with Children Large Families Extremely Low	Low Non-housing Community Development Chronic Substance Abuse Victims of Domestic Violence Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Unaccompanied Youth Persons with Mental Disabilities Individuals
	Geographic Areas Affected	Citywide	
	Associated Goals	Infrastructure Improvements Public Facility Improvements	
	Description	Improve public infrastructure including drainage that will ensure reliance to weather, stormwater, and to mitigate flooding, water/sewer improvements, or street improvements. Acquisition, construction, or rehabilitation of public facilities to include senior centers, facilities for persons with disabilities, homeless facilities, youth centers, neighborhood facilities, parks, recreational facilities, childcare facilities, or health facilities, any public facility for use by low-income residents.	
	Basis for Relative Priority	Priority based on feedback through community meetings and agency interviews as well review of demographic information for the City resulted in this activity having a high priority need.	
3	Priority Need Name	Increase Access to Public Services	
	Priority Level	Low	

	Population	Chronic Homelessness veterans Extremely Low Victims of Domestic Violence Families with Children Persons with Developmental Disabilities Persons with Mental Disabilities Victims of Domestic Violence Individuals Low Persons with Alcohol or Other Addictions	Elderly Chronic Substance Abuse Non-housing Community Development Persons with Physical Disabilities Elderly Mentally Ill Unaccompanied Youth Large Families Families with Children Moderate
	Geographic Areas Affected	Citywide	
	Associated Goals	Provide funding support for public service programs	
	Description	Fund projects including rental assistance payments, services for the homeless, services for survivors of domestic violence, supportive services to low- and moderate-income households and persons with special needs including HIV/AIDS; recreational activities, educational opportunities, and job skills to youth; and support for job training, substance abuse treatment, mental health services, continuing education, and employment services designed to assist low- and moderate-income persons obtain jobs.	
	Basis for Relative Priority	Priority based on feedback through community meetings and agency interviews as well review of demographic information for the City resulted in this activity having a high priority need.	
4	Priority Need Name	Increase Access to Economic Development Activities	
	Priority Level	Low	

	Population	Extremely Low-Income Households Low-Income Households Moderate-Income Households	
	Geographic Areas Affected	Citywide	
	Associated Goals	Support for Economic Development Activities	
	Description	Financial assistance to private for-profit businesses to (for example) acquire property, clear structures, build, expand or rehabilitate a building, purchase equipment, or provide operating capital. Forms of assistance include loans, loan guarantees, and grants. Or, technical assistance to for-profit businesses, including workshops, assistance in developing business plans, marketing, and referrals to lenders or technical resources. Or, financial assistance, technical assistance, or general support services to owners and developers of microenterprises. A microenterprise is a business with five or fewer employees, including the owner(s).	
	Basis for Relative Priority	Priority based on feedback through community meetings and agency interviews as well review of demographic information for the City resulted in this activity having a high priority need.	
5	Priority Need Name	Affirmatively Furthering Fair Housing	
	Priority Level	Low	
	Population	Extremely Low-Income Households Low-Income Households Moderate-Income Households	Large Families Families with Children
	Geographic Areas Affected	Citywide	
	Associated Goals	Provide fair housing education.	

	Description	Provide fair housing outreach to City residents with focus on reaching minority and ethnic residents.
	Basis for Relative Priority	Priority based on feedback through community meetings and agency interviews as well review of demographic information for the City resulted in this activity having a high priority need.
6	Priority Need Name	Planning and Administration
	Priority Level	High
	Population	Extremely Low-Income Households Low-Income Households Moderate-Income Households
	Geographic Areas Affected	Citywide
	Associated Goals	Planning & Administration
	Description	Program Administration, Fair Housing, Oversight
	Basis for Relative Priority	Provides administration oversight of Consolidated Plan grant funded projects and ensures timely implementation in a manner that promotes compliance with established rules, policies, and guidelines.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The cost of housing is increasing at a faster rate than income, which contributes to unaffordable rent for people with low-income. Also, the demand for rental housing across all income levels limits the availability of housing at levels that is affordable for low-income families. Couple these issues with property owners seeking to recoup losses as a result of the COVID-19 pandemic by foregoing renters with subsidies for renters who can pay higher amounts and short-term rentals, which influences increased revenues. TBRA is an important tool for families to maintain affordable housing. Severe cost burden is the greatest predictor of homelessness risk, with populations paying more than 50% of their income towards housing costs or having incomes at or below 50% AMI at greatest risk of becoming homeless.
TBRA for Non-Homeless Special Needs	Lack of units with supportive services influences this program. Based upon consultations with homeless housing and social service agencies, a need for supportive housing has been identified as a priority. The special needs households include those with disabilities as well as dysfunctional households facing a variety of issues. Market characteristics impacting this priority relate to the shortage of privately-owned housing units which are available to provide supportive housing programs. This problem is intensified by the lack of public funds.
New Unit Production	The increasing demand for affordable housing, coupled with the increasing demand for market rate housing, places pressure on property owners to sell to purchasers that will develop higher end (through demolition/rehabilitation) rather than affordable units. This continues to put pressure on the two primary problems affecting the housing market, cost burden and overcrowding. Rents will not Financially Support the Cost of New Unit Production. A shortage of affordable, decent housing units is an identified need. The market characteristics influencing this priority include the age and condition of the existing housing stock without the rent levels to support rehabilitation. New construction faces the same market conditions. The HOME program can provide some resources to address this issue.
Rehabilitation	There is high demand in the rental market, which further drives up the cost burden for housing. The aging housing stock in the City make the rehabilitation of existing housing stock a priority. Rents will not financially support the cost of major rehabilitation projects similar to the new unit production priority discussed above, the achievable rents and income levels in the City often result in rehabilitation in the private marketplace to be financially infeasible.
Acquisition, including preservation	There are opportunities to improve the conditions and affordability of housing by the acquisition of vacant, deteriorating structures. These structures are for the most part multi-unit in nature or previously nonresidential buildings appropriate for conversion. The cost and complexity of acquisition and rehabilitation of these structures usually requires implementations by an experienced housing development entity and financial assistance. When structures are of historic or architectural value, the cost can be increased. Similar to the new unit production, the HOME program through the State can provide the resources for this type of development.

Table 47 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The City of Cleveland receives CDBG entitlement funding, and these funds are administered by the City of Cleveland's Administration Department for the City. The City of Cleveland was allocated \$360,241 in CDBG funds for the 2024 Fiscal Year.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$360,241	\$0.00	\$0.00	\$360,241	\$1,801,205	The primary objective of the CDBG program is to provide decent housing, a suitable living environment, and expanded economic opportunities principally for low- and moderate-income persons and neighborhoods. All prior year funds are currently committed to active projects.

Table 48 - Anticipated Resources

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 of Cleveland will use a combination of public and private funding to carry out activities identified in this plan. During this Consolidated Plan period, the City will research opportunities to apply for additional funding streams which are consistent with the goals of the Consolidated Plan. Cleveland will continue to leverage additional financial resources including state and local funds as well as investigate other sources of funding that are consistent with the goals of the 2024-2028 Consolidated Plan. The City will collaborate by working with community partners to encourage leveraging of available funding sources and strengthen capacity building.

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

The City will not use any publicly owned land to address the needs of this plan.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Cleveland	Government	Program Administration	Jurisdiction
Cleveland Housing Authority	PHA	Public Housing	Jurisdiction
Bradley Cleveland Community Services Agency - Cleveland Emergency Shelter	Nonprofit	Homeless Services	Jurisdiction
Habitat for Humanity of Cleveland	Nonprofit	Affordable Housing	Jurisdiction
Tennessee Housing Development Agency	Government	Homelessness	State
Tennessee Fair Housing Council	Nonprofit	Fair Housing	State
Family Promise of Bradley County	Nonprofit	Affordable Housing	Jurisdiction

**Table 49 - Institutional Delivery Structure
Assess of Strengths and Gaps in the Institutional Delivery System**

The City of Cleveland has a comprehensive network of service providers that is made up of nonprofits, community-based development organizations, local housing authorities, and coalitions. A common challenge in the Institutional Delivery System is the financial capacity of the nonprofit partners and lack of available resources to meet the needs. For many of the nonprofits the City’s funding represents the majority of the money expended for a program and limits the reach of the program beyond the amount allocated by HUD.

The primary gap in the delivery system remains private sector participation. A primary focus of the homeless task force’s Membership and Advocacy Working Group is addressing this issue.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance			
Rental Assistance	X	X	X
Utilities Assistance	X		X
Street Outreach Services			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X		
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X		
Mental Health Counseling	X	X	
Transportation	X		
Other			
Other			

Table 50 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The Bradley Cleveland Community Service Agency (BCCSA) uses outreach services as the primary tool to engage people who are chronically homeless and unaccompanied youth. BCCSA services we provide aims to eliminate poverty whenever possible. People who are chronically homeless are connected to permanent supportive housing; families with children to rapid re-housing; and unaccompanied youth to rapid re-housing and transitional housing. Outreach workers, assessment staff, and case managers all work with these populations to ensure that they are accessing mainstream services.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above.

The BCCSA offers services for securing and stabilizing housing are available to first time home buyers, homeless families and individuals, tenants and those families and individuals at-risk of homelessness as well as emergency services to provide short-term assistance to low-income households that have immediate needs with an essential item (shelter, utilities, water, clothing, food, transportation, etc.)

Service gaps exist in the homeless systems with local partner that may be uncoordinated leaving families to navigate different eligibility criteria and waitlists for shelter beds and housing programs. There are often various agencies carrying out assessment and referral efforts on behalf of the same individuals adding additional strain to the system and duplicating efforts. A standardized and uniform assessment will lend itself to a more transparent system that targets the housing and other services.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The City will continue to collaborate with service providers to identify gaps in services, any duplication of services, and attends regular meetings, which allow homeless service providers to serve the homeless population more efficiently. Additionally, providing a central intake and resource facility is an imperative part to the City's strategy to end homelessness. Efforts to bring other federal, state, local, and/or private funding for programs and activities that assist extremely low, very low, and low to moderate-income people have been paramount. In these difficult economic times, it is more important than ever for jurisdictions and agencies to manage federal monies wisely and ensure that each dollar dedicated to an activity is being leveraged, thereby maximizing results.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeownership Assistance	2024	2028	Affordable Housing	Citywide	Access to Affordable Housing	\$60,000	Direct Financial Assistance to Homebuyers Households Assisted
2	Affordable Housing Development	2024	2028	Affordable Housing	Citywide	Access to Affordable Housing	\$0	Homeowner Housing Added Households Assisted
3	Facility Improvements	2024	2028	Non-Housing Community Development	Citywide	Non-Housing Community Development	\$0	Public Facility other than housing benefit Persons Assisted
4	Infrastructure Improvements	2024	2028	Non-Housing Community Development	Citywide	Non-Housing Community Development	\$157,241	Infrastructure other than housing benefit Persons Assisted
5	Code Enforcement	2024	2028	Non-Housing Community Development	Citywide	Non-Housing Community Development	\$71,000	Housing Code Enforcement Households Assisted
6	Increase Access to Economic Development	2024	2028	Public Services	Citywide	Increase Access to Public Services	\$0	Businesses Assisted
7	Increase Access to Public Housing	2024	2028	Economic Development	Citywide	Increase Access to Economic Development	\$0	Persons Assisted
8	Administration	2024	2028	Administration	Citywide	Administration	\$72,000	Other

Table 51 – Goals Summary

Goal Descriptions

Goal Name	Goal Description
Homeownership Assistance	The city provides homeownership assistance for low income homebuyers.
Affordable Housing Development	The city provides forgivable loans for affordable housing acquisition in the CDBG target area.
Facility Improvements	The City will fund facility improvements such as recreational centers, parks, shelters, and community centers to provide a more suitable living environment through improved availability and accessibility.
Infrastructure Improvements	The City will fund infrastructure improvements such as sidewalks and road repairs to provide a more suitable living environment through improved availability and accessibility in the CDBG target area.
Code Enforcement	Code Enforcement Inspector is funded by the CDBG program to provide concentrated codes enforcement of the municipal codes within the designated CDBG target area and better educate property owners on their responsibilities for public safety.
Administration	Provide the administrative structure for the planning, implementation, and management of the CDBG grant program as well as other housing, community development, and homelessness programs.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City estimates that it will provide housing assistance to 20 homebuyers who meet the income thresholds over Consolidated Plan period.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The Cleveland Housing Authority is not under a Section 504 Voluntary Compliance Agreement.

Activities to Increase Resident Involvements

The Cleveland Housing Authority undertakes a variety of initiatives to increase resident involvement, including a comprehensive, updated website that provides information on all facets of the housing authority operations, policies and procedures. The Cleveland Housing Authority has established programs that represent all public housing residents living in the City.

The Cleveland Housing Authority requires all adult residents who are not exempt to:

- Contribute 8 hours per month of community service; or
- Participate in an economic self-sufficiency program (as defined in the regulations) for 8 hours per month; or
- Perform 8 hours per month of combined activities (community service and economic self-sufficiency programs).

Is the public housing agency designated as troubled under 24 CFR part 902?

According to HUD's Public Housing Agency Score (PHAS), the Cleveland Housing Authority, scoring a 60 is designated a standard performer and not considered by HUD to be troubled or poorly performing by HUD.

Plan to remove the 'troubled' designation

The Cleveland Housing Authority does not have a troubled designation.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The City of Cleveland is currently undertaking an Analysis of Impediments to Fair Housing Choice (AI) during this Consolidated Plan process that will identify any barriers that currently exist in the city for fair housing purposes and provide recommendations for any zoning changes that can remove any barriers to affordable housing. These barriers are addressed, within the City's limited ability to address them, through the housing activities listed in the City's Annual Action Plan and through the goals and policies listed for affordable housing.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Due to this ongoing analysis the following list of factors cannot be considered exhaustive but outlines some of the important obstacles to providing affordable housing in the city. It should be noted, non-governmental barriers, primarily market factors such as elevated land costs and construction costs, and high prevailing market prices for housing, have been the primary challenges facing jurisdictions in the region, including Cleveland, in recent years, not public policies. The City of Cleveland will continue to educate residents through first-time homebuyer workshops on identifying predatory lending practices and where to receive assistance if victimized by predatory lending practices. The City evaluates local zoning and subdivision regulations to help alleviate and address affordable housing barriers and attract new housing development. Other strategies include providing fair housing training at housing-related workshops, to City's governing body, and to all employees and supporting and funding pre- and post-purchase counseling, down payment, and closing cost assistance mechanisms for low-to-moderate income residents.

SP-60 Homelessness Strategy – 91.215(d)

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

The City of Cleveland relies on the CoC's Coordinated Entry System (CES) to assist people experiencing or at-risk of homelessness to readily find and navigate crisis intervention assistance. The CES is designed to ensure that households are prioritized and matched with the right intervention in a timely manner. It aims to standardize the access, assessment, and referral process across all providers in the community. Annually, the City of Cleveland is included in the Point in Time count for Bradley County that takes a count of homeless persons, particularly unsheltered homeless and assess their needs. All jurisdictions coordinate with the street outreach staff to locate, identify, engage, and enroll persons who sleep on the streets or in places not meant for human habitation. Persons with mental illness, substance abuse disorder, persons who are chronically homeless, families with children and unaccompanied youth are prioritized for service. Other efforts include placement in safe houses for homeless youth and a day shelter for homeless adults where staff can screen, assess, and engage persons to enroll them in housing and supportive services programs.

Addressing the emergency and transitional housing needs of homeless persons

At this time there are no transitional housing options available within the City, however, funds are allocated to the Cleveland Emergency Shelter to provide essential services and homelessness prevention when available. The City will continue to support organizations that address the emergency shelter and transitional housing needs of the homeless to establish a more robust social service system.

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 Cleveland will continue to support local organizations in reducing the amount of time that individuals and families (chronically homeless, families with children, veterans and their families, and unaccompanied youth) experience homelessness. The City and the providers of services and emergency housing for the homeless are more focused on meeting immediate shelter needs. The primary goals are to help people obtain permanent housing as quickly as possible, increase their self-sufficiency, and remain stably housed. The need to end the cycle of homelessness is recognized, but limited resources and capacity, and the relatively small number of persons experiencing homelessness, restrict what can be accomplished and result in a focus

more purely on daily health and safety issues. The Cleveland Emergency Shelter has a total of 50 beds and is actively pursuing funding for transitional shelter needs.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The Bradley Cleveland Community Services Agency applies to the State of Tennessee's competitive grant program. If funds are awarded, these funds support Cleveland Emergency Shelter for essential services and homelessness prevention. Homeless prevention funds go for security and utility deposits, and in some cases for arrearages. The main need is to link people with available housing opportunities as quickly as possible and support them in accessing subsidies and increasing their income to help them sustain their housing long-term.

During the next consolidated plan period, the City of Cleveland will continue to:

- Support organizations that provide transitional housing space for the homeless.
- Work with the local and state Department of Children Services and support them in their effort to expand services for youth existing foster care.
- Support case management, housing counseling, and job training for homeless, and those at risk of becoming homeless, individuals and families.
- Assist in the identification of available prevention programs and development of a gaps analysis that allows us to create a homeless prevention plan in the coming years.
- Support agencies that provide emergency food, rental assistance, utility assistance, and home repair that help prevent homelessness.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

According to the 2022 American Community Survey, 50.4% of Cleveland's housing units were built before 1978. To address lead-based paint hazards, the City adheres to the Residential Lead-Based Paint Hazard Reduction Act of 1992 in federally assisted housing. The City requires disclosure of known information on lead-based paint hazards before the sale or lease of housing built before 1978. The City also implemented city codes and regulations to protect its citizens from lead-based paint hazards, which is integrated through purchasing policies and code enforcement.

How are the actions listed above related to the extent of lead poisoning and hazards?

All services are offered to residents regardless of the extent of the lead poisoning and hazards. The Tennessee Department of Public Health issues lead hazard control orders which are strictly enforced. Due to the age of a significant number of the housing in the City; there is a need to address Lead Based Paint (LBP) hazards more than available resources.

The national leading cause of lead-based poisoning is exposure to dust from deteriorating paint in homes constructed before 1978. According to the Tennessee Department of Public Health, the Federal Law (Title X, Section 1018) requires landlords, sellers, and renovators to give information on lead-based paint and lead based paint hazards before the sale or lease of target housing. Target housing includes most private housing, public housing, housing receiving federal assistance and federally owned housing built before 1978.

Pre-1978 housing occupied by lower income households with children offers particularly high risks of lead exposure due to the generally lower levels of home maintenance. This is an important factor since it is not the lead itself that causes health hazards, but instead the deterioration of the paint that releases lead-contaminated dust and allows children to peel and eat lead-contaminated flakes.

The high-risk factors for lead poisoning include:

- Living in a home built before 1950
- Living in a recently remodeled home originally built before 1978

How are the actions listed above integrated into housing policies and procedures?

The City incorporate Lead-based paint procedures in its local policies and procedures. While the city is not a participating jurisdiction for HOME funding or other types of funding for the

construction or rehabilitation of housing, the city will with its code enforcement efforts continue address lead based paint education and public awareness. Additionally, information is provided by the city for property owners, landlords, and tenants regarding lead based paint awareness and education.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Providing supportive services to LMI families is a primary goal for the City of Cleveland. The City undertakes activities related to reducing poverty with its continued support of organizations serving low and moderate income families, which includes those below the poverty level, working with Habitat for Humanity and City Fields CDC to increase the affordable housing stock in the City. The City will also continue to provide down payment assistance homebuyers. In addition, to these specific activities, the City will continue to participate in the coordination of social services, job training and housing programs through the Continuum of Care.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Education and employment are key factors in breaking the cycle of poverty. To that end, the City is committed to funding programs over the five years that will promote literacy, financial literacy and self-sufficiency and help prepare residents for employment opportunities.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Activities will be administered and monitored by the CDBG Manager in the City Administrative Services Department. Many of the activities outlined in this plan will not require subrecipients or contractors and will be carried out by the city departments. The City will conduct internal and external monitoring at least once during the program year. This process will include either a desk audit or on-site field visits with an exit conference. Additional visits are scheduled as needed.

Expected Resources

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

Introduction

The City of Cleveland uses multiple resources to carry out activities that benefit low and moderate-income persons. Cleveland receives CDBG entitlement funding. The Development and Engineering Services Department administers the funding on behalf of the City. The City of Cleveland was allocated \$360,241 in CDBG funds for the 2024 Fiscal Year. The City does not anticipate receiving any program income.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan	Narrative Description
			Annual Allocation:	Program Income:	Prior Year Resources:	Total:		
CDBG	Public - Federal	Admin and Planning Housing Public Improvements Public Services	\$360,241	\$0	\$0	\$360,241	\$1,801,205	The primary objective of the CDBG program is to provide decent housing, a suitable living environment, and expanded economic opportunities principally for low- and moderate-income persons and neighborhoods. All prior year funds are currently committed to active projects.

Table 52 - 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 of Cleveland will use a combination of public and private funding to carry out activities identified in this plan. During this Consolidated Plan period, the City will research opportunities to apply for additional funding streams which are consistent with the goals of the Consolidated Plan. Cleveland will continue to leverage additional financial resources including state and local funds as well as investigate other sources of funding that are consistent with the goals of the 2024-2028 Consolidated Plan. The City will collaborate by working with community partners to encourage leveraging of available funding sources and strengthen capacity building.

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

The City will not use any publicly owned land to address the needs of this plan.

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	Homeownership Assistance	2024	2025	Affordable Housing	Citywide	Access to Affordable Housing	\$60,000	Direct Financial Assistance to Homebuyers Households Assisted
2	Affordable Housing Development	2024	2025	Affordable Housing	Citywide	Access to Affordable Housing	\$0	Homeowner Housing Added Households Assisted
3	Facility Improvements	2024	2025	Non-Housing Community Development	Citywide	Non-Housing Community Development	\$0	Public Facility other than housing benefit Persons Assisted
4	Infrastructure Improvements	2024	2025	Non-Housing Community Development	Citywide	Non-Housing Community Development	\$157,241	Infrastructure other than housing benefit Persons Assisted
5	Code Enforcement	2024	2025	Non-Housing Community Development	Citywide	Access to Affordable Housing	\$71,000	Housing Code Enforcement Households Assisted
6	Administration	2024	2025	Administration	Citywide	Administration	\$72,000	Other

Table 53 – Goals Summary

Goal Descriptions

Goal Name	Goal Description
Homeownership Assistance	The city provides homeownership assistance for low income homebuyers.
Affordable Housing Development	The city provides forgivable loans for affordable housing acquisition.
Facility Improvements	The City will fund facility improvements such as recreational centers, parks, shelters, and community centers to provide a more suitable living environment through improved availability and accessibility.
Infrastructure Improvements	The City will fund infrastructure improvements such as sidewalks and road repairs to provide a more suitable living environment through improved availability and accessibility.
Code Enforcement	Code Enforcement Inspector is funded by the CDBG program to provide concentrated codes enforcement of the municipal codes within the designated CDBG target area and better educate property owners on their responsibilities for public safety.
Administration	Provide the administrative structure for the planning, implementation, and management of the CDBG grant program as well as other housing, community development, and homelessness programs.

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects planned for the 2024-2025 program year are identified in the table below, with additional detail provided in AP-38. Over the next year, the City of Cleveland anticipates assisting low- and moderate- income persons by performing the activities outlined below.

Projects

#	Project Name
1	Down Payment Assistance
2	Code Enforcement
3	Infrastructure
4	Administration & Planning

Table 54 – Project Information

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

The projects were selected to meet identified needs in the community with the resources provided. Limited financial resources are the greatest obstacle to meeting the City’s underserved needs. Cleveland will continue to estimate allocations for this Consolidated Plan period based on the final allocation amount and the priorities identified in the PY2024-2028 Consolidated Plan, community input, qualified requests for funding, and Development and Engineering Services Department, and City Council. The City recognizes there are multiple needs for low and moderate-income persons in the City that are met through the use of CDBG funds. These needs include access to affordable housing for low and moderate-income persons, services for homeless and at-risk populations, increased capacity for public services and addressing community development needs. The City prioritizes grant allocations by ensuring that all proposed projects will:

- Directly benefit low and moderate-income persons or households as defined by HUD’s Income Limit Guidelines based on the Cleveland Metropolitan Statistical Area (MSA); or
- Take place in an area where more than 51% of the population is lower income according to HUD Income Limits.

AP-38 Project Summary

Project Summary Information

1	Project Name	Homebuyer Assistance
	Target Area	Citywide
	Goals Supported	Homeownership Assistance
	Needs Addressed	Access to Affordable Housing
	Funding	\$60,000
	Description	Down Payment Assistance will be provided to eligible first time home buyers through City Fields and Habitat for Humanity
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Down Payment Assistance will be provided to 5 qualified first-time home buyers through City Fields and Cleveland Habitat for Humanity.
	Location Description	Citywide
	Planned Activities	Down Payment Assistance
2	Project Name	Code Enforcement
	Target Area	CDBG Target Area
	Goals Supported	Code Enforcement
	Needs Addressed	Access to Affordable Housing
	Funding	\$71,000
	Description	Provides funds for an employee and program cost associated with a codes enforcement inspector to provide enforcement of municipal codes in the City.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	200
	Location Description	Citywide
	Planned Activities	Provide Code Enforcement Inspector and cost associated with a program to focus efforts in the City and to provide education to target residents on codes.
3	Project Name	Public Infrastructure Improvements
	Target Area	CDBG Target Area

	Goals Supported	Infrastructure Improvements
	Needs Addressed	Non-Housing Community Development
	Funding	\$157,241
	Description	To complete infrastructure repairs and improvements in the low-income areas.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	500
	Location Description	Low Income Census Tract
	Planned Activities	To Be Determined
4	Project Name	Administration
	Target Area	Citywide
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	\$72,000
	Description	Provide the administrative structure for the planning, implementation, and management of the CDBG grant program as well as other housing, community development, and homelessness programs.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Citywide
	Planned Activities	Provide the administrative structure for the planning, implementation, and management of the CDBG grant program as well as other housing, community development, and homelessness programs.

Rationale for the priorities for allocating investments geographically

To generate the greatest impacts, the City will focus efforts citywide in low-income areas. The general priorities and needs are, public services, affordable housing and public facilities & infrastructure that meet the needs of the City's very low-, low- and moderate-income residents.

Federal CDBG funds are intended to provide low and moderate income (LMI) households with viable communities, including decent housing, a suitable living environment and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration. The system for establishing the priority for the selection of these projects is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG program
- Meeting the needs of LMI residents
- Focusing on LMI areas or neighborhoods
- Coordination and leveraging of resources
- Response to expressed needs
- Sustainability and/or long-term impact
- The ability to demonstrate measurable progress and success

Public facility and infrastructure activities will be provided for areas where the percentage of LMI persons is 51% or higher. CDBG will also be used for beneficiaries that meet criteria under limited clientele beneficiary, such as the elderly, persons with disabilities, the homeless, etc. It is also expected that funding will be provided to assist low- and moderate- income homeowners. Public facilities and infrastructure activities will be based in the qualified census tracts according to the quartile method.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Cleveland’s CDBG program supports affordable housing opportunities. With few exceptions, the CDBG regulations do not allow funds to be used for the construction of housing. However, what is permitted and what had been an effective strategy for the City’s CDBG investments is supporting other partner agencies such as Habitat for Humanity and City Fields that do new construction, either through allowable activities such as land acquisition, infrastructure, and site development, and by providing financial assistance for low to moderate income homebuyers. These activities will be strategically pursued throughout the Annual Action Plan and Consolidated Plan planning periods.

The city actively supports area public and private housing and social service agencies that aid residents. Cleveland and Bradley County are fortunate to have many agencies which are instrumental in meeting the various needs of lower income residents. The City works directly with Habitat for Humanity, an affordable housing provider; and City Fields, a Community Development Corporation serving the CDBG target area; the Cleveland Housing Authority and Cleveland Emergency Shelter on the public housing and homeless fronts. The City of Cleveland provides code enforcement measures, foreclosed property care, & public awareness of Fair Housing to households. Financial and educational assistance is also provided by the City through its various social partners.

The City plans to continue the partnership with City Fields to complete portions of the master plan. In 2018, they became a 501c3 designated Community Development Corporation (CDC) to help the City more aggressively address affordable housing by developing quality affordable housing and social and economic development issues that exist in certain parts of Cleveland. To achieve this goal, City Fields has partnered with the CDBG office to assist with down payment assistance. As a CDC, City Fields can develop affordable housing to grow homeownership in their target area. Purchasing homes to renovate and sell them to future homeowners can also aid in preventing rapid gentrification. Additionally, this designation allows them to work with local banks, offering financial services that will benefit the neighborhood.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	10
Special-Needs	0
Total	10

Table 56 - 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	0
Rehab of Existing Units	0
Acquisition of Existing Units	10
Total	10

Table 57 - One Year Goals for Affordable Housing by Support Type

Discussion

City of Cleveland will continue the partnerships with City Fields and Habitat for Humanity in the efforts of affordable housing.

AP-60 Public Housing – 91.220(h)

Introduction

The Cleveland Housing Authority has been serving Cleveland and Bradley County since 1959 through the provision of affordable housing rental assistance programs to income eligible citizens. CHA currently operates a Project Based Rental Assistance (PBRA) program of 293 units, and a Public Housing (PIH) program of 114 units. All CHA properties are disbursed over fourteen (14) scattered sites in southeast Cleveland. Additionally, CHA also operates a Housing Choice Voucher (HCV) program serving up to 208 families and a Veterans Affairs Supportive Housing (VASH) program serving up to 15 veteran families.

As of April 1, 2023, a total of 133 families resided in PBRA program units and 104 families resided in PIH program units. Note: Many of the PBRA program units are undergoing substantial rehab and are unable to be occupied as of the date of this report. 167 families were being served in the Housing Choice Voucher program and 11 veteran families are served in the VASH program. CHA administers approximately \$3.2 million dollars of combined rental assistance to the Cleveland and Bradley County community. Currently, CHA is in the midst of a major renovation project within the PBRA program. As a result, the Housing Authority suspended much of its PBRA leasing activity due to renovation activity. As a result, the Public Housing waiting list is closed. Currently, the PIH waiting list contains 319 applicants among all bedroom sizes (1, 2, 3, 4, and 5). The Housing Choice Voucher waiting list contains 54 applicants and remains closed as of the date of this report. The average income of residents in all programs remains at or below 30% of AMI. CHA financial support is derived from HUD in the form of PIH Operating Subsidy, PBRA Housing Assistance Payments, and Section 8 Housing Assistance funding.

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

CHA is pursuing a conversion of its Public Housing Program to HUD's Multi-Family Program through HUD's Rental Assistance Demonstration (RAD). CHA closed on the first phase of its conversion on August 30, 2022, and a Notice to Proceed was issued to commence rehabilitation activity on vacant PBRA units. The rehabilitation project is estimated for completion in September 2024. The conversion presents an opportunity for CHA to solidify its financial base using the Section 8 funding stream and exit the Public Housing Operating Subsidy funding system. The conversion also presents an opportunity for CHA to become the owner of the portfolio and thus utilize available financing methods to leverage additional capital for modernization and/or new construction of its affordable housing stock.

CHA intends to complete the conversion of the remaining 114 PIH units in multiple phases and will utilize a variety of methods available thru RAD. Specifically, CHA will execute a gut-rehab modernization of three hundred six (306) units of the four hundred twenty (420) units. Additional phases may include the disposition (sale) of select properties to CHA's non-profit instrumentality, Tanasi Housing Development Corporation to enhance the affordability of those units. Tanasi will

function as CHA's development arm for all future affordable housing production as well as other development opportunities. Lastly, CHA may utilize HUD's Streamlined Voluntary Conversion (SVC) for any remaining Public Housing Program units to complete the conversion. The conversion will position CHA's affordable housing portfolio for financial sustainability through HUD's Multi-Family program. All conversion activities/methodologies will result in units remaining affordable and continue to serve existing and future program participants with affordable housing for low-income clients.

CHA is positioned as a Redevelopment Authority for the City of Cleveland and can work in collaboration.

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

The Cleveland Housing Authority Board is comprised of seven members, including one resident. Appointments to the board are made by the Mayor of Cleveland. The Cleveland Housing Authority strongly encourages the involvement of its residents in providing input into its management policies and operating procedures. CHA's Resident Association holds periodic meetings to provide a forum for input, coordination between resident and CHA staff regarding /policy changes as well as current and future modernization activities.

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

NA

Discussion

City of Cleveland is partnering with Cleveland Housing Authority for future activities. Those activities are currently in the pre-planning stage.

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

Introduction

This section describes the one-year goals and activities for the City of Cleveland in assessing and serving the needs for homeless persons and special needs populations. There is no transitional housing or permanent supportive housing in Cleveland, although the agencies mentioned provide wrap around type services, including life training, employment training, and other programming. Over the years, the City of Cleveland has strategically partnered with social service organizations to achieve its Consolidated Plan goal of eliminating homelessness. Cleveland has one primary facility for housing homeless persons, Cleveland Emergency Shelter, operated by the Bradley/Cleveland Community Services Agency. The Cleveland Emergency Shelter is also a Harbor Safe House that can accommodate between 10 to 12 families who are victims of domestic violence.

The City's homeless strategy collaboratively addresses the essential needs for homeless and other special needs populations. The goal is to invest in activities that lead people experiencing homelessness to permanent housing as quickly as possible while offering a variety of intervention options that provide options to address the different needs. Such interventions include rapid rehousing, permanent supportive housing, immediate access to low-barrier emergency shelter; intensive service-focused recovery housing programs; transitional housing options for special needs populations (especially households fleeing domestic violence, youth and youth adults, and people with substance use issues); diversion programs. Life Bridges provides services for mentally handicapped individuals to become more self-sufficient; to train them to perform everyday tasks and helps them to gain employment in the community.

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

Outreach to homeless individuals is primarily done through case managers and staff at area shelters and health care facilities. During the next year, the City of Cleveland will continue to embark on unified outreach missions in collaboration with other City departments to ensure persons experiencing homelessness or may need assistance are provided essential resources. These agencies are the key service providers for homeless needs and manage their programs to keep services in line with their assessment of needs and discussions with clients.

Addressing the emergency shelter and transitional housing needs of homeless persons

At this time there are no transitional housing options available within the City, however, funds are allocated to the Cleveland Emergency Shelter to provide essential services and homelessness prevention when available. The City will continue to support organizations that address the emergency shelter and transitional housing needs of the homeless to establish a more robust

social service system.

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 Cleveland will continue to support local organizations in reducing the amount of time that individuals and families (chronically homeless, families with children, veterans and their families, and unaccompanied youth) experience homelessness. The City and the providers of services and emergency housing for the homeless are more focused on meeting immediate shelter needs. The primary goals are to help people obtain permanent housing as quickly as possible, increase their self-sufficiency, and remain stably housed. The need to end the cycle of homelessness is recognized, but limited resources and capacity, and the relatively small number of persons experiencing homelessness, restrict what can be accomplished and result in a focus more purely on daily health and safety issues. The Cleveland Emergency Shelter has a total of 50 beds and is actively pursuing funding for transitional shelter needs.

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 City of Cleveland receives funding through the State of Tennessee Small Cities Emergency Shelter Grant program. These funds are sub-granted to the Cleveland Emergency Shelter for essential services and homelessness prevention. Homeless prevention funds go for security and utility deposits, and in some cases for arrearages. The main need is to link people with available housing opportunities as quickly as possible and support them in accessing subsidies and increasing their income to help them sustain their housing long-term.

Discussion

During the next consolidated plan period, the City of Cleveland will continue to:

- Support organizations that provide transitional housing space for the homeless.
- Work with the local and state Department of Children Services and support them in their effort to expand services for youth existing foster care.
- Support case management, housing counseling, and job training for homeless, and those at risk of becoming homeless, individuals and families.

- Assist in the identification of available prevention programs and development of a gaps analysis that allows us to create a homeless prevention plan in the coming years.
- Support agencies that provide emergency food, rental assistance, utility assistance, and home repair that help prevent homelessness.

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

Introduction:

The City's homeless strategy collaboratively addresses the essential needs of homeless and other special needs populations. Providing education and training to the public on the importance of affordable housing opportunities throughout the city is a top priority. The goal is to invest in activities that lead people experiencing homelessness to permanent housing as quickly as possible while offering a variety of intervention options that provide options to address the different needs. Professionals in the community understand the needs and convene regularly to discuss how to make sure there are a range of housing types and incomes throughout all parts of the city. Leveraging funding opportunities used by nonprofit developers could be matched with other public- private partnerships made available to the city.

The City collaborates with the local providers to strengthen the homeless governance structure and ensure services are provided to these populations. Such interventions include rapid rehousing, permanent supportive housing, immediate access to low-barrier emergency shelter; intensive service-focused recovery housing programs; transitional housing options for special needs populations (especially households fleeing domestic violence, youth and youth adults, and people with substance use issues); diversion programs.

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

The City of Cleveland continues to make improvements to the Zoning Ordinance to promote affordable housing and has amended the Zoning Ordinance on Accessory Dwelling Units to include "detached accessory dwelling" which provides a secondary dwelling within an existing single-family home. Other benefits of allowing detached accessory dwellings include the on-site presence of landlords which creates accountability for those living in the accessory units. The City will continue and expand efforts to:

- To educate and disseminate information regarding fair housing laws and complaint procedures by working with public and private sector partners
- Work with non-profit and for-profit developers to discuss and strategy for creating housing opportunities across the city
- Maintain resources for translation services to disseminate information
- Aid with the formation of neighborhood groups
- Provide fair housing information to landlords and tenants
- Provide down payment and closing cost assistance

AP-85 Other Actions – 91.220(k)

Introduction:

The Strategic Plan addresses the issue of meeting underserved needs through a variety of initiatives. Several of these initiatives are proposed for funding in this Annual Plan. The CDBG staff will host various workshops for subrecipients to provide an overview of program guidelines and expectations. We will utilize these workshops as an opportunity to network, share successes and lessons learned, and to discuss best practices for utilizing HUD funding. Technical Assistance will also be provided to subrecipients as needed.

Actions planned to address obstacles to meeting underserved needs

The City will collaborate with community leaders, stakeholders, and local non-profit agencies to help remove obstacles to better meet the needs of the underserved population and improve service delivery. The City will coordinate the work of nonprofit agencies to provide social services, disseminate news and information, and spearhead community-wide solutions to local needs. Program staff will also ensure that all fair housing education materials are current and compliant with the Affirmatively Furthering Fair Housing Final Rule.

Actions planned to foster and maintain affordable housing

In the interest of preserving affordable housing, the City will continue to support the use of CDBG program funds for activities such as down-payment assistance to ensure low income households have an opportunity for affordable housing. The City will also promote fair housing choice and encourage support fair housing rights for all and provide program funds to conduct outreach and education regarding the Fair Housing Law act of 1968.

Actions planned to reduce lead-based paint hazards

To address lead-based paint hazards the City adheres to the Residential Lead-Based Paint Hazard Reduction Act of 1992 in federally assisted housing. The City requires disclosure of known information on lead-based paint hazards before the sale or lease of housing built before 1978. The City also implemented city codes and regulations to protect its citizens from lead-based paint hazards which is integrated through purchasing policies and code enforcement.

Actions planned to reduce the number of poverty-level families

The City will utilize its CDBG funds to reduce the number of poverty-level families. This structure ensures continuity and that poverty-reducing activities implemented under CDBG are provided in conjunction with housing related efforts and decisions. Ongoing communication between the City and non-housing and housing service providers will support such efforts.

Actions planned to develop institutional structure

The City recognizes the need to maintain a high level of coordination on projects involving other City departments and/or non-profit organizations. This collaboration guarantees an efficient use of resources with maximum output in the form of accomplishments.

The City will address gaps and improve institutional structure by using the following strategies:

- Reduce and/or alleviate any gaps in services and expedite the delivery of housing and community development improvements to eligible persons.
- Evaluate the procurement process and guidelines for all rehabilitation and construction projects.
- Coordinate projects among City departments and support ongoing efforts for City initiatives.
- Maintain a strong working relationship with the based on the mutually shared goal of providing suitable housing for low- and extremely low-income persons.
- Work with and financially support local nonprofits operating in low- and moderate-income neighborhoods to build affordable housing for the elderly, veterans and other special needs populations.

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

The City will continue to work with a broad cross-section of public, private, faith-based, and community organizations to identify the needs of its citizens. By continuing to collaborate with the CoC and the community, the City will continue to streamline the actions of public service agencies to improve the lives of all persons in the City of Cleveland.

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(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
Total Program Income	0

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.	80%

Appendix - Alternate/Local Data Sources

1	<p>Data Source Name</p> <p>Consolidated Plan Survey</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>The City of Cleveland provided a survey for citizen participation.</p>
	<p>Provide a brief summary of the data set.</p> <p>The survey provided relevant information about public awareness of community development and affordable housing needs. It also provided a gauge of public awareness related to affordable housing choice and fair housing.</p>
	<p>What was the purpose for developing this data set?</p> <p>The purpose of developing this data set was for citizen participation, input, and feedback.</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>The year the data was collected in 2024 during the Consolidated Planning period between January and March.</p>
	<p>Briefly describe the methodology for the data collection.</p> <p>Surveys were disseminated to city departments, partners, and agencies. It was also available in English and Spanish on the website. The survey was also disseminated to citizens at meetings and available at community service organizations.</p>
	<p>Describe the total population from which the sample was taken.</p> <p>The sample was available for the total population of residents in Cleveland.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>The demographics of the respondents were not observed. The survey was purely for public input. Approximately 67 surveys were submitted, reviewed, and comments are listed in the appendix.</p>