



**2016  
Annual  
Action Plan**

**Hamilton County, Ohio**

**January 15, 2016**

## Hamilton County, Ohio 2016 Annual Action Plan Summary

Hamilton County presents the 2016 Annual Action Plan which outlines the housing and community development needs and objectives for the period of March 1, 2016 to February 28, 2017. Programs in the plan are funded through these three grants from the US Department of Housing and Urban Development (HUD):

- Community Development Block Grant (CDBG)
- HOME Investment Partnership Program (HOME)
- Emergency Solutions Grant (ESG)

2016 grants are estimated only. We assumed flat resources for now and will make changes in direct proportion to the actual grant amounts received. For example, if a grant is cut by 5%, all projects and programs will be cut by 5%.

<b>Community Development Block Grant (CDBG)</b>		
	<b>2015</b>	<b>2016</b>
Grant	2,879,974	2,879,974
Est Program Income	60,000	60,000
Prior Year Resources*	<u>1,284,315</u>	<u>150,000</u>
Estimated Total Resources	4,226,304	3,089,974
<b>HOME Investment Partnership Program (HOME)</b>		
	<b>2015</b>	<b>2016</b>
Grant	894,563	894,563
Est Program Income	5,000	5,000
Prior Year Resources*	<u>330,900</u>	<u>700,000</u>
Estimated Total Resources	1,232,478	1,599,563
<b>Emergency Solutions Grant (ESG)</b>		
	<b>2015</b>	<b>2016</b>
Grant	257,987	257,987
Est Program Income	0	0
Prior Year Resources*	<u>0</u>	<u>0</u>
Estimated Total Resources	260,002	257,987

\*A larger than usual amount of prior year resources was allocated in 2015 due to HUD accounting changes. In 2016, we are phasing out the Tenant Based Rental Assistance (TBRA) Program and will be reprogramming any remaining funds for affordable housing development projects. The estimated amount of 2015 remaining is \$700K. Projects will likely including rental, homeownership and transitional housing and may be acquisition, new construction and/or acquisition/rehab.

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

**The CDBG allocation for 2016 is estimated at \$2,879,974.** All programs and projects funded total \$3,090,000. The difference between the proposed allocation and project budget will be covered through prior year contingency and program income funds. Over 95% of the CDBG projects will benefit low to moderate income persons and areas. Slum and blight removal projects total \$140,000 and no projects will result in relocation.

### **HOME Investment Partnerships Program (HOME)**

**The HOME allocation for 2016 is estimated at \$899,563.** Projects funded under the HOME Program total \$899,563. The 2016 budget is quite different from years past where a majority of the HOME funds were used on Tenant Based Rental Assistance (TBRA) programs. The TBRA program is currently being phased out and will end in the first half of the year using 2015 funds. The Cincinnati Metropolitan Housing Authority has provided vouchers for these clients beginning February 1, 2016. There are no 2016 HOME dollars allocated towards this activity. Approximately 75% (\$675,923) of the 2016 HOME budget will be directed towards housing development projects, specifically larger-scale rental housing for seniors, disabled persons, veterans, or others with special needs. We estimate that \$700,00 in 2015 funds will remain after the TBRA program ends which will also be used for affordable housing projects. Projects will likely include rental, homeownership and transitional housing and may be acquisition, new construction and/or acquisition/rehab. A Request for Proposals will be published to solicit potential projects for this HOME funding. Ten percent of the grant will be used for administrative costs and the remaining 15% will be directed towards Community Housing Development Organizations (CHDO) projects as required by HUD. These will include smaller scale homeownership and/or rental housing projects completed by a certified CHDO.

### **Emergency Solutions Grant (ESG)**

**The ESG allocation for 2016 is estimated at \$257,987.** All of these funds will be provided to Strategies to End Homelessness to administer homeless prevention and outreach programs. Strategies to End Homelessness serves as the Continuum of Care agency for Cincinnati and Hamilton County as required by HUD. City funds are allocated to shelters, homeless prevention programs and administration. County funds are allocated to rapid rehousing programs and administration.

### **Public Hearing and Review**

The draft 2016 Annual Action Plan was written with the assumption that 2016 grant amounts will be flat with 2015 grant amounts. Hamilton County will hold a public hearing on December 16, 2015 to consider this first draft, which includes activities and projects to be funded during the 2016 program year. This hearing fulfills the requirements of Hamilton County's Citizen Participation Plan for the 2016 program year.

A draft of the 2016 Action Plan will be made available, both online and in our offices, for public review and comment between December 4, 2015 and January 5, 2016. Comments received will be added to the Plan.

### **Approvals**

It is anticipated that the Board of County Commissioners will approve the Action Plan on January 6, 2016; and submission to the Department of Housing and Urban Development (HUD) will occur by January 15, 2016. HUD will review the plan with approval expected by February 28, 2016. We must wait until we receive our grant amounts from HUD prior to submitting the plan but must be ready to submit 45 days prior to our grant start date of March 1.



## Attachment A - 2016 Annual Action Plan Budget

<b>Community Development Block Grant (CDBG)</b>		
<b>Community</b>	<b>Project Name</b>	<b>Amount</b>
Anderson Township	Acquisition and Demolition	50,000
Cheviot	Francis Avenue Rehabilitation	150,000
Cleves	Street Improvements	50,000
Deer Park	O'Leary Street Improvements	85,000
Delhi Township	Senior Center Parking Improvements	175,000
Forest Park	Kanter Park Improvements	30,000
Golf Manor	Home Improvement Repair Program	15,000
Greenhills	Home Improvement Repair Program	20,000
Harrison	Senior Center Roof	75,000
Harrison Township	Senior Center Roof	75,000
Lincoln Heights	EMS Staffing	31,000
Miami Township	Senior Center Parking Improvements	75,000
Mt. Healthy	Acquisition and Demolition	20,000
North Bend	Presidential Park Improvements	30,000
Norwood	Streets/Curbs/Sidewalk Improvements	100,000
Norwood	Streetscape Improvements	25,000
Norwood	Youth Dental Program	10,000
Sharonville	Gower Park ADA Improvements	68,000
Springdale	Home Improvement Repair Program	15,000
Springfield Township	West College Hill Neighborhood Services	68,000
Whitewater Township	Senior Center Improvements	109,000
Woodlawn	Pedestrian Bridge Reconstruction	100,000
Wyoming	Civic Center Accessibility Upgrades	127,000
<b>COMMUNITY PROJECTS TOTAL</b>		<b>1,503,000</b>

<b>Community Development Block Grant (CDBG) (continued)</b>		
<b>Agency</b>	<b>Program Name</b>	<b>Amount</b>
Freestore Foodbank	Emergency Food Services	100,000
H.O.M.E.	Fair Housing	85,000
H.O.M.E.	HCV Mobility Program	30,000
Ham. Co. Planning & Dev.	Administration	285,000
Ham. Co. Planning & Dev.	Planning / Mini-Grants	70,000
Ham. Co. Planning & Dev.	Rental Accessibility Modifications	50,000
Ham. Co. Planning & Dev.	Spot Demolition	25,000
Ham. Co. Planning & Dev.	Water/Sewer Grant Program	25,000
HCDC	Economic Development & Admin	50,000
HCDC	Urban Land Assistance Program	45,000
Ohio Valley Goodwill	Homeless Reintegration Project	60,000
People Working Cooperatively	Home Repair Program	700,000
Strategies to End Homelessness	Homeless Services Administration	62,000
<b>COUNTY-WIDE PROJECTS TOTAL</b>		<b>1,587,000</b>
<b>TOTAL ALL CDBG PROJECTS</b>		<b>3,090,000</b>

<b>Home Investment Partnership Program (HOME)</b>		
<b>Agency</b>	<b>Project Name</b>	<b>Amount</b>
Ham. Co. Plan. Dev.	CHDO Housing Development (required 15% of budget)	134,184
Ham. Co. Plan. Dev.	Other Housing Development Projects	675,923
Ham. Co. Plan. Dev.	Administration	89,456
<b>TOTAL ALL HOME PROJECTS</b>		<b>899,563</b>

<b>Emergency Solutions Grant (ESG)</b>		
<b>Agency</b>	<b>Project Name</b>	<b>Amount</b>
Strategies to End Homelessness	Homelessness Prevention/Rapid Rehousing Activities	238,638
Strategies to End Homelessness	Administration	19,349
<b>TOTAL ALL ESG PROJECTS</b>		<b>257,987</b>

# Hamilton County 2016 Annual Action Plan

Action Plan Section	Page Number
Action Plan	
AP-15 Expected Resources.....	1
AP-20 Annual Goals and Objectives.....	6
AP-35 Projects.....	10
AP-38 Project Summary .....	11
AP-50 Geographic Distribution .....	18
AP-55 Affordable Housing.....	19
AP-60 Public Housing.....	20
AP-65 Homeless and Other Special Needs Activities.....	23
AP-75 Barriers to Affordable Housing.....	28
AP-85 Other Actions.....	30
AP-90 Program Specific Requirements .....	33

## Attachments

- Attachment A: 2016 Annual Action Plan by Grant, Community and Programs & Projects
- Attachment B: 2016 Annual Action Plan by Goals, Programs & Projects and Outcomes
- Attachment C: 2015-2019 Analysis of Impediments to Fair Housing and Action Plan Update
- Attachment D: Public Hearing – Advertisements and Comments Received

## Expected Resources

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

#### Introduction

The 2016 Action Plan is based on flat CDBG funds due to the addition of the City of Harrison to the County program which will offset anticipated decrease due to participating jurisdictions being added to the grant formula. HOME and ESG funds expected to remain flat for 2016.

Resources for 2017, 2018 and 2019 are estimated at flat funding levels as well.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,879,974	60,000	150,000	3,089,974	9,269,922	2016 estimate based on 2% cut from 2015 grant amount – but this is offset with addition of the City of Harrison to the County program. 2017-2019 assume to be flat with 2016 estimate

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	894,563	5,000	700,000	1,599,563	2,700,000	All estimates assume flat funding with 2015 grant amount. We are phasing out the Tenant Based Rental Assistance (TBRA) Program and will be reprogramming any remaining funds for affordable housing development projects. The estimated amount of 2015 remaining is \$700K. Projects will likely including rental, homeownership and transitional housing and may be acquisition, new construction and/or acquisition/rehab.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	257,987	0	0	257,987	1,040,000	All estimates assume flat funding with 2015 grant amount

Table 1 - 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**

CDBG

CDBG projects leverage funds from a variety of sources. Communities undertaking large capital improvement projects often receive State Capital Improvement Program (SCIP) funds and or Local Transportation Improvement Program funds (LTIP). The funds are awarded by the State of Ohio on a competitive basis. The County requires each local government to pay for engineering and design of construction projects using general funds which provides some additional financial leverage, but also shows that they are invested in the grant projects. Often, participating communities will contribute their capital improvement or general funds to a project to fill a gap.

Some communities generate local funds through Tax Increment Financing. TIF is an economic development mechanism available to local governments in Ohio to finance public infrastructure improvements and, in certain circumstances, residential rehabilitation. A TIF works by locking in the taxable worth of real property at the value it holds at the time the authorizing legislation was approved. Payments derived from the increased assessed value of any improvement to real property beyond that amount are directed towards a separate fund to finance the construction of public infrastructure defined within the TIF legislation.

HOME

Matching funds for HOME Program activities are provided by non-federal sources of funds received by the Excel Development agency that operates a TBRA program for mentally disabled individuals. The annual match of approximately \$325,000 is more than enough to meet HOME match requirements. Other possible sources of match include the value of labor, donated materials, equipment and professional services donated to County CHDOs constructing or rehabbing affordable housing. Sweat equity provided by Habitat for Humanity future homeowners may also be contributed.

ESG

Match requirements for the ESG Program are met through donations from the business community and private foundations, as well as other funding sources to the Continuum of Care lead agency, Strategies to End Homelessness.

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

N/A

**Discussion**

Many of the CDBG projects proposed for the 2016 Action Plan are for public infrastructure improvements and public facility improvements. These are owned by each separate city, village or township.

Two CDBG programs - Spot Demolition Program and Urban Land Assistance Program – provide funds for demolition for buildings. Some of these buildings may be publicly owned and some may be privately owned.

### AP-20 Annual Goals and Objectives - Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Priority Needs Addressed	Funding	Goal Outcome Indicator
1	Eliminate Slum and Blight	2016	2016	Non-Housing Community Development	County Wide		CDBG: \$140,000	Buildings Demolished: 14 Buildings
2	Further Fair Housing	2016	2016	Affordable Housing Homeless	County Wide	Reducing Homelessness Increasing Affordable Housing	CDBG: \$115,000	Public service activities for Low/Moderate Income Housing Benefit: 125 Households Assisted
3	Improve Public Facilities	2016	2016	Non-Housing Community Development	Participating Jurisdictions	Improving Public Facilities and Infrastructure	CDBG: \$864,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10,000 Persons Assisted Other: 10 Other
4	Improve Public Infrastructure	2016	2016	Non-Housing Community Development	Participating Jurisdictions	Improving Public Facilities and Infrastructure	CDBG: \$410,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10,000 Persons Assisted
5	Improve Quality of Life	2016	2016	Non-Housing Community Development	County Wide		CDBG: \$209,000	Public service activities other than Low/Moderate Income Housing Benefit: 25,000 Persons Assisted

6	Provide Affordable Housing for Homeowners	2016	2016	Affordable Housing	County Wide	Increasing Affordable Housing	CDBG: \$775,000 HOME: \$250,000	Homeowner Housing Added: 4 Household Housing Unit Homeowner Housing Rehabilitated: 650 Household Housing Unit
7	Provide Affordable Housing for Renters	2016	2016	Affordable Housing	County Wide	Increasing Affordable Housing	CDBG: \$50,000 HOME: \$1,300,000	Rental units rehabilitated: 19 Household Housing Unit
8	Serve Homeless Families and Reduce Homelessness	2016	2016	Homeless	County Wide	Reducing Homelessness Increasing Affordable Housing	CDBG: \$60,000 ESG: \$240,000	Tenant-based rental assistance / Rapid Rehousing: 30 Households Assisted Homeless Person Overnight Shelter: 5,000 Persons Assisted Homelessness Prevention: 60 Persons Assisted
9	Spur Economic Development	2016	2016	Non-Housing Community Development	County Wide		CDBG: \$50,000	Businesses assisted: 10 Businesses Assisted

**Table 2 – Goals Summary**

#	Name	Goal Descriptions
1	<b>Goal Name</b>	Eliminate Slum and Blight
	<b>Goal Description</b>	Eliminate slum and blight throughout the County through County Wide Spot Demolition and Urban Land Assistance Programs as well as through jurisdiction specific projects as requested annually.
2	<b>Goal Name</b>	Further Fair Housing
	<b>Goal Description</b>	Further fair housing through the Fair Housing Program with Housing Opportunities Made Equal (HOME), Housing Choice Voucher Mobility Program, Modifications for Mobility Program, and Tenant Based Rental Assistance Programs.
3	<b>Goal Name</b>	Improve Public Facilities
	<b>Goal Description</b>	Improve public facilities throughout the County as requested by participating jurisdictions. Frequently, funds are used for parks and senior centers,
4	<b>Goal Name</b>	Improve Public Infrastructure
	<b>Goal Description</b>	Improve Public Infrastructure throughout the County as requested by participating jurisdictions. This could include streetscape improvements, street paving, fire hydrant replacement, etc.
5	<b>Goal Name</b>	Improve Quality of Life
	<b>Goal Description</b>	Improve Quality of Life through public services throughout the County.
6	<b>Goal Name</b>	Provide Affordable Housing for Homeowners
	<b>Goal Description</b>	Provide Affordable Housing for Homeowners throughout the County through the Housing Repair Services and Housing Development/Homebuyer Assistance Programs, as well as city/village/township specific Home Repair Programs as requested by participating jurisdictions.
7	<b>Goal Name</b>	Provide Affordable Housing for Renters

	<b>Goal Description</b>	Provide Affordable Housing for Renter through the Tenant Based Rental Assistance (TBA) Program, Modifications for Mobility Program, and Housing Development/Homebuyer Assistance Program. Related programs and outcomes for TBRA (Excel and STEH) as well as Homeless Prevention/Rapid Rehousing, are also listed under "Serve Homeless Families and Reduce Homelessness". They are not included here to avoid duplication in the outcomes totals.
<b>8</b>	<b>Goal Name</b>	Serve Homeless Families and Reduce Homelessness
	<b>Goal Description</b>	Serve Homeless Families and Reduce Homelessness through STEH as well as Homeless Prevention/Rapid Rehousing, and Emergency Shelter Grant Administration programs. Related programs and outcomes for Housing Development/Homebuyer Assistance Program are also listed under "Provide Affordable Housing for Renters". They are not included here to avoid duplication in the outcomes totals.
<b>9</b>	<b>Goal Name</b>	Spur Economic Development
	<b>Goal Description</b>	Spur Economic Development through the County's Planning + Development Department and HCDC, the County's contractual agency for all economic development related activities, and their programs. Programs may include corridor development studies, small business loans, planning services, etc. Funding is also provided annually for economic development programs, such as facade improvement programs, selected each year after participating jurisdictions request funds

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

Hamilton County will be funding 26 projects requested by and located in participating communities. These projects include street improvements, park improvements, senior center improvements, operating funds for social service providers and demolition projects. In addition, five county-wide activities will be funded which will directly benefit low to moderate income families by providing services such as homeowner repairs, water and sewer upgrade grants and mobility counseling for Housing Choice Voucher Program participants. Other funds will provide operational support to social service agencies that provide a variety of services to low income clientele. Finally, a portion of County-wide funds are directed toward eliminating both residential and commercial slum and blight.

#### Projects

#	Project Name
1	Acquisition and Demolition of Blighted Properties
2	Fair Housing Services
3	Housing Choice Voucher Mobility
4	Public Facility Improvements
5	Public Infrastructure Improvements
6	Public Services
7	Homeowner Repairs and Improvements
8	Housing Development – CHDO Projects
9	Other Housing Development Projects & Programs
10	Housing Mobility Improvements
11	Homelessness Prevention and Rapid Rehousing
12	Services to Homeless Families
13	Economic Development Programs
14	Administration

**Table 3 – Project Information**

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

All allocation decisions are influenced by the needs of the County; feedback from residents and leaders and the Community Development Advisory Committee; and direction of the County Commission. About 50% of CDBG is used for requested projects, programs and services, and the remaining 50% is allocated to county wide programs and services. HOME funds are allocated to the TBRA program, CHDO development projects, and other eligible housing programs. ESG funds are allocated to prevention and rapid rehousing because the City's ESG funds are allocated at the maximum level to shelters.

## AP-38 Project Summary

### Project Summary Information

The 2016 Action Plan programs and projects are similar to 2015 programs and projects with changes to individual local governments' projects. We also are phasing out the Tenant Based Rental Assistance program and will redirect HOME funds to other affordable housing projects and programs.

No.	Project	Goals Supported	Geographic Areas	Needs Addressed	Funding
1	Acquisition and Demolition of Blighted Properties	Eliminate Slum and Blight	County Wide		CDBG : \$140,000
	Description	Provides funds to participating communities to demolish blighted and/or condemned residential and commercial structures. This includes Spot Demolition, Urban Land Assistance Grants and projects with specific local governments as requested.			
	Target Date for Completion	02/28/2017			
	Estimate the number and type of families that will benefit from the proposed activities	To be determined (TBD) depending on projects selected			
	Location Description	TBD – depending on needs and which local governments apply for these funds			
	Planned Activities	Provides funds to participating communities to demolish blighted and/or condemned residential structures.			
2	Fair Housing Services	Further Fair Housing Provide Affordable Housing for Renters	County Wide - Local Target area	Increasing Affordable Housing	CDBG : \$85,000
	Description	Fair Housing Services will be provided by the region's fair housing nonprofit - Housing Opportunities Made Equal. This could include landlord/tenant counseling; training for landlords, real estate agents and local governments; county-wide marketing and advertising; quarterly meetings with other local governments; and legal action as needed.			
	Target Date for Completion	02/28/2017			
	Estimate the number and type of families that will benefit	75 households will benefit directly from services - all County residents benefit from furthering fair housing			

	from the proposed activities				
	Location Description	TBD			
	Planned Activities	Counseling, education, outreach and possible legal action			
	Housing Choice Voucher Mobility	Further Fair Housing Provide Affordable Housing for Renters		Increasing Affordable Housing	CDBG : \$30,000
3	Description	Educate and assist housing choice voucher holders to move to areas of low concentrations of poverty to increase economic opportunities.			
	Target Date for Completion	02/28/2017			
	Estimate the number and type of families that will benefit from the proposed activities	50 families will benefit			
	Location Description	TBD			
	Planned Activities	education, transportation, landlord searches, etc.			
	Public Facility Improvements	Improve Public Facilities	Participating Jurisdictions - Local Target area	Improving Public Facilities and Infrastructure	CDBG : \$700,000
4	Description	Make improvements to public facilities as requested by participating communities and approved by County Commissioners.			
	Target Date for Completion	02/28/2017			
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that 50,000 people will benefit			
	Location Description	County Wide			
	Planned Activities	Renovations or improvements to parks, parking lots and senior centers are planned.			

5	Public Infrastructure Improvements	Improve Public Infrastructure	Participating Jurisdictions - Local Target area	Improving Public Facilities and Infrastructure	CDBG : \$1,000,000
	Description	Make improvements to infrastructure as requested by participating jurisdictions and approve by County Commissioners.			
	Target Date for Completion	02/28/2017			
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that 50,000 people will benefit.			
	Location Description	TBD			
	Planned Activities	Improvements to streets, sidewalks, streetscapes, etc.			
6	Public Services	Improve Quality of Life	County Wide - Local Target area Participating Jurisdictions - Local Target area		CDBG : \$250,000
	Description	Provide various services to improve quality of life of residents in participating jurisdictions.			
	Target Date for Completion	02/28/2017			
	Estimate the number and type of families that will benefit from the proposed activities	We estimate that 50,000 people will be served			
	Location Description	TBD			
	Planned Activities	Emergency Medical Services, dental services, food assistance and activities for senior citizens will be provided.			
7	Homeowner Repairs and Improvements	Provide Affordable Housing for Homeowners	County Wide - Local Target area	Increasing Affordable Housing	CDBG : \$1,000,000
	Description	This includes CDBG housing repair services, water/sewer grant programs, and home repair grant/loan programs from various participating jurisdictions.			

	Target Date for Completion	02/28/2017			
	Estimate the number and type of families that will benefit from the proposed activities	600 families will be assisted			
	Location Description	TBD			
	Planned Activities	See description above.			
	Housing Development – CHDO Projects	Provide Affordable Housing for Renters		Increasing Affordable Housing	HOME : \$134,184
	Description	Provide at least 15% of HOME grant funds for housing development project(s) completed by a certified Community Housing Development Organization (CHDO).			
8	Target Date for Completion	02/28/2016			
	Estimate the number and type of families that will benefit from the proposed activities	2 to 4 low to very low income families will benefit			
	Location Description	TBD			
	Planned Activities	TBD			
	Other Housing Development Projects and/or Programs	Provide Affordable Housing for Homeowners Provide Affordable Housing for Renters		Increasing Affordable Housing	HOME : \$1,375,923
9	Description	These funds will be used with non-CHDO developers. Other housing development projects may include new construction or acquisition & rehabilitation for rental and/or homeowner housing units. Other housing development programs may include down payment assistance for homeowners.			
	Target Date for Completion	02/28/2016			
	Estimate the number and type	10 families will be assisted.			

	of families that will benefit from the proposed activities				
	Location Description	TBD			
	Planned Activities	See above			
	Renter Accessibility Modification Program	Further Fair Housing Provide Affordable Housing for Homeowners Provide Affordable Housing for Renters	County Wide - Local Target area	Increasing Affordable Housing	CDBG : \$50,000
10	Description	Provide accessibility improvements for residents who are disabled and renting their housing units. Up to \$7,500 can be provided per building for exterior and interior improvements.			
	Target Date for Completion	02/28/2017			
	Estimate the number and type of families that will benefit from the proposed activities	7 families will be assisted			
	Location Description	TBD			
	Planned Activities	See description			
	Homelessness Prevention and Rapid Rehousing	Serve Homeless Families and Reduce Homelessness	County Wide - Local Target area	Reducing Homelessness	ESG : \$236,000
11	Description	Provide homelessness prevention, shelter diversion and rapid rehousing services to residents in need.			
	Target Date for Completion	2/28/2017			
	Estimate the number and type of families that will benefit from the proposed activities	25 families will be assisted			
	Location Description	TBD			

	Planned Activities	See description			
	Services to Homeless Families	Serve Homeless Families and Reduce Homelessness		Reducing Homelessness	CDBG : \$62,000 HOME : \$125,000
	Description	Provide TBRA to homeless families to help then transition to self-sufficiency and provide facilitation of emergency shelters through the Continuum of Care.			
1	Target Date for Completion	02/28/2016			
2	Estimate the number and type of families that will benefit from the proposed activities	5000 individuals will receive emergency beds (HESG funding provided by City of Cincinnati) and 10 families will receive TBRA help.			
	Location Description	TBD			
	Planned Activities	See description			
	Economic Development Programs	Spur Economic Development	County Wide - Local Target area Participating Jurisdictions - Local Target area		CDBG : \$50,000
1	Description	Funds a small portion of services provided by HCDC to the County and participating jurisdictions.			
3	Target Date for Completion	02/28/2016			
	Estimate the number and type of families that will benefit from the proposed activities	TBD			
	Location Description	TBD			
	Planned Activities	Planning services, environmental review, corridor studies and administration of other economic development programs.			
1 4	Administration	Improve Quality of Life	County Wide - Local Target	Reducing Homelessness	CDBG : \$355,000

	Further Fair Housing Improve Public Facilities Improve Public Infrastructure Provide Affordable Housing for Homeowners Provide Affordable Housing for Renters Serve Homeless Families and Reduce Homelessness Spur Economic Development	area Participating Jurisdictions - Local Target area	Improving Public Facilities and Infrastructure Increasing Affordable Housing	HOME : \$89,456 ESG: \$19,349
Description	Administration of all HUD entitlement grants - CDBG, HOME and ESG. Also includes about \$20K in HESG admin resources.			
Target Date for Completion	02/28/2016			
Estimate the number and type of families that will benefit from the proposed activities	All families assisted are included in other programs.			
Location Description	County wide			
Planned Activities	Administration includes the following CDBG programs: Planning Admin, Community Development Admin, Economic Development Admin, Fair Housing Services, and Strategies to End Homelessness Admin. It also includes HOME Admin and ESG Admin.			

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

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

The Hamilton County Consolidated Plan jurisdiction includes 26 municipalities and 11 unincorporated townships. Geographically, the vast majority of Hamilton County communities participate in the CDBG program. Twelve out of 48 county jurisdictions are not participating in this plan.

Hamilton County covers a large geographic area with topography varying from steep hillsides to rolling farmland. The City of Cincinnati is by far the largest jurisdiction, with a population of approximately 300,000, and encompassing 80 square miles in the south-central portion of Hamilton County. The other cities, villages, and townships are dotted across the county following rivers, natural topography, and major roads reaching into suburban areas. More than some other urban areas in Ohio, Cincinnati is virtually surrounded by smaller jurisdictions – some with less than 1,000 residents. Although many of them are small, the residents and leaders of these communities take pride in where they live and are historically fiercely independent of one another.

This fragmented geography makes coordinated, county-wide planning and program execution extremely challenging. However, over the past several years leaders in many of these smaller communities have begun cooperative agreements with Hamilton County, civic organizations, and one another to deal with cross-jurisdiction issues and service sharing.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
County Wide	100

**Table 4 - Geographic Distribution**

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

Historically, approximately 50% of our CBDG funds are distributed to each of the participating jurisdictions and the remaining 50% is allocated to county-wide programs and projects. Low-moderate income communities are given priority because of their increased need. The following communities are considered low-mod: Addyston, Arlington Heights, Cheviot, Elmwood Place, Golf Manor, Lincoln Heights, Lockland, Norwood, and Silverton. Because each participating community is most familiar with their needs, the County allows them to determine where and how funds should be allocated within their respective jurisdiction. Communities submitted proposed projects for review and approval.

## Affordable Housing

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

#### Introduction

As in years past, the County will invest almost 25% of our CDBG funds to assist low and extremely low income homeowners with emergency and critical repairs. Some local governments will also administer home improvement repair grant funding to their low and moderate income homeowners. We will also use CDBG funds to modify rental units for persons with physical disabilities.

In 2016, we will be phasing out the Tenant Based Rental Assistance program using 2015 HOME funds. This will allow us to use HOME funds for housing development projects and programs. We will work with CHDO and non-CHDO developers. Projects may include acquisition and rehabilitation of multi-family housing; acquisition and rehab of single family homes; and/or new construction of multi-family housing. We anticipate meeting the needs identified in the 2015-2019 Consolidated Plan which includes these populations: seniors, veterans, people experience homelessness, and persons with disabilities. We will also consider housing needs for persons returning from prisons and jails and persons dealing with addiction. The numbers below account for new housing units only.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	20
Special-Needs	10
Total	30

**Table 5 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	10
Rehab of Existing Units	20
Acquisition of Existing Units	10
Total	30

**Table 6 - One Year Goals for Affordable Housing by Support Type**

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

### **Introduction**

The Cincinnati Metropolitan Housing Authority was established in 1933 under the provisions of the Ohio Housing Authority Law and is an asset to Hamilton County. For more than 80 years the agency has provided quality, affordable rental housing opportunities for individuals and families throughout the county. The agency operates or administers three separate programs. Asset Management consists of 5,307 units owned and managed by CMHA. The Housing Choice Voucher can administer Housing Assistance Payments for nearly 11,338 households. The agency also operates 274 units of other affordable rental housing. CMHA has created a Gold Performance Standard to ensure that the resources CMHA provides are meeting the needs of the residents of Hamilton County.

CMHA has applied for Moving to Work (MTW) designation through Congressional Appropriations where feasible. Once it has been received, CMHA will have a community advisory group on the planning of the MTW framework, as it would benefit the entire community. At this time, the current Mayor of Cincinnati has agreed to co-chair a MTW advisory group.

CMHA's newest development is West Union Square in Colerain Township. This new construction facility will include 70 affordable units for residents 55 and older. This project will begin construction in early 2016.

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

The Annual Goals identified by CMHA in Fiscal Year 2015:

- Obtain High Performer status in the Asset Management and Voucher Management (This is called Housing Choice Voucher above) Programs (PHAS and SEMAP).
- Concentrate on efforts to improve specific management functions.
- Continue to train staff concerning on SEMAP, PHAS, and other HUD regulations.
- Implement the use of handheld devices for the Asset Management Department.
- Continue to explore rent collection options utilizing emerging technologies to explore partnerships
- Partner with Community Based Organizations and state agencies to collaborate on financial goals for our families.
- Utilize Six Sigma process to streamline and gain efficiency throughout the organization.
- Update admission policies to incorporate community needs.
- Continue to provide training to staff and Board Commissioners relative to any new or revised policy or procedure mandated by HUD.
- Improve internal and external communications.
- Explore avenues to generate diverse revenue streams.

- Continue to increase participation in the HCV Family Self-sufficiency Program.
- Continue to recruit new property owners for the HCV Program.
- Work toward obtaining achieving the de-concentration bonus point in SEMAP.
- Dispose of single family home portfolio through sale to clients, demolition, and donation
- Replace some of the units in communities that are conducive to families becoming self-sufficient.
- Develop a 5H program with existing single family homes.
- Assess, renovate or modernize asset management units.
- CMHA will assess its property portfolio to determine which CMHA properties and/ or buildings are good candidates for the Rental Assistance Demonstration (RAD).

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

CMHA is the public housing authority within Hamilton County that operates and manages all public housing units within the jurisdiction. CMHA has a strong resident organization called J-RAB (Jurisdiction-Wide Resident Advisory Board) that serves as the voice of public housing residents. This organization meets monthly, attends every Board meeting, and has annual empowerment conferences, among a variety of other activities.

According to CMHA’s 2015 Annual Report, CMHA currently does not have a homeownership program for public housing residents, but intends to apply for one in the near future. However, CMHA has a Housing Choice Voucher Homeownership Program that permits eligible participants in the HCV program the option of purchasing a home with their HCV assistance, called Family Self Sufficiency. To date, staff has assisted in 64 homeownership closings. CMHA has a Resident Services Team that provides helpful opportunities for public housing residents seeking employment. According to CMHA’s 2013 Report to the Community,

*“CMHA has partnered with area companies to provide new employment opportunities for residents through initiatives developed by its Resident Services Team. CMHA works with local human resources directors to arrange hiring events tailored specifically to CMHA client’ strengths and skill sets. This is a way to give people a hand up and put them on a path towards self-sufficiency.”*

Employment is a big step towards eventually having a chance at homeownership. Additionally, CMHA has a Housing Choice Voucher Homeownership Program that permits eligible participants in the HCV program the option of purchasing a home with their HCV assistance, called Family Self Sufficiency. To date, staff has assisted in 64 homeownership closings. However, this program is only available to HCV participants and not public housing residents.

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

CMHA is not designated as troubled.

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

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

Our Continuum of Care, Strategies to End Homelessness (STEH), leads the coordinated community effort to end homelessness in Greater Cincinnati. STEH is implementing a Coordinated Entry system in 2016 that will prioritize homeless clients for housing. All homeless people on the streets and in shelter will be assessed to determine which type of housing is most appropriate. Client referrals to Permanent Supportive Housing, Rapid Re-housing, and Transitional Housing will be made based on the assessment thus matching a client with the program where he/she will find the most success. This system will also enable the community to see where the housing gaps are that will enable us to better serve the homeless population. Coordinated entry matched with the shelter and housing options available in Cincinnati will move us towards the direction of ending homelessness in Cincinnati.

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

The Homeless Outreach Group is a group of street outreach providers who meet monthly to discuss best practices and progress in engaging unsheltered homeless people in services. Representatives from all street outreach programs, other programs that serve unsheltered homeless people, the Cincinnati Police, and the Hamilton County Sheriff's departments attend.

Currently there are four agencies (five programs), providing outreach services to those who are living on the street:

- Lighthouse Youth Services targets homeless youth
- Greater Cincinnati Behavioral Health's PATH Team targets the homeless suffering from mental illness
- Greater Cincinnati Behavioral Health's Paths to Recovery Team targets homeless chronic public inebriates
- Block-by-Block works specifically with the homeless living in downtown Cincinnati
- Cincinnati Union Bethel's Off the Streets Program targets women engaged in prostitution.

As described above, the Continuum of Care, STEH, will begin the coordinated entry system in January of 2016 which will enable case managers to assess every sheltered and unsheltered client for their housing needs. The assessments will prioritize the appropriate people for housing openings and enable the CoC to analyze housing gaps in the community. The CoC also started 2 new Permanent Supportive Housing projects in 2015 and applied for additional Permanent Housing units in the FY2015 CoC application. All Permanent Housing projects follow a "Housing First" model which means there are very few barriers that would exclude someone from being entered into a program as well as a high threshold of intervention prior to terminating a client from a program. The housing first model allows clients to

address issues that may have lead to homelessness while they are stably housed instead of trying to fix all of the barriers before entering housing.

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

All of the following actions are being taken to improve services to people currently on the streets and in shelters, particularly the chronically homeless and homeless families.

1. Homeless to Homes Shelter Collaborative (HTHSC): The 2008 Homeless to Homes plan called for a reconfiguration of shelters beds for homeless individuals in our emergency shelter system. The HTHSC is a group of four shelter providers who collaborated to raise capital funds to build five new facilities and operating funds to provide improved case management and day services. Lighthouse opened the Sheakley Center for Youth to provide 28 beds of emergency shelter to homeless youth ages 18-24. Talbert House opened the Parkway Center with 60 beds to serve homeless men with substance abuse barriers. City Gospel Mission increased their capacity to 74 beds in their new building to serve homeless men in a faith based facility. And Shelterhouse (formerly known as the Drop Inn Center) separated their one homeless facility that housed men and women into two facilities, separating the men and women. The final shelter opening happened in October of 2015 and all of the programs provide a vast array of services specific to the homeless population that they serve. The new shelter configuration, paired with Coordinated Entry, should enable our community to see a decline in the length of time clients are residing in emergency shelter.
2. Indigent Care Levy: STEH, on behalf of the HTHSC, submitted an RFP in 2015 to receive an increase in funding for Homeless Medical Healthcare Services via the Hamilton County Indigent Care Levy. Operating funds were awarded to the HTHSC for 2015-2017. Levy funding is used to cover costs associated with increase case management and day services which includes substantial changes to the medical services provided in emergency shelters. All of the facilities receiving this funding provide medical services in shelter that range from a community health clinic to a full time registered nurse on staff to a medical kiosk where clients can virtually talk to doctors.
3. Family Homelessness Study: The Solutions for Family Homelessness plan was published in October of 2015. Strategies to End Homelessness (STEh), the Society of St. Vincent de Paul and the Family Housing Partnership (Bethany House Services, Interfaith Hospitality Network of Greater Cincinnati, The Salvation Army, and the YWCA of Greater Cincinnati) led the development of the Plan to identify how our community can proactively address the needs of families experiencing homelessness. The recommendations in the plan are focused in four key areas: Prevention, Capacity Building, Policy Change and Housing. The creators of the plan are currently working on defining an implementation schedule.
4. Winter Shelter: For the last four years, local organizations have partnered to add seasonal Winter Shelter beds to the local emergency shelter system to ensure that anyone who is homeless and on the streets has access to a safe, warm place to sleep during the coldest months of the year, normally mid-December through February. Prior to 2011, seasonal shelter was

provided to homeless people only on nights when the temperature dipped below 10 degrees Fahrenheit. Since 2011, Winter Shelter capacity has been reliable and adequate, making improvements to assist people out of homelessness, not just warehouse them in homelessness. Previously the additional shelter capacity was located at a church and this season, the winter shelter is located in the basement of Shelterhouse's Barron Center for Men. This space was specifically designed to serve this seasonal capacity and can sleep up to 200 people. The winter shelter has a separate entrance from the main emergency shelter but because of the close proximity, as well as the fact that the winter shelter is staffed with trained Shelterhouse staff, winter shelter clients have easy access to receive case management services.

5. Cross-systems Collaboration: In order to reduce and then end homelessness locally, it is necessary to continue to strengthen collaborations between the homeless services system and systems working with mental health, development disabilities, immigrants and undocumented persons, persons with limited English proficiency, persons exiting the justice system, substance abuse treatment, foster care, and serving LGBTQ households as self-identified.

**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**

1. Rapid Re-Housing (RRH) is a nationally recognized best practice for quickly ending episodes of homelessness in a cost efficient and effective way. RRH has become a high priority in our community: 15 RRH programs funded by the Continuum of Care, State of Ohio Housing Crisis Response Program (HCRP) and ESG funding support RRH for families and individuals. Talbert House and Goodwill Industries are receiving Supportive Services for Veteran Families (SSVF) funding to implement programs which rapidly transitioning Veterans and their families that are experiencing homelessness back into permanent housing.
2. Permanent Supportive Housing: Expanded PSH options: PSH is a nationally recognized best-practice for meeting the needs of disabled homeless people. With 84% of our local homeless population having at least one disabling condition the continued expansion of PSH options will continue to be necessary. The CoC has defined PSH prioritization in alignment with Section III.A HUD's notice CPD 14-012 for prioritizing the Chronically Homelessness. The CoC continues to add PSH housing stock to the community with two new PSH projects opening in December 2015 as well as including 4 new PSH projects in the FY15 CoC application.

3. Coordination of Housing Resources: the following are all high-priority strategies geared toward making better, more strategic use of housing resources-Coordinated Assessment: in 2016, the CoC will begin implementation of a Coordinated Entry system that will ensure that homeless individuals and families are referred to the housing program that best meets their needs and can quickly become stably housed. Housing the chronically homeless remains a high priority in our community. Affordable housing: available resources and funding should be used to incentivize the development and preservation of high-quality, accessible, low-income housing. In addition, existing affordable housing resources (PHA, HOME, etc.) should be used to return households to housing, and ensure they do not return to homelessness. For the first time in our community, Cincinnati Metropolitan Housing Association has set-aside a preference for homeless individuals and families in the Housing Choice Voucher program. Strategies to End Homelessness and the CoC Permanent Supportive Housing workgroup are leading the process to ensure that appropriate referrals are made to CMHA. The top priority for CMHA referrals are clients who are currently in a CoC funded Permanent Supportive Housing program who need a long term housing subsidy but are stabilized in services.

**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**

Prior to 2009, homelessness prevention resources were largely absent in the community due to a lack of availability of funding for such activities. However, under the American Recovery and Re-investment Act (ARRA), stimulus funding was made available for homelessness prevention. Stimulus funding expired in 2012 but the following activities are ongoing:

1. Shelter Diversion: ESG and United Way funding are being used to divert households at imminent risk of entering shelter back into housing and services. The Shelter Diversion program is being run in a partnership including the City of Cincinnati, Hamilton County, United Way of Greater Cincinnati, Strategies to End Homelessness, and seven continuum partner agencies. Risk factors considered for inclusion in this program include a prior history of homelessness, if a household has already lost its own housing and is relying on others for a place to stay (doubled-up), and immediacy of need for shelter placement.

2. Supportive Services for Homeless Veterans and their Families (SSVF): Talbert House and Goodwill Industries have been awarded SSVF funding to implement programming which prevents homelessness for veterans and their families.
3. Youth Aging out of Foster Care: A U.S. Dept. of Health and Human Services (HHS) funded effort is currently underway, led by Lighthouse Youth Services, targeted toward preventing homelessness among youth who have been in the Foster Care system. This effort will support enhanced identification, data collection and services to youth formerly in the foster care system. As we know that one-third of youth aging out of foster care experience homelessness. National studies have also shown that between 21% and 53% of youth experiencing homelessness were at one time placed in the foster care system. A recent HMIS revision to includes gathering data about past and current foster care placements as risk factors to homelessness and reconnecting to prior custodial agency (HCJFS), Foster Care Agency, or Independent Living Program for possible aftercare intervention. The Initial planning phase of the grant is over and Lighthouse has moved into the implementation around creating a system of care that best serves these at risk youth. Data sharing agreements have been secured with main partners and new evidenced based programming is in the start-up phases. Additionally, there is significant involvement in advocacy around the Foster Care to 21 initiatives and at this point it has cleared the House and was sent to the Senate for review. This would increase the age from 18 to 21 where foster youth could get services. And, CMHA has awarded 30 housing choice vouchers giving preference to youth 18-24 who have emancipated from the foster care system. The initial vouchers start January 1, 2016 with the possibility of renewal during the next fiscal year.
4. LGBTQ Youth Homelessness Prevention Initiative: Cincinnati/Hamilton County is one of only two communities in the country selected to participate in a national technical assistance initiative which will plan and implementation strategies for preventing LGBTQ youth from becoming homeless. This initiative is being led locally by Lighthouse Youth Services and Strategies to End Homelessness, and being conducted in cooperation with HUD, HHS, Dept. of Justice, Dept. of Education, and USICH.

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

**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**

A summary of the 2014 Analysis of Impediments results are outlined below:

1. Lack of public transportation in opportunity areas
2. Zoning and building code barriers
3. Affordable housing is concentrated in racially segregated areas.
4. Barriers to mobility of families with vouchers
5. Barriers for immigrant populations
6. Barriers to African American Homeownership
7. Barriers to housing choice for people with disabilities

In the coming year, the County plans to implement the following actions:

1. Lack of transportation options in opportunity areas was identified as an impediment to housing choice, so in 2016, the County will meet with SORTA (Southwest Ohio Regional Transit Authority) to learn more about the Go Forward Plan. The County will research and analyze the plan to determine what actions can be taken to increase public transportation in additional communities.
2. County staff will work with HOME to determine the specific jurisdictions where zoning issues are problematic and develop a plan of action to remedy this situation.
3. The County will be using HOME funds to develop new affordable housing outside of the City of Cincinnati which will help to deconcentrate affordable housing in racially segregated areas.
4. County is working with CMHA to transition over 90% of clients from TBRA/TBA programs to the HCV program during 2016.
5. To make our department more accessible, the County will research options for adding Spanish language services to our phone lines.
6. County staff will research existing homeowner education services to determine where the needs for future services.
7. The County increased funding levels for its renter accessibility modification program, which provides assistance to low and moderate income renters to make accessibility improvements to their housing units. This prevents tenants from being forced to relocate to units that can meet their needs. We

also added the flexibility to the program to make interior improvements as well as exterior improvements.

8. The County will be using HOME funds to develop new affordable housing specifically targeted for persons with disabilities.

See Attachment C, Analysis of Impediments to Fair Housing and updated 2015-2019 Action Plan for the additional details.

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

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

The largest obstacle the County is facing is a lack of housing developments to meet the needs of special populations, including elderly and disabled residents. To combat this obstacle, for the first time the County is providing funds to the Housing Network of Hamilton County to acquire and rehab a multi-family home, specifically for disabled low-income persons.

Moving forward, the County has met with a variety of entities to discuss how to leverage our HUD funds to meet the needs of various special populations. These groups include:

- The County Office of Reentry has housing needs for persons returning to the community from prisons and jails. This may include transitional housing with a path to homeownership with Habitat for Humanity.
- The County has recently created a Heroin Task Force and there is a quickly growing need for transitional housing for persons battling addiction.
- Excel Development is a nonprofit who provides housing and supportive needs to the mentally ill.
- Volunteers of America recently built a residential facility for Veterans in Mt. Healthy and there is already a long waiting list for females in this housing. They are exploring options for female only veterans housing in the County.
- Habitat for Humanity has a great model to provide homeownership to deserving families. We have worked with them in the past with acquisition/rehab to blend into existing neighborhoods.
- Model Management and Episcopal Retirement Homes are exploring mixed use and mixed housing for elderly, persons with developmental disabilities and family members of persons with developmental disabilities in one subdivision.

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

See above comments

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

The County provides literature regarding lead-based paint to all of our clients.

Any residential unit built prior to 1978 that receives funding through HUD must conduct a lead risk assessment, remediation plan if necessary, and lead clearance testing by appropriately certified professionals. Through our housing repair services provided to low income residents in the community, our partners follow all lead-safe practices while working in the residential units.

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

Greater Cincinnati as a whole is focusing on housing, education, and job training efforts to reduce poverty in Greater Cincinnati. Historically, Hamilton County has focused on meeting the housing needs of its low-income residents. Moving forward, we intend to research and implement a variety of programs to address these other pertinent needs.

In addition to the County providing some HUD funds to providers of homeless services, the Hamilton County Administrator utilized \$1.4 million of the Indigent Care levy funds go toward coordinated homeless health care in 2015. The levy provides case management services, daytime healthcare services and programming, direct client charges and facility operating expenses for the five new shelters in Cincinnati. This care is provided through a contract with Strategies to End Homelessness.

Currently there is a large push to implement Preschool Promise in Cincinnati. Research has shown if we want to improve outcomes for generations, fix our talent pipeline, strengthen our schools and communities, and produce long-term, meaningful savings to taxpayers, we have to invest in quality preschool for all of our children. The Cincinnati Preschool Promise will provide tuition credits for every child, regardless of income, to attend high quality preschool for up to two years before beginning kindergarten. This initiative is expected to be on the ballot in 2016. Additionally, Strive Partnership is working to improve academic success in the urban core of Greater Cincinnati by creating a partnership of More than 300 cross-sector representatives, including school district superintendents, early-childhood educators, non-profit practitioners, business leaders, community and corporate funders, city officials, and university presidents.

In the future, we plan to research various job training programs and supportive services to make a greater impact on our residents and reduce poverty.

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

Hamilton County is currently working to strengthen our relationship with HCDC, Inc. This organization helps build businesses and promote job creation in 3 simple ways: businesses incubation, business lending, and economic development services. We hope to coordinate various funds and grants to make more impactful development strategies moving forward.

We have been meeting with many of our jurisdictions, both participating and non-participating, to build stronger relationships with these communities and to educate them on the possible uses of HUD funds. Our goal is to increase communication not only within the County, but between the jurisdictions and to share resources. We like to work with our local communities, connect them to various resources and be strategic with our spending.

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

Hamilton County will continue to work toward enhancing coordination between housing providers and service agencies. The list below provides a description of the activities that are currently being undertaken and will continue in the future:

- Hamilton County works with the Housing Network of Hamilton County to provide quality, affordable, accessible homes for people with disabilities to support them as valued members of our community. They will be purchasing a multi-family home in Green Township to rehabilitate and make accessible for residents in 2016.
- Hamilton County works with Excel Development, an organization that provides housing and housing assistance to persons with mental disabilities. We anticipate completing a housing assistance project with them in 2016.
- Hamilton County, the City of Cincinnati, and CMHA continue to work together on fair housing issues, specifically the draft of an Analysis of Impediments to Fair Housing.
- Hamilton County provides funding to Housing Opportunities Made Equal, a non-profit agency that coordinates with CMHA for the implementation of a Mobility Program for persons receiving Housing Choice Vouchers.
- Ohio Valley Goodwill is a service agency the County funds to provide assistance to low income families; Goodwill partners with various private and governmental service agencies for client referrals.
- The local Continuum of Care collaborative applicant, Strategies to End Homelessness (STEh), coordinates the efforts of organizations which provide services to the homeless and other special populations.
- Hamilton County coordinates with various organizations that serve the disabled population to receive referrals for clients that need mobility improvements made to their homes.

## Program Specific Requirements

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

#### Introduction:

Hamilton County's program specific requirements for CDBG, HOME, ESG and HOPWA are listed below. The County typically exceeds the required 70% of use of CDBG funds for low and moderate income benefit. Slum and blight removal usually averages no more than 10 - 15% of the annual grant amount. It is not anticipated that any CDBG funds will be used for urgent need.

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

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

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

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

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	85.00%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

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

None. All activities are as listed in Section 92.205.

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

The County utilizes the recapture provision for all assistance to homebuyers. Depending on the length of the period of affordability, a percentage of the assistance is forgiven each year until there is no balance remaining. As an example, assistance provided requiring a 5 year period of affordability would be forgiven at a rate of 20% per year.

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

Hamilton County will use the HOME Program guidelines as a minimum in determining the period of affordability for NSP funds. Funding provided per rental or homeownership unit <\$15,000 will have a 5 year period of affordability, funding provided between \$15,000-\$40,000 per unit will have a 10 year period of affordability, and funding >\$40,000 per unit will have a 15 year period of affordability.

New construction rental projects will have a 20 year period of affordability, regardless of amount of subsidy, as required by the HOME regulations.

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

Hamilton County will not use HOME funds for this purpose.

**Emergency Solutions Grant (ESG)  
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)  
In order for Strategies to End Homelessness (our CoC lead agency) to receive Emergency Solutions Grant funds, the County requires that any agencies receiving ESG funds be monitored and in compliance with the Emergency Shelter Program regulations. Staff at Strategies to End Homelessness (STEH) must monitor all agencies annually for compliance.
  
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.  
Cincinnati and Hamilton County utilize a Central Access Point (CAP). CAP currently screens and schedules intakes for the four family shelters, a shelter for 18-24 year old individuals, a single men's shelter, and a transitional housing program for single men with substance abuse issues. CAP also refers to a Shelter Diversion program, a case management program, to help individuals avoid entering shelter. Everyone who calls CAP is screened in the same manner to determine which program is best suited the caller's needs. The caller is finally referred to the appropriate program and contacts the agency directly to complete their intake.
  
3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).  
Annually, Strategies to End Homelessness prepares an Emergency Solutions Grant application for funding. The application is sent via email to the prior year's providers and posted on the STEH website for any other applicants interested in applying. Agencies with interest in applying must be active in the community's HMIS, VESTA and have the prior year data available before the allocation process begins. The Emergency Solutions Grant allocation process is an inclusive process of the ESG provider network. Providers gather annually to review the needs within the community and to allocate funds.  
As defined in the CoC's Governance Charter, membership is determined by fully participating in the most recent Large Group Scoring Process. The Large Group Scoring Process took place in July 2014 by the Homeless Clearinghouse. All nonprofits participating in the 2014 CoC Competition to submit some basic program information to be made available to all Large Group scoring attendees in

advance of the Large Group Scoring event. This information was submitted by each of the programs up for renewal, categorized by program type, and was shared in advance of the Large Group Scoring Event. The programs addressed one of the following four needs:

- Permanent Supportive Housing Programs
- Rapid Re-Housing Programs
- Services Only Programs
- Transitional Housing Programs

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

STEH meets the homeless participation requirement outlined in 24 CFR 576.405(a). All sub-recipients are in compliance and have at least one board member representing the homeless or formerly homeless.

5. Describe performance standards for evaluating ESG.

Performance measures are included in the allocation process for Emergency Solutions Grant funding. STEH uses data collected in VESTA to determine a starting point allocation for each eligible provider. The starting point allocation divides the funding based on outcomes related specifically to increased income and positive housing results. A full year's data is used from the prior operating year.

**Appendix A: 2016 Annual Action Plan by Grant, Community and Programs & Projects**

<b>Grant</b>	<b>Community</b>	<b>Project/Program</b>	<b>2016 Budget</b>
CDBG	Anderson Township	Acquisition and Demolition	50,000
CDBG	Cheviot	Francis Avenue Rehabilitation	150,000
CDBG	Cleves	Street Improvements	50,000
CDBG	Deer Park	O'Leary Street Improvements	85,000
CDBG	Delhi Township	Senior Center Parking Improvements	175,000
CDBG	Forest Park	Kanter Park Improvements	30,000
CDBG	Golf Manor	Home Improvement Repair Program	15,000
CDBG	Greenhills	Home Improvement Repair Program	20,000
CDBG	Harrison	Senior Center Roof	75,000
CDBG	Harrison Township	Senior Center Roof	75,000
CDBG	Lincoln Heights	EMS Staffing	31,000
CDBG	Miami Township	Senior Center Parking Improvements	75,000
CDBG	Mt. Healthy	Acquisition and Demolition	20,000
CDBG	North Bend	Presidential Park Improvements	30,000
CDBG	Norwood	Streets/Curbs/Sidewalk Improvements	100,000
CDBG	Norwood	Streetscape Improvements	25,000
CDBG	Norwood	Youth Dental Program	10,000
CDBG	Sharonville	Gower Park ADA Improvements	68,000
CDBG	Springdale	Home Improvement Repair Program	15,000
CDBG	Springfield Township	West College Hill Neighborhood Services	68,000
CDBG	Whitewater Township	Senior Center Improvements	109,000
CDBG	Woodlawn	Pedestrian Bridge Reconstruction	100,000
CDBG	Wyoming	Civic Center Accessibility Upgrades	<u>127,000</u>
<b>Total Community Specific Projects &amp; Programs</b>			<b>1,503,000</b>
<b>Grant</b>	<b>Agency</b>	<b>Project/Program</b>	<b>2016 Budget</b>
CDBG	Freestore Foodbank	Emergency Food Services	100,000
CDBG	H.O.M.E.	Fair Housing	85,000
CDBG	H.O.M.E.	HCV Mobility Program	30,000
CDBG	Ham. Co. Planning & Dev.	Administration	285,000
CDBG	Ham. Co. Planning & Dev.	Planning / Mini-Grants	70,000
CDBG	Ham. Co. Planning & Dev.	Rental Accessibility Modifications	50,000
CDBG	Ham. Co. Planning & Dev.	Spot Demolition	25,000
CDBG	Ham. Co. Planning & Dev.	Water/Sewer Grant Program	25,000
CDBG	HCDC	Economic Development & Admin	50,000
CDBG	HCDC	Urban Land Assistance Program	45,000
CDBG	Ohio Valley Goodwill	Homeless Reintegration Project	60,000
CDBG	People Working Cooperatively	Home Repair Program	700,000
CDBG	Strategies to End Homelessness	Homeless Services Administration	<u>62,000</u>
<b>Total Community Wide Programs</b>			<b>1,587,000</b>



**Appendix B: 2016 Annual Action Plan by Goals, Programs and Projects**

<b>Grant</b>	<b>Goal</b>	<b>Program</b>	<b>Community</b>	<b>Project/Program</b>	<b>2016 Budget</b>	<b>Outcome</b>	<b># of Units</b>
CDBG	ALL Goals	Administration	Ham. Co. Planning & Dev.	Administration	285,000	N/A	N/A
CDBG	ALL Goals	Administration	Ham. Co. Planning & Dev.	Planning / Mini-Grants	70,000	N/A	N/A
HOME	ALL Goals	Administration	Administration	Ham. Co. Planning & Dev.	89,456	N/A	N/A
CDBG	Eliminate Slum and Blight	Acquisition/Demolition	Anderson Township	Acquisition and Demolition	50,000	Buildings	5
CDBG	Eliminate Slum and Blight	Acquisition/Demolition	Mt. Healthy	Acquisition and Demolition	20,000	Buildings	2
CDBG	Eliminate Slum and Blight	Acquisition/Demolition	Ham. Co. Planning & Dev.	Spot Demolition	25,000	Buildings	2.5
CDBG	Eliminate Slum and Blight	Acquisition/Demolition	HCDC	Urban Land Assistance Program	45,000	Buildings	4.5
CDBG	Further Fair Housing	Fair Housing	H.O.M.E.	Fair Housing	85,000	Households	75
CDBG	Further Fair Housing	HCV Mobility Program	H.O.M.E.	HCV Mobility Program	30,000	Households	50
ESG	Further Fair Housing	Services to Homeless Families	Strategies to End Homelessness	Administration	19,349	N/A	N/A
CDBG	Improve Public Facilities	Public Facility Improvements	Wyoming	Civic Center Accessibility Upgrades	127,000	Facility	1
CDBG	Improve Public Facilities	Public Facility Improvements	Sharonville	Gower Park ADA Improvements	68,000	Facility	1
CDBG	Improve Public Facilities	Public Facility Improvements	Forest Park	Kanter Park Improvements	30,000	Facility	1
CDBG	Improve Public Facilities	Public Facility Improvements	Woodlawn	Pedestrian Bridge Reconstruction	100,000	Facility	1
CDBG	Improve Public Facilities	Public Facility Improvements	North Bend	Presidential Park Improvements	30,000	Facility	1
CDBG	Improve Public Facilities	Public Facility Improvements	Whitewater Township	Senior Center Improvements	109,000	Facility	1
CDBG	Improve Public Facilities	Public Facility Improvements	Delhi Township	Senior Center Parking Improvements	175,000	Facility	1
CDBG	Improve Public Facilities	Public Facility Improvements	Miami Township	Senior Center Parking Improvements	75,000	Facility	1
CDBG	Improve Public Facilities	Public Facility Improvements	Harrison	Senior Center Roof	75,000	Facility	1
CDBG	Improve Public Facilities	Public Facility Improvements	Harrison	Senior Center Roof	75,000	Facility	1
CDBG	Improve Public Infrastructure	Public Infrastructure Improvements	Cheviot	Francis Avenue Rehabilitation	150,000	People	200
CDBG	Improve Public Infrastructure	Public Infrastructure Improvements	Deer Park	O'Leary Street Improvements	85,000	People	200

**Appendix B: 2016 Annual Action Plan by Goals, Programs and Projects**

CDBG	Improve Public Infrastructure	Public Infrastructure Improvements	Cleves	Street Improvements	50,000	People	200
CDBG	Improve Public Infrastructure	Public Infrastructure Improvements	Norwood	Streets/Curbs/Sidewalk Improvements	100,000	People	1000
CDBG	Improve Public Infrastructure	Public Infrastructure Improvements	Norwood	Streetscape Improvements	25,000	People	100
CDBG	Improve Quality of Life	Public Services	Freestore Foodbank	Emergency Food Services	100,000	People	20000
CDBG	Improve Quality of Life	Public Services	Lincoln Heights	EMS Staffing	31,000	People	3400
CDBG	Improve Quality of Life	Public Services	Springfield Township	West College Hill Neighborhood Services	68,000	People	700
CDBG	Improve Quality of Life	Public Services	Norwood	Youth Dental Program	10,000	People	300
CDBG	Provide Affordable Housing for Homeowners	Homeowner Repairs and Improvements	Golf Manor	Home Improvement Repair Program	15,000	Homeowner Units	15
CDBG	Provide Affordable Housing for Homeowners	Homeowner Repairs and Improvements	Greenhills	Home Improvement Repair Program	20,000	Homeowner Units	20
CDBG	Provide Affordable Housing for Homeowners	Homeowner Repairs and Improvements	Springdale	Home Improvement Repair Program	15,000	Homeowner Units	15
CDBG	Provide Affordable Housing for Homeowners	Homeowner Repairs and Improvements	People Working Cooperatively	Home Repair Program	700,000	Homeowner Units	600
CDBG	Provide Affordable Housing for Homeowners	Homeowner Repairs and Improvements	Ham. Co. Planning & Dev.	Water/Sewer Grant Program	25,000	Homeowner Units	3
HOME	Provide Affordable Housing for Renters	Housing Development	Housing Development Projects & Programs	Ham. Co. Planning & Dev.	1,375,923	Housing Units	20
HOME	Provide Affordable Housing for Renters	Housing Development	Housing Development - CHDO Projects	Ham. Co. Planning & Dev.	134,184	Housing Units	2
CDBG	Provide Affordable Housing for Renters	Housing Mobility Improvements	Ham. Co. Planning & Dev.	Rental Accessibility Modifications	50,000	Housing Units	7
CDBG	Serve Homeless Families and Reduce Homelessness	Administration	Strategies to End Homelessness	Homeless Services Administration	62,000	N/A	N/A
ESG	Serve Homeless Families and Reduce Homelessness	Homelessness Prevention	Strategies to End Homelessness	Rapid Rehousing	238,638	Households	30
CDBG	Serve Homeless Families and Reduce Homelessness	Services to Homeless Families	Ohio Valley Goodwill	Homeless Reintegration Project	60,000	Households	60
CDBG	Spur Economic Development	Economic Development	HCDC	Economic Development & Admin	50,000	Businesses	10

## 2014 Analysis of Impediments to Fair Housing and 2015-2019 AI Action Plan

This section lists impediments to fair housing choice in Cincinnati and Hamilton County and makes recommendations on steps that can be taken to address the impediments. The conclusions in this section are based on data and information from previous sections and on the focus groups and interviews described in the Methodology section.

### 1. Lack of public transportation in opportunity areas

Every focus group said that the major impediment to housing choice was lack of public transportation in opportunity areas. As one participant said, “It really comes down to transportation and affordable housing.”

The bus system is operated by the Southwest Ohio Regional Transit Authority. SORTA, an independent political subdivision of the State of Ohio, operates Metro fixed-route bus service and Access paratransit service for people with disabilities. SORTA is governed by a 13-member board of trustees, 7 appointed by the City of Cincinnati and 6 appointed by Hamilton County. Hamilton County appoints 3 of its own trustees plus 1 each representing Butler, Clermont and Warren counties. Public funding for the system comes primarily from an earnings tax paid by those who live or work in the City. In conversation about the Analysis of Impediments, SORTA management said they would like to expand the system. They have developed a Go Forward Plan with extensive community input that shows where they would expand when funding is available. These plans would expand service into areas where housing choice is currently limited because of lack of public transportation.

***Recommendation 1.0:*** Support implementation of the SORTA Go Forward Plan. Encourage county jurisdictions to work with SORTA on increasing public transportation service in their communities.

**2015 Action Plan:** City and County staff will meet with SORTA to learn more about the Go Forward Plan. They also will review and analyze the plan to determine what actions could be taken to increase public transportation service in additional communities.

**2016 Action Plan:** Minimal action was taken on this issue in 2015. Some routes were extended to reach employment centers outside of the City including Green Township and Springdale. City, County and CMHA staff have all turned over during 2015. County staff will ensure that this will occur in 2016 for routes outside of the City.

### 2. Zoning and building code barriers

Zoning codes are an impediment to housing choice when they make it difficult to locate group homes or affordable housing. Some jurisdictions in the County limit multi-family housing and have minimum square footage requirements for single-family homes. Others have not been updated since the 1960s, and according to the County Planning Director, could be in violation of the fair housing laws. Many of the communities are financially strapped and currently experience little development, so the communities don't see the need for planning/zoning updates.

## **2.1 Zoning codes restrict the siting of group homes.**

In the last several years there have been several controversies about the siting of group homes. As part of the settlement of a 2013 fair housing case in Federal Court brought by the owner of a group home for adults with dementia, the City of Montgomery agreed to review and rewrite its zoning code in accordance with fair housing law.

Most recently Cincinnati opposed sober living houses in the Price Hill neighborhood. While in that case there were issues of whether the homes were overcrowded and unsafe, the community and political outcry against the homes spoke of not wanting “those people” in the neighborhood. People with former addictions are considered people with disabilities and are protected from discrimination under the Fair Housing Act. The perspective of the focus group on people with disabilities was that “there is a huge need for these facilities, and the City makes them difficult.”

The Cincinnati zoning code defines a “family” as not more than four people unrelated by blood, marriage or adoption, and limits where group homes of more than four residents can locate. It makes distinctions among different types of group homes (e.g. assisted living, developmental disability dwelling, fraternity/sorority, patient family home, shared housing for the elderly, homeless shelter, and transitional housing). The neighborhoods and blocks where the homes are permitted depend on how it is classified. These restrictions can be impediments to fair housing choice.

The City is currently rewriting its zoning code. It received a Sustainable Communities Challenge Grant from HUD to help support the development of a new Land Development Code. Advocates have recommended that in rewriting the code, the City removes all zoning classifications that are based on who will be living in residential housing. It would continue to have an occupancy standard based on square footage to prevent overcrowding, but it would apply equally regardless of whether the residents have disabilities or how they are related.

***Recommendation 2.1:*** In adopting Cincinnati’s new Land Development Code, consider removing all zoning classifications based on who lives in residential property.

**2015 Action Plan:** The City is reviewing suggestions made for the new Land Development Code, including this suggestion. City staff will work with the FHAC to address this issue.

**2016 Action Plan:** County staff will work with HOME to determine the specific jurisdictions where this problem exists and develop a plan of action to remedy this situation.

## **2.2 Within the county jurisdictions, zoning limits the possibilities for affordable housing.**

Focus group participants noted that some of the mostly-white communities have zoning that designates only single-family housing and especially large-lot, single-family housing, often with minimum house sizes. Participants felt these zoning restrictions reflected community attitudes of not wanting affordable housing. One developer reported that a jurisdiction insisted on a high percentage of one-bedroom units as a condition to granting permits because they do not want children. He said, “We know the market,

and this is not what people want today.” It is beyond the scope of this Analysis to review the zoning in each of the 49 jurisdictions in Hamilton County. Such a review would be the starting point in addressing this impediment.

**Recommendation 2.2:** Review zoning codes in Hamilton County and make recommendations to the jurisdictions on changes needed to comply with the Fair Housing Act and to affirmatively further fair housing. Include a review of the jurisdictions’ reasonable accommodation procedures.

**2015 Action Plan:** The County plans to offer a seminar for local communities on fair housing requirements as related to zoning codes. County staff also will offer to review local communities’ zoning codes for compliance with fair housing laws.

### **2.3 Zoning and building codes can make accessibility modifications expensive and burdensome.**

Focus group participants said that the City requires people making reasonable accommodations requests to go through a zoning variance process that requires a \$300 fee, public notice and a public hearing. This is particularly burdensome when a person needs the modification, such as a ramp, to be able to leave the hospital or rehab center and return to their home. An accommodation may be needed if the ramp would violate zoning setback or side yard rules. As part of the rewrite of the City’s zoning code, advocates have recommended that the City establish an administrative reasonable accommodation procedure that is separate from the formal zoning variance process to expedite reasonable accommodation requests and make them less burdensome.

**Recommendation 2.3:** Cincinnati establishes an administrative reasonable accommodation procedure that is separate from the formal zoning variance process to expedite reasonable accommodation requests and make them less burdensome.

**2015 Action Plan:** The City will implement administrative changes to lessen this burden.

### **2.4 Local government staff members appear to lack understanding of fair housing laws.**

Based on comments from focus group participants, those who enforce zoning and building requirements seem unaware of laws regarding reasonable accommodations and modifications for people with disabilities and discrimination against families with children. While some fair housing training for local government employees has been offered, it would be useful to provide training targeted specifically at zoning and building enforcement staff.

**Recommendation 2.4:** Provide fair housing training for local zoning and building staff.

**2015 Action Plan:** We will schedule training for city and county staff who enforce zoning and building modifications.

## **3. Affordable housing is concentrated in racially segregated areas.**

There is a lack of support for new affordable housing because of NIMBY (“not in my backyard”) attitudes in many communities. Developers in the focus group talked about the difficulty of developing affordable housing when facing community opposition and the tendency to avoid the problem by building market rate housing. They noted that even high-end multi-family developments can face opposition in some Hamilton County jurisdictions.

The Low Income Housing Tax Credits awarded by the state tend to be concentrated in racially segregated areas. The tax credits are used primarily to support the rehabilitation and preservation of current affordable housing, rather than building new housing. The local inventory of HUD-assisted multi-family housing is large and many properties are old and in need of expensive rehabilitation to continue to be viable.

The Cincinnati Metropolitan Housing Authority currently is reviewing its asset management inventory and is considering the sale of some of the scattered site housing it bought in the last 25 years. These units were acquired to give public housing residents the opportunity to live outside of the large public housing projects in racially identifiable areas of concentrated poverty. The assisted housing map and table in Section 3 of this report show the extent to which CMHA has been successful in offering choices to low-income, primarily African American, residents in most jurisdictions in the County. The disposition of all or part of this inventory without replacement housing in the same communities would be a step backwards in ensuring fair housing choice.

***Recommendation 3.0:*** Encourage CMHA to maintain its scattered site inventory and assist it in obtaining funding to maintain and expand scattered site public and affordable housing.

***Recommendation 3.0.1:*** Require all City-funded residential development to follow inclusionary housing policies as required by law as recommended in **Plan Cincinnati**.

***Recommendation 3.1.2:*** Advocate fair housing standards throughout the region as recommended in **Plan Cincinnati**.

**2015 Action Plan:** The City will consider a policy that prioritizes mixed-income (and mixed use) housing development in applications for funding. County will advocate for affordable housing to be developed throughout the entire region, as opposed to a few select areas.

**2016 Action Plan:** The County will be using HOME funds to develop new affordable housing outside of the City of Cincinnati which will help to deconcentrate affordable housing in racially segregated areas.

#### **4. Barriers to mobility of families with vouchers**

The Housing Choice Voucher program or “Section 8” is designed to give families who need rental assistance more choices in where they live. Currently about 10,000 households have Housing Choice Vouchers in Hamilton County, and 88% of them are African American. With the tenant-based voucher, they find housing on the private rental market and use the assistance to pay rent wherever they choose

to live. The foreclosure crisis has opened up more single-family homes throughout the county for rental, which could be an opportunity for more families with vouchers to move to opportunity areas. Several barriers were identified for families to fully exercise this choice.

**4.1 Many in the focus groups talked about people not wanting to move to certain communities because they have a reputation as being unwelcoming or even dangerous for African Americans.**

Memories are long, and parents pass down warnings about white neighborhoods their children should avoid because, when they were young, it was dangerous for a African American youth to be seen there. Today the warnings often involve stories of police in certain communities stopping any African American driving through. It doesn't help when community leaders are quoted in the media insulting people with housing assistance as occurred in the last couple of years when the housing authority signed an agreement to place 32 units of public housing in a primarily white township and when a candidate for state representative called Section 8 a "cancer" on the community. Whether or not these perceptions and reputations reflect today's reality, they are the basis of a family deciding where to live.

**Recommendation 4.1:** Work with Cincinnati Community Councils and County jurisdictions to encourage welcoming initiatives and become more inclusive in leadership development and civic activities.

**Recommendation 4.1.2:** Ask City Community Councils to annually report the composition of their Boards compared to their community.

**Recommendation 4.1.3:** Fund and support fair housing testing and enforcement activities to mitigate discrimination in housing (**Plan Cincinnati** recommendation).

**2015 Action Plan:** The City will begin to draft an inclusion policy to be adopted by Community Councils. The inclusion policy may include reference to inclusion of persons of all races, ethnicities and income levels, and renter as well as homeowner households.

The City will continue to provide funding for Fair Housing activities including testing and enforcement activities.

The City and County will work collaboratively to host community forums in neighborhoods to foster exchange and open dialogue among residents.

County will increase funding to HCV (Housing Choice Voucher) Mobility Program, facilitated by HOME (Housing Opportunities Made Equal).

**2016 Action Plan:** The City and County will work collaboratively to host community forums in neighborhoods to foster exchange and open dialogue among residents.

County will continue increased funding to HCV (Housing Choice Voucher) Mobility Program, facilitated by HOME (Housing Opportunities Made Equal).

#### **4.2 Landlords can decide not to accept Section 8, so it is a major barrier to choice if too few participate in the program.**

Rental property owners in the focus group reported that accepting vouchers in Hamilton County is a “tremendous hassle.” They referred generally to the “bureaucracy” and specifically to the time to get approvals. “I need to turn properties fast and lose money when it takes them weeks to inspect the property and do the paperwork.” The rents that CMHA will pay are seen as lower than what owners can get as market rent. CMHA’s policy allows 80% of market rent in some cases. There is frustration over units that fail inspections over small items even after an owner has invested in expensive rehab of the unit and the tenant loves it. Landlords also report frustration with turnover of CMHA staff. “I never know who to talk to.”

For years the rental market in Hamilton County was relatively soft, so rental property owners were willing to accept Housing Choice Voucher tenants rather than take a loss on a unit sitting vacant for a number of months. In the last couple of years demand has increased in the rental market with fewer vacancies and increasing rents. Developers are announcing plans to build new apartment complexes to meet the demand and landlords are now showing apartments to groups of applicants on the same day and selecting the one with the highest income and best credit. In such a market, landlords who once rented to families with vouchers are pulling out of the program because it is not worth the effort when they have market rate applicants. This significantly restricts choice for the families with vouchers in the more desirable neighborhoods.

***Recommendation 4.2:*** Encourage CMHA to review the Housing Choice Voucher program to make the program more acceptable to rental property owners. Work with CMHA to track families with vouchers who live in low-poverty communities in Hamilton County.

County will encourage landlords currently participating in the County’s TBA/TBRA Programs to research and become involved with CMHA’s HCV program. Since the regulations are very similar to the County’s program, transitioning to HCV would be simple.

**2016 Action Plan:** County is working with CMHA to transition over 90% of clients from TBRA/TBA programs to the HCV program during 2016.

#### **4.3 Families with vouchers are not knowledgeable about opportunity communities.**

In Hamilton County families with vouchers are pretty much on their own in finding suitable housing from a landlord who accepts the voucher. CMHA refers families to a national website, [www.gosection8.com](http://www.gosection8.com), and asks landlords to post vacancies on that website. It also periodically hosts a Super Saturday event at their offices where landlords with vacancies and families looking for housing can connect. HOME operates a small Mobility program, funded with City and County CDBG funding, that recruits landlords in low-poverty areas and refers tenants with vouchers. The program places about 60 families a year with current funding. With two part-time employees, it is not able to serve all the families looking for help in finding housing.

In interviews for the Analysis of Impediments, families with vouchers reported that their primary concern in looking for housing was the safety and security of their children. They say it is discouraging when so many landlords refuse to take the voucher and they have time constraints in finding a new place. It is hard to look at different places in unfamiliar neighborhoods when they have an hourly job, children, and no car. They often accept units that are not desirable and end up moving again at the end of the lease.

Methods other regions have used to remove barriers to the housing choice of families with vouchers include passing “source of income” protection making it illegal discrimination to refuse to rent to a family who otherwise qualifies because part of the rent payment is coming from a government program. Some areas provide a robust Mobility program to counsel families and familiarize them with low-poverty neighborhoods. Notable examples are Baltimore and the Chicago area Mobility demonstration project that is a joint effort of eight housing authorities in that metropolitan area.

**Recommendation 4.3.0:** Support adding source of income protection to Ohio’s fair housing law.

**Recommendation 4.3.1:** Continue City and County support for the Mobility program to help more families find rental opportunities in the neighborhoods of their choice.

County will increase funding to HCV Mobility Program, facilitated by HOME.

## **5. Barriers for immigrant populations**

Although the area’s Hispanic population is only a little over 3%, the maps in Section 3 show that most Hispanic families live in just a few County jurisdictions and City neighborhoods. Focus group participants stated that many of the Hispanic families live in deplorable conditions in housing not of their choice. The barriers noted were:

### **5.1 There is a lack of Spanish-speaking staff for public services and among landlords.**

Hispanic immigrants reported moving to apartment complexes even though the conditions are poor because a property manager speaks Spanish. When HOME’s tenant advocate encourages tenants to report serious conditions problems to local government inspectors, a common response is, “I can’t; no one there speaks Spanish.” When tenants agree to let HOME make the complaints on their behalf, the HOME staff person must go onsite with the Health or Building inspector to interpret.

The City Health and Building departments do not have a Spanish-speaking employee who conducts inspections although they can “borrow” an employee from other duties when necessary. The situation in the County is more complex because many small jurisdictions have their own building inspectors. The County Health Department has one Spanish-speaking staff person.

**Recommendation 5.1:** Explore options to increase staff capacity to work with Spanish-speaking residents in departments that take complaints and enforce laws related to housing conditions. Provide

language training for current employees. Work with existing nonprofit organizations such as Su Casa and Santa Maria Services who provide services to these residents.

**2015 Action Plan:** Add Spanish language options to City’s main customer service line.

City and County will explore online and software to translate documents, etc.

Include human resources preference for bilingual skills for key customer service positions.

County will research the possibility of adding Spanish language options to the current phone service.

## **5.2 Immigrants feel unwelcome in some communities and tend to avoid these areas.**

Participants in the focus groups told of how responsive and surprised immigrants were when a community or agency made an effort to make them feel welcome by having material in their language, a liaison, or just acknowledging them and inviting them to community meetings. Participants in the Spanish-speaking focus group said the segregation patterns shown in the maps were not the result so much of people wanting to live together, but lack of information about other areas and fear of not being welcome.

***Recommendation 5.2:*** Encourage and support community events that engage immigrant families as neighbors, potential business customers, and parents.

**2015 Action Plan:** Research the option to restart the Urban Homesteading Program including a focus to work with immigrant families.

County will encourage participating community to provide various pertinent government documents in languages targeted toward their respective immigrant populations.

## **6. Barriers to African American Homeownership**

The foreclosure crisis increased opportunities to buy outside of traditional African American neighborhoods because the properties have become more affordable. However, at the same time, credit standards have tightened making it more difficult to obtain a mortgage loan to purchase a home. HMDA data reported by lenders and reported in Section 3 shows African American homebuyers in Hamilton County face significantly higher mortgage rejection rates than whites, regardless of their incomes, and when they do get a mortgage, it is more likely to be a high-cost loan. While not denying that some individual discrimination may exist, lenders say the difference is primarily because African Americans have lower credit scores and less savings or family help available for a down payment.

Focus groups identified as barriers the lack of understanding of the lending process, fear of predatory lending, and a general distrust of banks. One focus group member said because the African American community was targeted for predatory loans, “the fear of predatory lending is still strong and very alive.” It was felt that traditional housing counseling services reach only the most motivated who feel

they are ready to buy a home. Participants suggested that more general financial education was needed starting at the school level. At a Fair Lending Forum in Cincinnati this year, there was a recommendation that rather than providing in-depth housing counseling, there was a need for “expert help,” someone knowledgeable who was available to answer questions and explain the mortgage process. That person would be objective without a financial interest in the transaction and could reassure the borrower about what was normal and flag predatory terms.

Another barrier identified at the Fair Lending Forum was the current housing market conditions in traditional minority communities. Affordable single-family homes that are attractive to community members ready to move up to homeownership often do not meet lender inspection standards or, if they have been rehabbed by nonprofit community development corporation, do not appraise at a sales level that covers the rehab costs. The number of foreclosed properties in poor shape for sale in the neighborhoods depresses house values to the point where the cost of rehab cannot be recovered.

***Recommendation 6.0:*** Support more financial education, analyze existing services provided by local nonprofits in this area to answer questions, explain the mortgage process and conduct outreach on homeownership/lending.

**2015 Action Plan:** City and County will conduct an analysis of homebuyer education services provided by local nonprofits to determine whether these services should be enhanced or adapted to better meet the needs of potential homeowners.

Research options to implement a “promotoras” strategy in which community liaisons would be trained to provide information and advocacy to their neighbors.

**2016 Action Plan:** No action was taken on this issue in 2015. City and County staff have all turned over during 2015. County staff will ensure that research of existing homeowner education services occurs in 2016.

## **7. Barriers to housing choice for people with disabilities**

Lack of accessible housing and difficulty locating what exists are the primary barriers to housing choice for people with disabilities. Focus groups talked about the lack of accessible housing from their different perspectives. Disability group members said there is little accessible housing, and it is difficult find what is out there. Rental property owners said accessible housing is easy to rent because of the demand. Realtors noted that there is little on their Multiple Listing Service, and accessibility is not searchable on MLS. Some noted that it is very difficult for someone with a voucher to find an accessible unit. In subsidized housing, it is particularly difficult for families to find accessible housing. What little is available is mostly one-bedroom or in senior developments.

### **7.1 People don’t have resources to make modifications.**

The region has an old housing stock and people with disabilities often don’t have the resources to make modifications in the older buildings. The City and County support a non-profit agency to provide

accessibility modifications for low- and moderate-income homeowners. Based on the 2009 Analysis of Impediments recommendations, the County began a program to help fund modifications for low- and moderate-income tenants. Funding for this program was reduced to \$25,000 each year for the 2012-14 program years and it is not available to tenants who live within the City of Cincinnati.

Modifying old buildings can be very expensive. More accessible housing would be created naturally if more new affordable housing was being built in the region. New multifamily housing must meet the Fair Housing Act's basic accessibility requirements and would meet the needs of many of the area's residents with disabilities. However, very little new affordable housing is being constructed. Low Income Housing Tax Credits and available government grants go primarily to rehab and preserve current affordable housing developments.

**Recommendation 7.1:** Provide funding assistance for low- and moderate-income renters to make accessibility modifications in Cincinnati and the balance of Hamilton County.

**2015 Annual Action Plan:** Implement the Modifications for Mobility program with Housing Repair Services to provide City rental residents with options to make their homes accessible.

County will increase funding for its Modifications for Mobility Program from \$25,000 to \$50,000 annually.

County will provide \$90,000 to the Housing Network of Hamilton County to acquire and rehabilitate a multi-family structure for use by low-income disabled persons.

## **7.2 Housing for people with mental disabilities is often opposed by the neighbors because of fear of the residents.**

Recent examples cited by focus group participants were the community opposition to the sober living group homes in Price Hill and to a proposed permanent supportive housing project in Avondale. In both cases, neighbors expressed fear for their children because of the mental disabilities of the residents of the housing. City elected officials have sympathized with the fears of the neighbors to the extent that one City Council member has publically stated that people have a right to decide who will move into their neighborhood.

**Recommendation 7.2:** Provide support and assistance in working with the neighborhoods to groups providing housing for people with mental disabilities. Train elected officials in the City and County on fair housing, particularly the rights of people with disabilities.

**2015 Annual Action Plan:** Plan training for elected officials. Include elected officials in the City as well as all County jurisdictions. County will increase funding for its Excel Development Tenant Based Rental Assistance Program which provides rental subsidies to persons with mental disabilities. Funding will be increased from \$127,500 to \$140,000.

**2016 Annual Action Plan:** County will be using HOME funds to develop new affordable housing specifically targeted for persons with disabilities.

#### **Attachment D: Public Hearing Process**

The draft 2016 Annual Action Plan was written with the assumption that 2016 grant amounts will be flat with 2015 grant amounts. Hamilton County will hold a public hearing on December 16, 2015 to consider this first draft, which includes activities and projects to be funded during the 2016 program year. This hearing fulfills the requirements of Hamilton County's Citizen Participation Plan for the 2016 program year.

A draft of the 2016 Action Plan will be made available, both online and in our offices, for public review and comment between December 4, 2015 and January 5, 2016. No requests to review the plan were made and no public comments were been received.

The Board of County Commissioners approved the Action Plan on January 20, 2016; and submission to the Department of Housing and Urban Development (HUD) will occur when grant amounts are released from HUD.

**Affidavit of Publication**

**Publisher's Fee 198.21    Affidavit Charge 0.00**

**RECEIVED**

DEC 15 2015

State of Ohio }  
                          }  
                          } SS.  
                          }  
Hamilton County }

BY \_\_\_\_\_

Personally appeared Lorella Strickley-Hen

Of the The Enquirer, a newspaper printed in Cincinnati, Ohio and published in Cincinnati, in said County and State, and of general circulation in said county, and as to the Kentucky Enquirer published in Ft. Mitchell, Kenton County, Kentucky, who being duly sworn, depose and saith that the advertisement of which the annexed is a true copy, has been published in the said newspaper times, once in each issue as follows:  
11/30/15

- Cincinnati Enquirer
- Kentucky Enquirer
- Cincinnati.Com

Public notice is hereby given that Hamilton County, Ohio has drafted the 2016 Action Plan for the Community Development Block Grant, HOME Investment Partnerships, and Emergency Solutions Grant programs. A public hearing will be held on Wed, December 16 at 11:30 AM, County Administration Building, 138 E. Court St, Room 603; Cincinnati, OH 45202. A 30 day comment period will begin on December 4 and end on January 5, 2016. The Board of County Commissioners will approve the final plan on January 13, 2016. The Plan is available at [www.hamilton-co.org/commdev](http://www.hamilton-co.org/commdev) or 138 E. Court St, Room 1002. Written comments can be mailed to Community Development, 138 E. Court Street, Room 1002 or sent via email to [joy.pierson@hamilton-co.org](mailto:joy.pierson@hamilton-co.org)  
889814

Lorella Strickley-Hen

AFFIANT

Sworn to before me, this 11/30/15

Crystal Williams  
Notary Public of Ohio



Crystal Williams  
Notary Public, State of Ohio  
My Commission Expires 08-24-2020