



**COUNTY OF SUMMIT  
 NEIGHBORHOOD STABILIZATION PROGRAM  
 AMENDMENT TO 2008 ANNUAL ACTION PLAN  
 COMMUNITY DEVELOPMENT  
 BLOCK GRANT ACTION PLAN**

The Neighborhood Stabilization Program was authorized under Title III Division B of the Housing and Economic Recovery Act of 2008 (HERA) which was authorized on July 30, 2008. This special allocation of Community Development Block Grant Funds is to be used to address the critical problem of foreclosed, abandoned and vacant properties. Neighborhood Stabilization Program resources are being made available by the U.S. Department of Housing and Urban Development (HUD) on a formula basis to cities, counties and states. HUD has allocated \$3,767,144 directly to the County of Summit. The following 2008 Annual Action Plan Amendment is the basis for the County of Summit Neighborhood Stabilization Plan.

Activity	NSP Allocation
Non-Profit Purchase/New Construction	\$500,000
Non-Profit Purchase/Rehab/Re-Sell	782,500
Non-Profit/Bank Partnership for Lease Purchase	700,000
Land Banking	589,930
Local Community Agreements	800,000
Administration and Planning	374,714
	\$3,767,144

# **NSP GRANT SUBMISSION TEMPLATE**

## **& CHECKLIST**

(UPDATED 10.21.08)

NSP grant allocations can be requested by submitting a paper NSP Substantial Amendment or a form under the Disaster Recovery Grant Reporting (DRGR) system. This template sets forth the suggested format for grantees under the NSP Program. A complete submission contains the information requested below, including:

- (1) The NSP Substantial Amendment (attached below)
- (2) Signed and Dated Certifications (attached below)
- (3) Signed and Dated [SF-424](#).

Grantees should also attach a completed NSP Substantial Amendment Checklist to ensure completeness and efficiency of review (attached below).

# THE NSP SUBSTANTIAL AMENDMENT

Jurisdiction(s): <a href="#">County of Summit</a> <a href="#">Russell M. Pry, Executive</a> <a href="#">Connie Krauss, Director of Community and Economic Development</a> Jurisdiction Web Address: <a href="http://www.co.summit.oh.us/executive/dev.htm">http://www.co.summit.oh.us/executive/dev.htm</a>	NSP Contact Person: <a href="#">Elizabeth A. Rogers</a> Address: <a href="#">175 S. Main Street</a> <a href="#">Suite 207</a> <a href="#">Akron, Ohio 44308</a> Telephone: <a href="#">330-643-8623</a> Fax: <a href="#">330-643-2886</a> Email: <a href="mailto:erogers@summitoh.net">erogers@summitoh.net</a>
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**A. AREAS OF GREATEST NEED**

Provide summary needs data identifying the geographic areas of greatest need in the grantee’s jurisdiction.

Response:

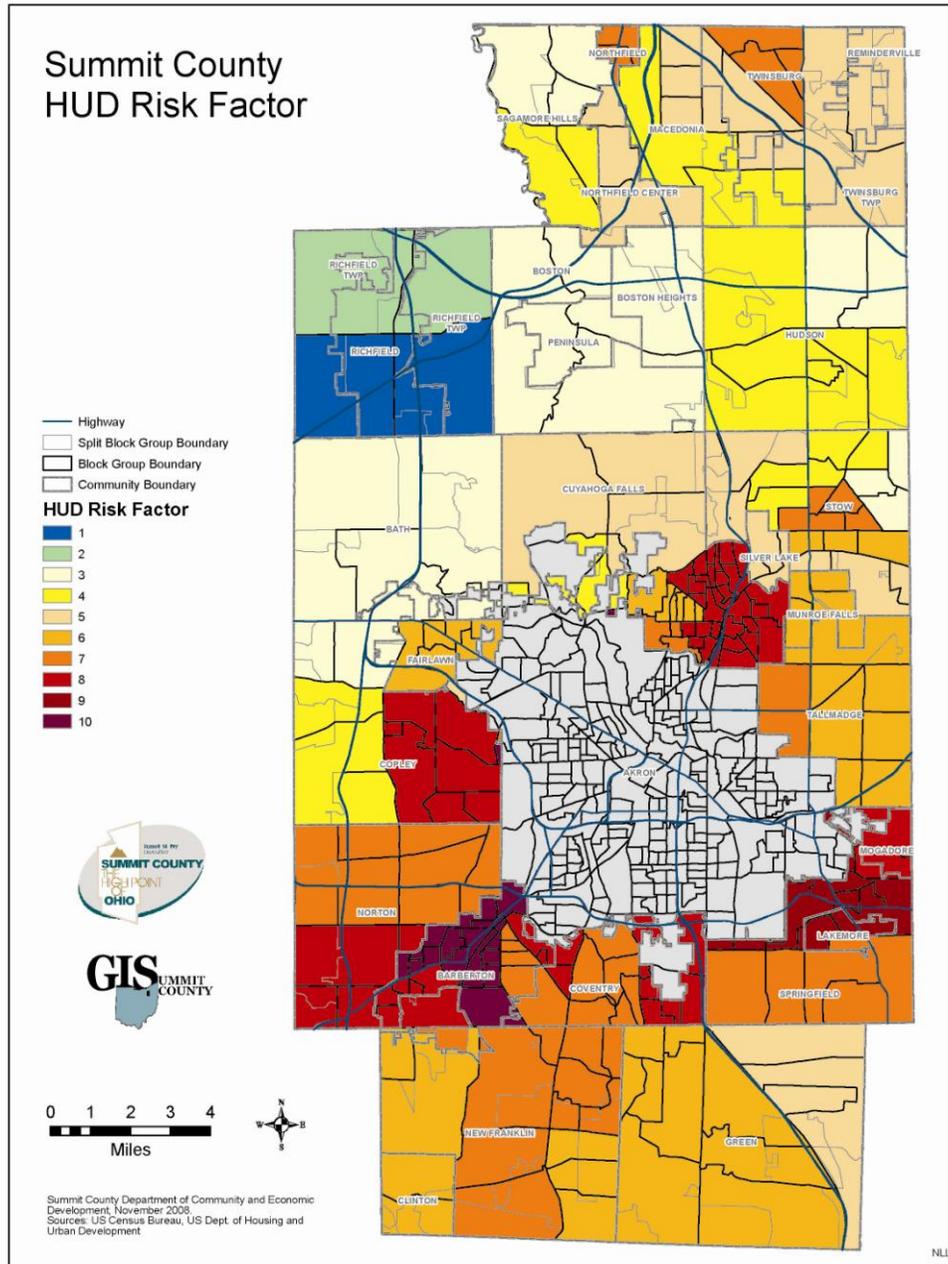
The County of Summit is located in Northeastern Ohio, a region that has been hard hit by the sub-prime loan and foreclosure crisis. The County is home to thirty-one (31) communities and is comprised according to the 2000 census, of 542,999 people. The communities with the exception of the City of Akron are eligible to request Neighborhood Stabilization Funding from the Summit County allocation of \$3,767,144.

All of the communities in the county have experienced a negative impact from the foreclosure crisis and have a need for reinvestment in areas which have a concentration of foreclosed and abandoned properties. However, there are communities in the County of Summit that suffered more disinvestment than others. The County of Summit will focus the Neighborhood Stabilization Program funds in those areas that have experienced a higher rate of foreclosure and a higher rate of sub-prime lending. Without immediate reinvestment these areas have a higher risk of experiencing an increase in foreclosure.

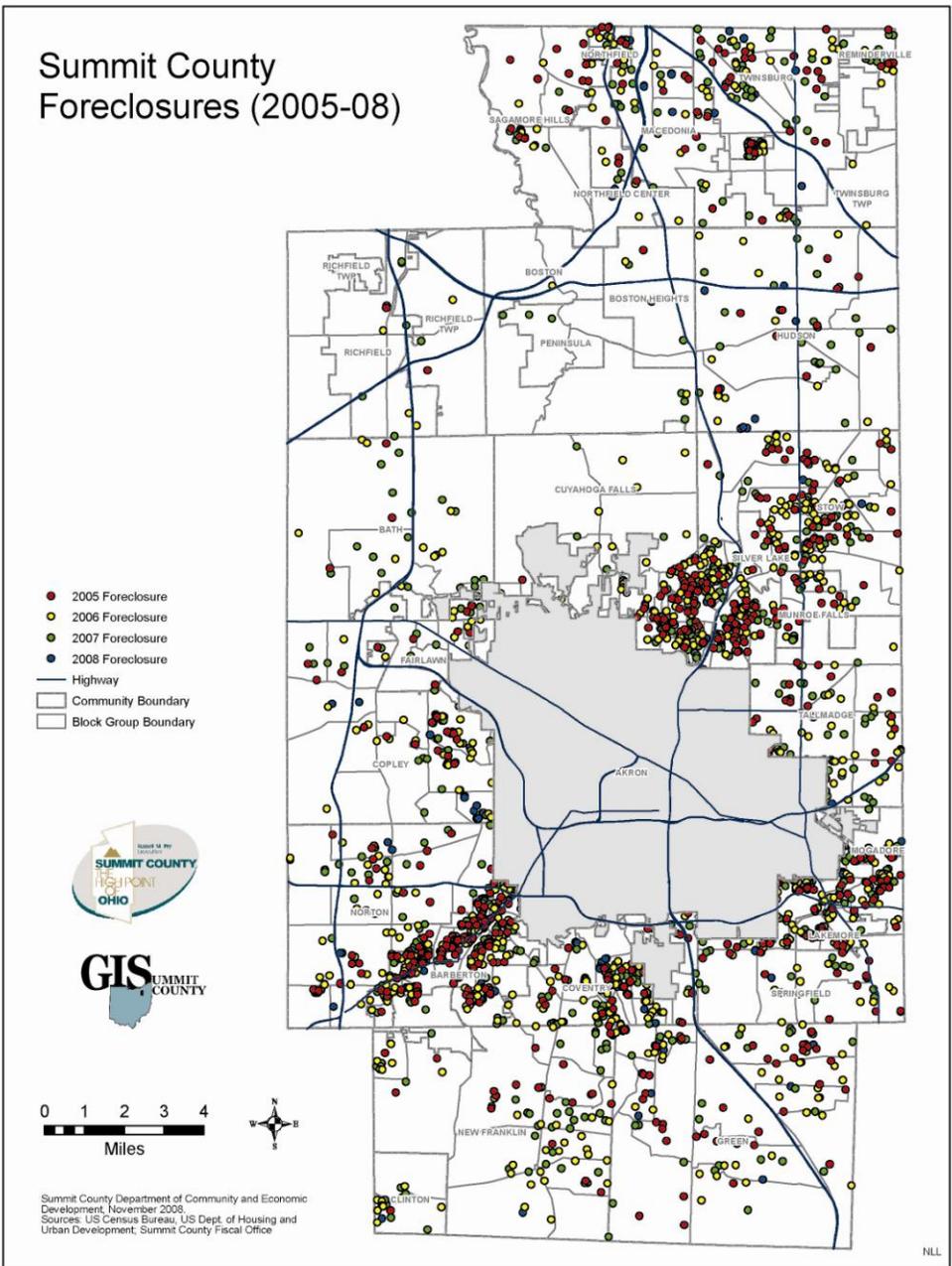
In our efforts to identify the areas of greatest need, we reviewed the HUD Risk Factor (Figure 1). From this starting point, the Summit County Community Development Department worked closely with the Planning Department, the Clerk of Courts, the Consumer Affairs Office and the Fiscal Office to gather foreclosure information (Figure 2) for the years 2005 to 2008 and information on the incidence of subprime lenders foreclosing in the county. The result is a ranking system that includes the foreclosure and abandonment risk score as provided by HUD, actual foreclosed property information as a percentage of housing units and the determination of a low-mod census block groups. The factors were equally weighted and used to determine the areas of greatest need. The combination of these data sources has allowed us to determine the areas of greatest need based on the degree that foreclosure has impacted the immediate area.

All census block groups in the county (excluding the City of Akron as a NSP grant recipient) have been evaluated and ranked according to the above criteria. Based on our current level of funding, the County of Summit Neighborhood Stabilization

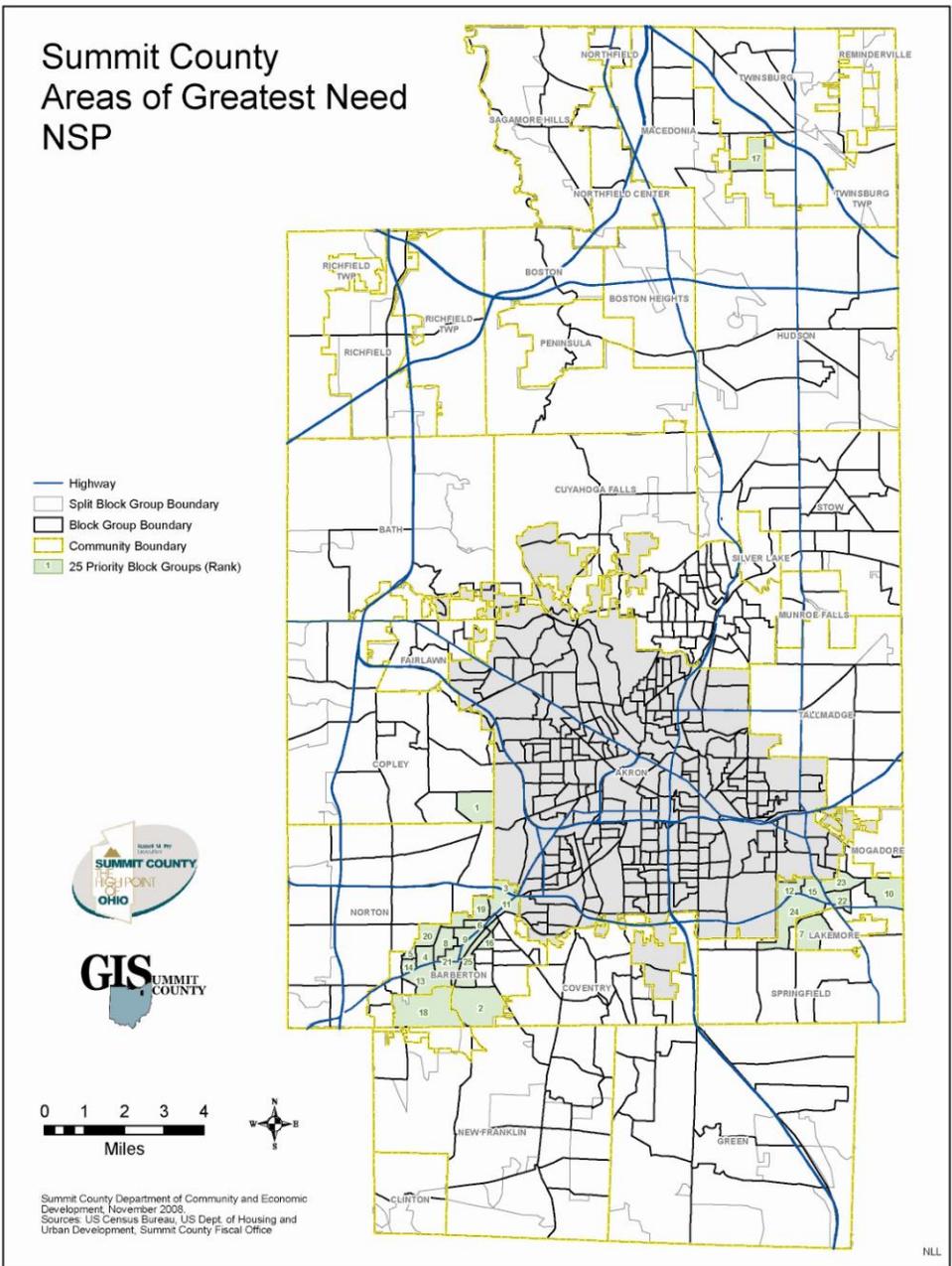
Program will focus on the top twenty-five (25) ranked split block group level. The twenty-five (25) block groups designated as areas of greatest need are located in the communities of Copley Township (1), the City of Barberton (15), the Village of Lakemore (1), Springfield Township (6), Twinsburg Township (1), and the City of Norton (1). These block groups representing the areas of greatest need are identified in rank order on the following map. (Figure 3)



**Figure 1**



**Figure 2**



**Figure 3**

## ***B. DISTRIBUTION AND USES OF FUNDS***

Provide a narrative describing how the distribution and uses of the grantee's NSP funds will meet the requirements of Section 2301(c) (2) of HERA that funds be distributed to the areas of greatest need, including those with the greatest percentage of home foreclosures, with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures. *Note:* The grantee's narrative must address these three stipulated need categories in the NSP statute, but the grantee may also consider other need categories.

### Response:

The new allocation of Neighborhood Stabilization Program (NSP) funds from HUD and the State of Ohio will not address every NSP qualified property located in Summit County (outside the City of Akron). Therefore, the distribution of funds will be focused on the twenty-five block groups identified as the areas of greatest need. NSP qualified projects located in these areas will be funded as a priority.

All NSP funds will be used to benefit persons at or below 120% of area median income by the following activities, Non-Profit Purchase/New Construction, Non-Profit Purchase/ Rehab/Re-sell, Non-Profit/Bank Partnership for Lease Purchase, Land Banking and Local Community Agreements.

The Lease Purchase component is an effective way of providing assistance and addressing the subprime mortgage financing concern. The buyer will have an opportunity to lease a newly rehabilitated home, re-establish credit and within 36 months purchase the home from a traditional lender. NSP funds will be used to assure affordability for the lease purchase option by providing the income qualified individual with an alternative financing option.

Subprime lending and subsequent foreclosure have been a significant factor in all of the twenty-five block groups identified as areas of greatest need.

The block groups designated as areas of greatest need have already experienced an unprecedented increase in the rate of home foreclosure during the last three years. By strategically targeting funding to these already impacted areas the Neighborhood Stabilization Program will mitigate the existing damage and prevent future increases in the foreclosure rate.

The County of Summit will work with non-profits, other governmental agencies, local and national lending institutions and the private sector to leverage NSP Funds.

The funds will be used for these primary activities:

Non-Profit Purchase/New Construction	\$500,000
Non-Profit Purchase/Rehab/Re-sell	782,500
Non-Profit/Bank Partnership for Lease Purchase	700,000
Land Banking	589,930
Local Community Agreements	800,000
Administration/Planning	374,714

**C. DEFINITIONS AND DESCRIPTIONS**

(1) Definition of “blighted structure” in context of state or local law.

Response:

The County of Summit has determined a “blighted parcel” to mean either of the following as under the Ohio Revised Code Section 1.08:

- B. “**Blighted** parcel” means either of the following:
1. A parcel that has one or more of the following conditions:
    - a. A structure that is dilapidated, unsanitary, unsafe, or vermin infested and that because of its condition has been designated by an agency that is responsible for the enforcement of housing, building, or fire codes as unfit for human habitation or use;
    - b. The property poses a direct threat to public health or safety in its present condition by reason of environmentally hazardous conditions, solid waste pollution, or contamination;
    - c. Tax or special assessment delinquencies exceeding the fair value of the land that remains unpaid thirty-five (35) days after notice to pay has been mailed.
  2. A parcel that has two or more of the following conditions that, collectively considered, adversely affect surrounding or community property values or entail land use relationships that cannot reasonably be corrected through existing zoning codes or other land use regulations:
    - a. Dilapidation and deterioration;
    - b. Age and obsolescence;
    - c. Inadequate provision for ventilation, light, air, sanitation, or open spaces;
    - d. Unsafe and unsanitary conditions;
    - e. Hazards that endanger lives or properties by fire or other causes;
    - f. Noncompliance with building, housing, or other codes;
    - g. Nonworking or disconnected utilities;
    - h. Is vacant or contains an abandoned structure;
    - i. Excessive dwelling unit density;
    - j. Is located in an area of defective or inadequate street layout;

- k. Overcrowding of buildings on the land;
  - l. Faulty lot layout in relation to size, adequacy, accessibility, or usefulness;
  - m. Vermin infestation;
  - n. Extensive damage or destruction caused by a major disaster when the damage has not been remediated within a reasonable time;
  - o. Identified hazards to health and safety that are conducive to ill health, transmission of disease, juvenile delinquency, or crime;
  - p. Ownership or multiple ownership of a single parcel when the owner, or a majority of the owners of a parcel in the case of multiple ownership, cannot be located.
- B. When determining whether a property is a **blighted** parcel or whether an area is a **blighted** area or slum for the purposes of this section, no person shall consider whether there is a comparatively better use for any premises, property, structure, area, or portion of an area, or whether the property could generate more tax revenues if put to another use.
- C. 1. Notwithstanding any other provision of this section, absent any environmental or public health hazard that cannot be corrected under its current use or ownership, a property is not a **blighted** parcel because of any condition listed in (A) of this section if the condition is consistent with conditions that are normally incident to generally accepted agricultural practices and the land is used for agricultural purposes as **defined** in Section 303.01 or 519.01 of the Revised Code, or the county auditor of the county in which the land is located has determined under Section 5713.31 of the Revised Code that the land is “land devoted exclusively to agricultural use” as **defined** in Section 5713.30 of the Revised Code.
2. A property that under (C) (1) of this section is not a **blighted** parcel shall not be included in a **blighted** area or slum.

(2) Definition of “affordable rents.” *Note:* Grantees may use the definition they have adopted for their CDBG program but should review their existing definition to ensure compliance with NSP program –specific requirements such as continued affordability.

Response:

For any Neighborhood Stabilization Program rental activity, “affordable rents” shall be defined as 30% of the household’s adjusted gross income, less utility allowances as adopted by the Akron Metropolitan Housing Authority for the Section 8 program, as appropriate. The HUD Fair Market Rent schedule for the Akron MSA will be used for this program.

(3) Describe how the grantee will ensure continued affordability for NSP assisted housing.

Response:

The County of Summit will maintain affordability of Neighborhood Stabilization Program assisted rental properties for the periods specified in Section 92.252 of the HOME Program regulations. Restrictive covenants will be placed on assisted properties. Additionally, the County of Summit will monitor rents and tenant income levels during the period of affordability. Second Mortgages provided to home buyers will ensure recapture of NSP funding upon resale of the property. Any recaptured program funds will be used to assist additional homebuyers.

(4) Describe housing rehabilitation standards that will apply to NSP assisted activities.

Response:

All rehabilitation will be done in accordance with Ohio Residential Rehab Standards. In addition, lead hazards controls will be implemented and the Energy Efficiency Standards will be met. All health and safety issues will be corrected under this program.

#### ***D. LOW INCOME TARGETING***

Identify the estimated amount of funds appropriated or otherwise made available under the NSP to be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50 percent of area median income:

The County of Summit has budgeted \$956,500 to provide housing for individuals and families whose incomes do not exceed 50 percent of the area median income.

(Minimum of \$941,786 to meet 25% under NSP)

**Note:** At least 25% of funds must be used for housing individuals and families whose incomes do not exceed 50 percent of area median income.

Response:

The County of Summit has allocated \$956,500 or 25% of the NSP allocation to meet the 25% low income target established for the Neighborhood Stabilization Program. The County will undertake three program components that will house low income persons. These components include Non-Profit Purchase/New Construction (20% of new units), Non-Profit Purchase/Rehab/Re-sell (20% of rehabilitated units) and Non-Profit/Bank Partnership for Lease Purchase (100% of Units).

### **E. ACQUISITIONS & RELOCATION**

Indicate whether grantee intends to demolish or convert any low- and moderate-income dwelling units (i.e.,  $\leq 80\%$  of area median income).

If so, include:

- The number of low- and moderate-income dwelling units—i.e.,  $\leq 80\%$  of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities.
- The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e.,  $\leq 120\%$  of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion).
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.

#### Response:

The NSP program for Summit County will utilize both acquisition for conversion and acquisition for clearance and redevelopment of foreclosed and abandoned properties. The County of Summit will only demolish vacant blighted structures that are no longer suitable for habitation. The County will not acquire low income housing units for conversion or other purposes.

The County of Summit estimates that approximately ten (10) vacant and blighted units will be acquired and demolished under the Land Banking program activity. The activity will require a redevelopment commitment on the part of the owner within a five (5) year period. All clearance and redevelopment funding will be focused in the areas of greatest need.

The following indicates the goals for each of the Neighborhood Stabilization Program Activities.

Activity	Estimated Units	Units 50% Median
Non-Profit Purchase/New Construction	10	2
Non-Profit Purchase/Rehab/Re-sell	15	3
Non-Profit/Bank Partnership for Lease Purchase	15	15
Land Banking	10	

The NSP program will make approximate fifty (50) dwelling units available to households whose incomes do not exceed one hundred and twenty (120%) percent of the area median income. The County has committed twenty (25%) percent of its Neighborhood Stabilization Funds to housing low income persons whose income is fifty

(50%) percent or below of the area median income which is expected to result in fifteen (15) units. The County expects that fifteen units will be made available to households whose income is between fifty-one (51%) percent and eighty (80%) percent of area median income. Additionally the county expects that fifteen (15) units will be made available to households whose median income is between eighty-one (81%) percent and one hundred and twenty (120%) percent of the area median income.

There will be approximately twenty (20) dwelling units to be made available for households whose income does not exceed fifty percent (50%) of area median income.

#### ***F. PUBLIC COMMENT***

Provide a summary of public comments received to the proposed NSP Substantial Amendment.

**Note:** proposed NSP Substantial Amendment must be published via the usual methods and posted on the jurisdiction's website for no less than 15 calendar days for public comment.

#### **Response:**

The County of Summit Department of Community Development placed an ad in the Akron Beacon Journal on Friday, October 17, 2008 inviting inquiry and public comments on the proposed 2008 Annual Action Plan Amendment. The same notice was placed on the Summit County website ([www.summitoh.net](http://www.summitoh.net)). The 2008 Annual Action Plan Amendment was presented to the Summit County CDBG Review Committee on October 22, 2008. Legislation was introduced to the County of Summit Council on November 3, 2008, discussed at County of Summit Council Committee on November 10, 2008 and approved on November 17, 2008.

The County has engaged support from agencies and area non-profits in our efforts to formulate evaluate and select activities to be funded with Neighborhood Stabilization Program funds.

There were no public comments received during the comment period.

Subsequent to the Public Comment period, representatives from the City of Barberton, including Diane Sheridan, the City of Barberton Planning Director, William Judge, City of Barberton Councilman At-Large, and Robert Genet, Mayor of the City of Barberton, attended the County of Summit Council Committee Meeting on November 10, 2008 to express the need for funding in the City of Barberton. Mayor Genet thanked the County of Summit Community Development Department for discussions during the Neighborhood Stabilization Program development and requested ongoing support and funding for the City of Barberton.

**G. NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)**

(1) Activity Name: **Non-Profit Purchase/Demolition/New Construction**

(2) Activity Type: NSP Eligible Use: Demolish blighted structures

CDBG Eligible: Clearance of blighted structures and new housing construction

(3) National Objective: (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e., ≤ 120% of area median income).

Benefit individuals at or below 120% of area median income

(4) Activity Description:

Include a narrative describing the area of greatest need that the activity addresses; the expected benefit to income-qualified persons; and whether funds used for this activity will be used to meet the low income housing requirement for those below 50% of area median income.

NSP funds will be used for the acquisition, demolition of vacant blighted structures for the purpose of redevelopment. The areas of greatest need will receive funding as a priority. All new housing units will be sold to income qualified persons or households. This activity will create additional housing to serve households whose incomes do not exceed 120% of the area median income. Projects must be the demolition of vacant structures that have experienced a foreclosure and cannot be rehabilitated due to structure integrity or economic feasibility reasons.

The County of Summit will utilize program funds to complete two (2) project units which will assist households below the 50% guideline and partially satisfy our low income housing requirement for the Neighborhood Stabilization Program.

(5) Location Description: (Description may include specific addresses, blocks or neighborhoods to the extent known.)

Countywide - The areas of greatest need will be given top priority. The County of Summit has designated twenty-five (25) block groups as the areas of greatest need. A list of the block groups are attached as Appendix 1.

(6) Performance Measures (e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent).

All units will be available for households at or below 120% of the area median income. The County of Summit estimates that ten (10) units will be developed and that two (2) units will be made available to low income persons. It is estimated two (2) units

will be sold to households between 51-80 percent of area median income and six (6) will be sold to households 81-120 percent of area median income.

(7) Total Budget: (Include public and private components)

The County of Summit has budgeted \$500,000 in NSP funding for this activity. The amount of private investment is difficult to estimate. We will invest the least amount of public monies necessary to complete the project in a quality manner. Private investment is anticipated to be at a level equal to or greater than the public investment.

(8) Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)

County of Summit  
Department of Community Development  
175 S. Main Street Suite 207  
Akron, Ohio 44308

(9) Projected Start Date: February 2009

(10) Projected End Date: May 2010

(11) Specific Activity Requirements:

For acquisition activities, include:

- discount rate

The County of Summit will require a minimum discount rate of 5% for all acquisition activities.

For financing activities, include:

- range of interest rates

The County of Summits' assistance will be in the form of a deferred second mortgage on the assisted property which will have a zero percent (0%) interest rate. The mortgage will be subsequent to a reduced principle mortgage amount to ensure that the borrowers' monthly payments are affordable under the program standards.

For housing related activities, include:

- duration or term of assistance;
- tenure of beneficiaries--rental or homeownership;
- a description of how the design of the activity will ensure continued affordability

The amount of assistance provided to each unit will determine the duration of affordability requirements.

All assisted units will comply with the term of affordability requirements of the HOME Program, as specified in Sections 92.252 and 92.255 of the HOME Regulations. This program will directly benefit the income qualified homeowners who purchase the completed homes. The County of Summit will assure affordability through the use of restrictive covenants and ongoing monitoring.

(1) Activity Name: **Non-Profit Purchase/Rehab/Re-sell Program**

(2) Activity Type: NSP Eligible Use: Purchasing and rehabilitating homes and residential properties abandoned or foreclosed.

CDBG Eligible: Acquisition, housing rehabilitation

(3) National Objective: (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e.,  $\leq 120\%$  of area median income).

Benefit individuals at or below 120% of area median income

(4) Activity Description:

Include a narrative describing the area of greatest need that the activity addresses; the expected benefit to income-qualified persons; and whether funds used for this activity will be used to meet the low income housing requirement for those below 50% of area median income.

NSP funds will be provided as gap funding for the acquisition and rehabilitation of vacant structures. Projects will meet affordability standards and create additional, available housing to serve households whose incomes do not exceed 120% of the area median income. Projects must be the rehabilitation of vacant structures that have experienced a foreclosure.

The County of Summit will utilize program funds to complete three (3) project units which will assist households below the 50% guideline and partially satisfy our low income housing requirement for the Neighborhood Stabilization Program.

(5) Location Description: (Description may include specific addresses, blocks or neighborhoods to the extent known.)

Countywide - The areas of greatest need will be given top priority. The County of Summit has designated twenty-five (25%) block groups as the areas of greatest need. A list of the block groups are attached as Appendix 1.

(6) Performance Measures (e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent).

All units will be available for households at or below 120% of the area median income. The County estimates that 15 units will be developed in the manner and that three (3) units will be made available to low income persons (50 percent and below the area median income). It is estimated that four (4) units will be sold to households between 51-80 percent of area median income and that eight (8) will be sold to households 81-120 percent of area median income.

The County of Summit will utilize program funds to complete three (3) project units which will assist households below the 50% guideline and partially satisfy our low income housing requirement for the Neighborhood Stabilization Program.

(7) Total Budget: (Include public and private components)

The County of Summit has budgeted \$782,500 in NSP funding for this activity. The amount of private investment is difficult to estimate. We will invest the least amount of public monies necessary to complete the project in a quality manner. Private investment is anticipated to be at a level equal to or greater than the public investment.

(8) Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)

County of Summit  
Department of Community Development  
175 S. Main Street Suite 207  
Akron, Ohio 44308

(9) Projected Start Date: February 2009

(10) Projected End Date: May 2010

(11) Specific Activity Requirements:

For acquisition activities, include:

- discount rate

The County of Summit will require a minimum discount rate of 5% for all acquisition activities.

For financing activities, include:

- range of interest rates

The County of Summits' assistance will be in the form of a deferred second mortgage on the assisted property which will have a zero percent (0%) interest rate. The mortgage will be subsequent to a reduced principle mortgage amount to ensure that the borrowers' monthly payments are affordable under the program standards.

For housing related activities, include:

- duration or term of assistance;
- tenure of beneficiaries--rental or homeownership;
- a description of how the design of the activity will ensure continued affordability

The amount of assistance provided to each unit will determine the duration of affordability requirements.

All assisted units will comply with the term of affordability requirements of the HOME Program, as specified in Sections 92.252 and 92.255 of the HOME Regulations. This program will directly benefit the income qualified homeowners who purchase the completed homes. The County of Summit will assure affordability through the use of restrictive covenants and ongoing monitoring.

(1) Activity Name: **Foreclosed Property Non-Profit/Bank Partnership –Lease/  
Purchase**

(2) Activity Type: NSP Eligible Use: Purchasing and rehabilitating homes and residential properties abandoned or foreclosed.

CDBG Eligible: Acquisition, housing rehabilitation

(3) National Objective: (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e., ≤ 120% of area median income).

Benefit individuals at or below 120% of area median income

(4) Activity Description:

Include a narrative describing the area of greatest need that the activity addresses; the expected benefit to income-qualified persons; and whether funds used for this activity will be used to meet the low income housing requirement for those below 50% of area median income.

The County of Summit will work with residential lenders who are willing to contribute vacant foreclosed properties to a partnership with a local non-profit agency. The partnership would complete a rehabilitation of the housing unit with private and Neighborhood Stabilization Program funds. Once completed, all project homes will be leased to a low income household. The terms of the lease will stipulate a maximum three year lease with the option to purchase the home at the end of the lease period under predetermined terms. The rental payments must not exceed affordability limits during the lease term. This activity will facilitate homeownership by low income households. Projects must be the rehabilitation of vacant structures that have experienced a foreclosure.

The County of Summit will utilize program funds to complete fifteen (15) project units which will assist households below the 50% guideline and partially satisfy our low income housing requirement for the Neighborhood Stabilization Program.

(5) Location Description: (Description may include specific addresses, blocks or neighborhoods to the extent known.)

Countywide - The areas of greatest need will be given top priority. The County of Summit has designated twenty-five (25) block groups as the areas of greatest need. A list of the block groups are attached as Appendix 1.

(6) Performance Measures (e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent).

All units will be available for households at or below 50% of the area median income. The County estimates that 15 units will be developed in the manner.

The County of Summit will utilize program funds to complete fifteen (15) project units which will assist households below the 50% guideline and partially satisfy our low income housing requirement for the Neighborhood Stabilization Program.

(7) Total Budget: (Include public and private components)

The County of Summit has budgeted \$700,000 in NSP funding for this activity. The amount of private investment is difficult to estimate. We will invest the least amount of public monies necessary to complete the project in a quality manner. Private investment is anticipated to be at a level equal to or greater than the public investment.

(8) Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)

County of Summit  
Department of Community Development  
175 S. Main Street Suite 207  
Akron, Ohio 44308

(9) Projected Start Date: February 2009

(10) Projected End Date: May 2010

(11) Specific Activity Requirements:

For acquisition activities, include:

- discount rate

The County of Summit will require a minimum discount rate of 5% for all acquisition activities.

For financing activities, include:

- range of interest rates

The County of Summits' assistance will be in the form of a deferred second mortgage on the assisted property which will have a zero percent (0%) interest rate. The mortgage will be subsequent to a reduced principle mortgage amount to ensure that the borrowers' monthly payments are affordable under the program standards.

For housing related activities, include:

- duration or term of assistance;
- tenure of beneficiaries--rental or homeownership;
- a description of how the design of the activity will ensure continued affordability

The amount of assistance provided to each unit will determine the duration of affordability requirements.

All assisted units will comply with the term of affordability requirements of the HOME Program, as specified in Sections 92.252 and 92.255 of the HOME Regulations. This program will directly benefit the income qualified homeowners who purchase the completed homes. The County of Summit will assure affordability through the use of restrictive covenants and ongoing monitoring.

(1) Activity Name: **Land Banking**

(2) Activity Type: NSP Eligible Use: Establish land banks for homes that have been foreclosed upon and demolish blighted structures, redevelop demolished or vacant properties.

CDBG Eligible: Acquisition, disposition, Clearance, for blighted structures only and new housing construction.

(3) National Objective: (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e.,  $\leq 120\%$  of area median income).

Benefit individuals at or below 120% of area median income

(4) Activity Description:

Include a narrative describing the area of greatest need that the activity addresses; the expected benefit to income-qualified persons; and whether funds used for this activity will be used to meet the low income housing requirement for those below 50% of area median income.

The County of Summit will use Neighborhood Stabilization Program funds to work with communities, agencies, non-profits and other community partners to acquire and demolish vacant blighted properties for which rehabilitation is not structurally and/or economically feasible. Future use for redevelopment will have to be identified and committed to prior to participation in this County of Summit Neighborhood Stabilization Program activity.

The County of Summit will not be using this activity to meet the low income housing requirement for those below 50% of area median income.

(5) Location Description: (Description may include specific addresses, blocks or neighborhoods to the extent known.)

Countywide - The areas of greatest need will be given top priority. The County of Summit has designated twenty-five block groups as the areas of greatest need. A list of the block groups are attached as Appendix 1.

(6) Performance Measures (e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent).

All units will be available for households at or below 120% of the area median income. The County estimates that 10 units will be developed in the manner.

The County of Summit will only demolish vacant and blighted structures.

(7) Total Budget: (Include public and private components)

The County of Summit has budgeted \$589,930 in NSP funding for this activity. The amount of private investment is difficult to estimate. We will invest the least amount of public monies necessary to complete the project in a quality manner. Private investment is anticipated to be at a level equal to or greater than the public investment.

(8) Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)

County of Summit  
Department of Community Development  
175 S. Main Street Suite 207  
Akron, Ohio 44308

(9) Projected Start Date: February 2009

(10) Projected End Date: May 2010

(11) Specific Activity Requirements:

For acquisition activities, include:

- discount rate

The County of Summit will require a minimum discount rate of 5% for all acquisition activities.

For financing activities, include: range of interest rates

Our assistance will be in the form of a deferred mortgage on the assisted property which will have a zero percent (0%) interest rate. Our mortgage will secure that the property is used for the purpose stated when funding was approved and that any affordability requirements have been met.

For housing related activities, include: duration or term of assistance; tenure of beneficiaries--rental or homeownership; a description of how the design of the activity will ensure continued affordability

The amount of assistance provided to each unit will determine the duration of affordability requirements.

All assisted units will comply with the term of affordability requirements of the HOME Program, as specified in Sections 92.252 and 92.255 of the HOME Regulations. This program will directly benefit the income qualified homeowners who purchase the completed homes. The County of Summit will assure affordability through the use of restrictive covenants and ongoing monitoring.

(1) Activity Name: **Local Community Agreements**

(2) Activity Type: NSP Eligible Use: Establish land banks for homes that have been foreclosed upon and demolish blighted structures, redevelop demolished or vacant properties.

CDBG Eligible: Acquisition, disposition, Clearance, for blighted structures only and new housing construction.

(3) National Objective: (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e.,  $\leq$  120% of area median income).

Benefit individuals at or below 120% of area median income

(4) Activity Description:

Include a narrative describing the area of greatest need that the activity addresses; the expected benefit to income-qualified persons; and whether funds used for this activity will be used to meet the low income housing requirement for those below 50% of area median income.

The County of Summit will use Neighborhood Stabilization Program funds to work with communities to acquire, demolish and redevelop vacant blighted properties for which rehabilitation is not structurally and/or economically feasible. Future use for redevelopment will have to be identified and committed to prior to participation in this County of Summit Neighborhood Stabilization Program activity.

The County of Summit will not be using this activity to meet the low income housing requirement for those below 50% of area median income.

(5) Location Description: (Description may include specific addresses, blocks or neighborhoods to the extent known.)

Countywide - The areas of greatest need will be given top priority. The County of Summit has designated twenty-five block groups as the areas of greatest need. A list of the block groups are attached as Appendix 1.

(6) Performance Measures (e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent).

All units will be available for households at or below 120% of the area median income.

(7) Total Budget: (Include public and private components)

The County of Summit has budgeted \$800,000 in NSP funding for this activity. The amount of private investment is difficult to estimate. We will invest the least amount of public monies necessary to complete the project in a quality manner. Private investment is anticipated to be at a level equal to or greater than the public investment.

(8) Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)

County of Summit  
Department of Community Development  
175 S. Main Street Suite 207  
Akron, Ohio 44308

(9) Projected Start Date: February 2009

(10) Projected End Date: May 2010

(11) Specific Activity Requirements:

For acquisition activities, include:

- discount rate

The County of Summit will require a minimum discount rate of 5% for all acquisition activities.

For financing activities, include: range of interest rates

Our assistance will be in the form of a deferred mortgage on the assisted property which will have a zero percent (0%) interest rate. Our mortgage will secure that the property is used for the purpose stated when funding was approved and that any affordability requirements have been met.

For housing related activities, include: duration or term of assistance; tenure of beneficiaries--rental or homeownership; a description of how the design of the activity will ensure continued affordability

The amount of assistance provided to each unit will determine the duration of affordability requirements.

All assisted units will comply with the term of affordability requirements of the HOME Program, as specified in Sections 92.252 and 92.255 of the HOME Regulations. This program will directly benefit the income qualified homeowners who purchase the completed homes. The County of Summit will assure affordability through the use of restrictive covenants and ongoing monitoring.

1) Activity Name: **Administration and Planning**

(2) Activity Type: NSP Eligible Use: Program administration (maximum of 10%)

CDBG Eligible: Administration and planning activities as defined by 24 CFR 570.205 and 206

(3) National Objective: (Must be a national objective benefiting low, moderate and middle income persons, as defined in the NSP Notice—i.e.,  $\leq 120\%$  of area median income).

Administrative and planning activities are exempt from the national objective requirement.

(4) Activity Description:

Include a narrative describing the area of greatest need that the activity addresses; the expected benefit to income-qualified persons; and whether funds used for this activity will be used to meet the low income housing requirement for those below 50% of area median income.

The County of Summit will use Neighborhood Stabilization Program funds to plan and administer the program activities. The administrative costs will include personnel, operating expenses, eligible indirect costs, program evaluation costs and other incidental administrative expenses.

The County of Summit will not be using this activity to meet the low income housing requirement for those below 50% of area median income.

(5) Location Description: (Description may include specific addresses, blocks or neighborhoods to the extent known.)

There is no location related to this activity.

(6) Performance Measures (e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent).

There is no performance measurement for administrative expenses.

(7) Total Budget: (Include public and private components)

The County of Summit has budgeted \$374,714 in NSP funding for this activity. There will be no private investment in this activity.

(8) Responsible Organization: (Describe the responsible organization that will implement the NSP activity, including its name, location, and administrator contact information)

County of Summit  
Department of Community Development  
175 S. Main Street Suite 207  
Akron, Ohio 44308

(9) Projected Start Date: February 2009

(10) Projected End Date: May 2010

(11) Specific Activity Requirements:

For acquisition activities, include:

- discount rate

There is no applicable discount rate for administrative activities.

For financing activities, include:

- range of interest rates

There is no applicable interest rate for administrative activities.

or housing related activities, include:

- duration or term of assistance;
- tenure of beneficiaries--rental or homeownership;
- a description of how the design of the activity will ensure continued affordability

This is not a housing related activity.



**APPENDIX 1 – County of Summit, Ohio  
Areas of Greatest Need**

**25 Priority Block Groups**

LOGRECNO	Community	CDBG_Name	Tract	BG	Rank
OH0044656	Copley township	SUMMIT CO	533400	5	1
OH0044534	Barberton city	BARBERTON	510301	3	2
OH0044526	Barberton city	BARBERTON	510200	1	3
OH0044553	Barberton city	BARBERTON	510500	2	4
OH0044555	Barberton city	BARBERTON	510500	4	5
OH0044528	Barberton city	BARBERTON	510200	3	6
OH0044923	Lakemore village	SUMMIT CO	531101	2	7
OH0044523	Barberton city	BARBERTON	510100	3	8
OH0044521	Barberton city	BARBERTON	510100	1	9
OH0045099	Springfield township	SUMMIT CO	531002	1	10
OH0044527	Barberton city	BARBERTON	510200	2	11
OH0045104	Springfield township	SUMMIT CO	531002	6	12
OH0044545	Barberton city	BARBERTON	510400	1	13
OH0044554	Barberton city	BARBERTON	510500	3	14
OH0045103	Springfield township	SUMMIT CO	531002	5	15
OH0044532	Barberton city	BARBERTON	510301	1	16
OH0045212	Twinsburg township	SUMMIT CO	530102	5	17
OH0045003	Norton city	SUMMIT CO	532001	6	18
OH0044529	Barberton city	BARBERTON	510200	4	19
OH0044552	Barberton city	BARBERTON	510500	1	20
OH0044522	Barberton city	BARBERTON	510100	2	21
OH0045101	Springfield township	SUMMIT CO	531002	3	22
OH0045102	Springfield township	SUMMIT CO	531002	4	23
OH0045107	Springfield township	SUMMIT CO	531101	1	24
OH0044533	Barberton city	BARBERTON	510301	2	25



## CERTIFICATIONS

- (1) **Affirmatively furthering fair housing.** The jurisdiction will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.
- (2) **Anti-lobbying.** The jurisdiction will comply with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
- (3) **Authority of Jurisdiction.** The jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.
- (4) **Consistency with Plan.** The housing activities to be undertaken with NSP funds are consistent with its consolidated plan, which means that NSP funds will be used to meet the congressionally identified needs of abandoned and foreclosed homes in the targeted area set forth in the grantee's substantial amendment.
- (5) **Acquisition and relocation.** The jurisdiction will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the Notice for the NSP program published by HUD.
- (6) **Section 3.** The jurisdiction will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- (7) **Citizen Participation.** The jurisdiction is in full compliance and following a detailed citizen participation plan that satisfies the requirements of Sections 24 CFR 91.105 or 91.115, as modified by NSP requirements.
- (8) **Following Plan.** The jurisdiction is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.
- (9) **Use of funds in 18 months.** The jurisdiction will comply with Title III of Division B of the Housing and Economic Recovery Act of 2008 by using, as defined in the NSP Notice, all of its grant funds within 18 months of receipt of the grant.
- (10) **Use NSP funds  $\leq$  120 of AMI.** The jurisdiction will comply with the requirement that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income.
- (11) **Assessments.** The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by

**APPENDIX 3 – County of Summit, Ohio**

Page 2

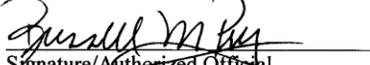
assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

(12) **Excessive Force.** The jurisdiction certifies that it has adopted and is enforcing: (1) a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and (2) a policy of enforcing applicable State and local laws against physically barring entrance to or exit from, a facility or location that is the subject of such non-violent civil rights demonstrations within its jurisdiction.

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

(14) **Compliance with lead-based paint procedures.** The activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K, and R of this title.

(15) **Compliance with laws.** The jurisdiction will comply with applicable laws.

  
\_\_\_\_\_  
Signature/Authorized Official  
RUSSELL M. PRY  
EXECUTIVE  
\_\_\_\_\_  
Title

11/20/18  
Date

APPENDIX 4 – County of Summit, Ohio  
Page 1 Advertising – Public Comment

Page D6

Akron Beacon Journal • Friday, October 17, 2008

**AMENDMENT TO  
THE 2008 ACTION  
PLAN FOR  
NEIGHBORHOOD  
STABILIZATION  
PROGRAM**

The County of Summit Executive's Department of Community and Economic Development will present the County's Amendment to its 2008 Action Plan for Community Development Block Grant Neighborhood Stabilization Program allocated by the U.S. Department of Housing and Urban Development to Summit County Council on November 10, 2008, at 4:30 P.M. in Council Chambers, 7th Floor, 175 South Main Street, Akron, OH 44308.

Comments from citizens of Summit County residing outside the city of Akron regarding the proposed amendment to the 2008 Action Plan may be submitted verbally or in writing to either Kathy Petsko (330) 643-2566 or Elizabeth Rogers (330) 643-2893 at 175 South Main Street, Room 207, Akron, Ohio 44308.

The Summit County Executive's Department of Community and Economic Development has prepared a substantial amendment to the 2008 Action Plan for the expenditure of Community Development Block Grant Neighborhood Stabilization Program funds. The County has developed programs designed to meet current needs of Summit County neighborhoods to eliminate blight caused by vacant, abandoned and/or foreclosed properties.

A summary of the proposed programs for the Neighborhood Stabilization Program will be available for review on the County's website at [www.co.summit.oh.us/executive/dev.htm](http://www.co.summit.oh.us/executive/dev.htm) on October 20, 2008. The fifteen day public comment period begins as of the date of this advertisement.

Comments will be accepted within 15 days of the date of publication of this notice. Comments received will be submitted with the Amendment to the U.S. Department of Housing and Urban Development on December 1, 2008.  
Oct 17

**2008 Annual Action Plan Amendment**

Under the Housing and Economic Recovery Act of 2008, the County of Summit will be receiving additional funding under the 2008 CDBG Plan Year. The County must prepare a Substantial Plan Amendment to describe the activities to be undertaken with the additional funding. The funds are provided as Neighborhood Stabilization Program (NSP) Funds with the purpose of addressing the blighting influence of foreclosed and abandoned properties on our communities.

The County will be receiving \$3,767,144 which is to be used to address the areas of highest need with the exception of the City of Akron which is receiving allocations from the federal and state governments.

The Summit County Executives Office of Community Development with the assistance of the Summit County Planning Department has evaluated the entirety of the County excluding the City of Akron. The evaluation included the review of foreclosure date from 2005-2008, low-mod census block groups and the HUD Foreclosure risk factor to rank the census block groups in order of need.

Activities eligible to be assisted by NSP funds include the acquisition, rehabilitation and resale of foreclosed or abandoned properties. The acquisition, demolition and new construction on a foreclosed/abandoned property are also eligible for funding. The program must expend 25% of its funding to house low income persons, or those households who have incomes at or below 50% of the median income. It is the intent of the County of Summit to apply its allocation to the areas of greatest need in the county outside of the City of Akron. Individual neighborhoods will be targeted based on the evaluation described above. Both rehabilitation and new construction on foreclosed properties will be undertaken. The County will enter into partnerships with non-profit development organizations and lenders or loan servicers with inventories of real estate owned (REO) to accomplish these activities. Rehabilitated or newly constructed housing will then be available to persons or households with incomes less than 120% of the Akron area median income. These funds cannot be used for any purpose not described above.

Comments on the Neighborhood Stabilization Program may be submitted in writing or verbally to Kathy Petsko or Elizabeth Rogers, Executives Department of Community and Economic Development, 175 S. Main Street, Akron, OH 44308. Phone numbers are 330-643-2566 and 330-643-2893 respectively.

# NSP Substantial Amendment Checklist

*For the purposes of expediting review, HUD asks that applicants submit the following checklist along with the NSP Substantial Amendment and SF-424.*

## Contents of an NSP Action Plan Substantial Amendment

Jurisdiction(s): <u>County of Summit</u> Lead Agency <u>County of Summit, Executives Department of Community Development</u> Jurisdiction Web Address: <a href="http://www.co.summit.oh.us/executive/dev.htm">http://www.co.summit.oh.us/executive/dev.htm</a>	NSP Contact Person: <u>Elizabeth A. Rogers</u> Address: <u>175 S. Main Street Suite 207 Akron, Ohio 44308</u> Telephone: <u>330-643-8623</u> Fax: <u>330-643-2886</u> Email: <u>erogers@summitoh.net</u>
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The elements in the substantial amendment required for the Neighborhood Stabilization Program are:

**A. AREAS OF GREATEST NEED**

Does the submission include summary needs data identifying the geographic areas of greatest need in the grantee’s jurisdiction?

Yes  No . Verification found on page 3-6.

**B. DISTRIBUTION AND USES OF FUNDS**

Does the submission contain a narrative describing how the distribution and uses of the grantee’s NSP funds will meet the requirements of Section 2301(c) (2) of HERA that funds be distributed to the areas of greatest need, including those with the greatest percentage of home foreclosures, with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures?

Yes  No . Verification found on page 7-8.

*Note:* The grantee’s narrative must address the three stipulated need categories in the NSP statute, but the grantee may also consider other need categories.

**C. DEFINITIONS AND DESCRIPTIONS**

For the purposes of the NSP, do the narratives include:

- a definition of “blighted structure” in the context of state or local law,  
 Yes  No . Verification found on page 8-9.
- a definition of “affordable rents,”  
 Yes  No . Verification found on page 9.

- a description of how the grantee will ensure continued affordability for NSP assisted housing,  
Yes  No . Verification found on page 9-10.
- a description of housing rehabilitation standards that will apply to NSP assisted activities?  
Yes  No . Verification found on page 10.

**D. LOW INCOME TARGETING**

- Has the grantee described how it will meet the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?  
Yes  No . Verification found on page 10.
- Has the grantee identified how the estimated amount of funds appropriated or otherwise made available will be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50% of area median income?  
Yes  No . Verification found on page 10, 13, 14, 16, 17, 19&20.  
Amount budgeted = \$ 956,500.

**E. ACQUISITIONS & RELOCATION**

Does grantee plan to demolish or convert any low- and moderate-income dwelling units?

Yes  No . (If no, continue to next heading)  
Verification found on page \_\_\_\_\_.

If so, does the substantial amendment include:

- The number of low- and moderate-income dwelling units—i.e., ≤ 80% of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities?  
Yes  No . Verification found on page \_\_\_\_\_.
- The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e., ≤ 120% of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion)?  
Yes  No . Verification found on page \_\_\_\_\_.
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income?  
Yes  No . Verification found on page \_\_\_\_\_.

**F. PUBLIC COMMENT PERIOD**

Was the proposed action plan amendment published via the grantee jurisdiction’s usual methods and on the Internet for no less than 15 calendar days of public comment?

Yes  No  Verification found on page 12 & Appendix 4.

Is there a summary of citizen comments included in the final amendment?

Yes  No  Verification found on page 12.

**G. INFORMATION BY ACTIVITY**

Does the submission contain information by activity describing how the grantee will use the funds, identifying:

- eligible use of funds under NSP,  
Yes  No  Verification found on page 13, 16, 19, 22, 24.
- correlated eligible activity under CDBG,  
Yes  No  Verification found on page 13, 16, 19, 22, 24.
- the areas of greatest need addressed by the activity or activities,  
Yes  No  Verification found on page 13, 16, 19, 22, 24.
- expected benefit to income-qualified persons or households or areas,  
Yes  No  Verification found on page 13, 16, 19, 22, 24.
- does the applicant indicate which activities will count toward the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?  
Yes  No  Verification found on page 13, 16, 19.
- appropriate performance measures for the activity,  
Yes  No  Verification found on page 13, 16, 19, 22, 24.
- amount of funds budgeted for the activity,  
Yes  No  Verification found on page 14, 17, 20, 23, 25.
- the name, location and contact information for the entity that will carry out the activity,  
Yes  No  Verification found on page 14, 17, 20, 23, 25.
- expected start and end dates of the activity?  
Yes  No  Verification found on page 14, 17, 20, 23, 25.
- If the activity includes acquisition of real property, the discount required for acquisition of foreclosed upon properties,  
Yes  No  Verification found on page 14, 17, 20, 23, 25.

- If the activity provides financing, the range of interest rates (if any),  
Yes  No . Verification found on page 14, 17, 20, 23, 25.
- If the activity provides housing, duration or term of assistance,  
Yes  No . Verification found on page 14, 17, 20, 23, 25.
- tenure of beneficiaries (e.g., rental or homeownership),  
Yes  No . Verification found on page 14, 17, 20, 23, 25.
- does it ensure continued affordability?  
Yes  No . Verification found on page 14, 17, 20, 23, 25.

**H. CERTIFICATIONS**

The following certifications are complete and accurate:

- |  |   |                             |
|--|---|-----------------------------|
| (1) Affirmatively furthering fair housing                  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (2) Anti-lobbying  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) Authority of Jurisdiction                              | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (4) Consistency with Plan                                  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (5) Acquisition and relocation                             | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (6) Section 3  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (7) Citizen Participation                                  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (8) Following Plan   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (9) Use of funds in 18 months                              | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (10) Use NSP funds ≤ 120 of AMI                            | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (11) No recovery of capital costs thru special assessments | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (12) Excessive Force                                       | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (13) Compliance with anti-discrimination laws              | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (14) Compliance with lead-based paint procedures           | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (15) Compliance with laws                                  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |