



2014 Program Year Action Plan

The CPMP 2014 Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

2014 Action Plan Executive Summary:

Overall, within Hamilton County, cost burden rather than the availability of standard housing units is the primary problem faced by lower income renter households, with cost burden and to a lesser degree, physical deficiencies being a problem for owner occupants. Housing overcrowdedness is primarily a problem for large families, particularly in the rental market.

Hamilton County generally has an adequate supply of housing to meet the needs of its residents, but lower and moderate income residents of the County do have affordability issues in accessing that housing. The County's 2014 HOME grant is \$1,001,122, an increase of \$74,663 from the 2013 grant; however, this amount is still approximately 24% less than the grant received in 2011, creating challenges in bridging the affordability gap. The County's CDBG grant for 2014 is \$2,894,289, a slight decrease of \$16,102 from 2013. Due to the fact that our 2013 allocation was almost \$500,000 higher than we anticipated and our 2014 allocation is at approximately the same level, we were able to increase funding for a few countywide activities that had received reduced funding in 2012. The County has always aimed to use the funding we do have in a manner that will have the greatest impact for the greatest number of people.

Strategies to End Homelessness as the lead agency for the City of Cincinnati/Hamilton County Continuum of Care will continue to develop and implement a single, coordinated, inclusive homeless assistance system which supports all homeless persons in their movement from homelessness to economic stability and affordable permanent housing within a supportive community.

The County's objective of providing for the availability/accessibility of decent housing will be met by focusing on the need for shelter beds for homeless men, improving access to

agencies serving the homeless, and providing funding to make modifications to both rental and homeownership units for handicapped accessibility.

The County's objective of providing for the affordability of decent housing will be met by focusing on the need for home repairs by owner occupants, affordable rental housing for low income and formerly homeless renters, financial assistance to low- to moderate-income home buyers, counseling and small grants to help homeowners avoid foreclosure and concentrated code enforcement in selected areas of the County.

The County's objective of providing for the availability/accessibility of suitable living environments will be met by focusing on the need for repairs of deteriorating streets and sidewalks, improvement to the physical infrastructure and public facilities to make them accessible to the handicapped, a variety of social services for low to moderate income persons, facilities and services targeted to senior citizens, and providing access to health services to low- to moderate-income persons.

The County's objective of providing for affordable suitable living environments will be met by focusing on the need of low to moderate income County residents for food, clothing and other support services.

The County's objective of providing for the sustainability of a suitable living environment will be met by focusing on the need for revitalizing community facilities particularly in neighborhood business districts, construction or repair of recreational facilities, and the demolition of deteriorated structures county wide.

The County's objective of providing for the availability/accessibility of economic opportunity will be met by focusing on the need for remediation of environmental hazards in brownfields and demolition of blighted commercial structures throughout the County.

An evaluation of past performance under this plan shows progress in meeting the identified priorities of bridging the affordability gap in rental housing, making homeownership more accessible and affordable, providing scarce resources across many communities of Hamilton County to benefit low-moderate income populations, and making services for the homeless and chronically homeless more accessible, comprehensive, and cohesive.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

2014 Action Plan General Questions response:

1. The Hamilton County Consolidated Plan jurisdiction includes 26 municipalities and 10 unincorporated townships; only 12 out of 48 county jurisdictions are not participating in this plan. (See Map 1)

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 in the area with a population of approximately 297,000, and encompasses 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.

US Census data indicates that the highest concentrations of minority population are within Cincinnati south of State Route 562, and along the I-75/Reading Road corridor leading northeast out of the city. The highest minority concentrations outside Cincinnati include historically black neighborhoods including Lincoln Heights and West College Hill. Several older suburban communities have increasing numbers of minority residents resulting from out-migration from Cincinnati and Hamilton County. Median household incomes and poverty rates roughly parallel patterns of minority concentration, with the poorer neighborhoods located inside Cincinnati and the wealthiest in eastern Hamilton County. (See Map 2)

2. Because Hamilton County qualifies as an Urban County, its entitlement size depends on the demographics of participating local jurisdictions. In order to distribute CDBG funds among participating jurisdictions, the County considers how the demographics of each jurisdiction factor into the formula HUD uses to calculate the County's overall entitlement, the community development priorities in each jurisdiction, the quality of projects proposed, and how the needs of each jurisdiction compare to the entire urban county. To assist with this process, Hamilton County prepares a three-year funding plan for each jurisdiction that is synchronized to the period of their Cooperation Agreement. This 2014 Action Plan reflects projects from the third year of the three year funding plan.

County wide activities, including planning, program administration, critical and emergency housing repairs, emergency food and services, homeless services,

Jurisdiction

homeless shelter operations, demolition, and foreclosure prevention counseling, typically account for about 50% of the funded activities during a three-year funding plan.

3. In developing project activities, the primary obstacle in meeting under-served needs is availability of resources. In 2014, the resources available from CDBG, HOME, and ESG funds will be allocated based on the third year of the three-year plan. By following the 3 year plan, allocation of resources can be maximized by making projects available to all participating jurisdictions at some time during this 3 year plan.

4. In addition to the CDBG, HOME and ESG grants expected to be received from HUD, Hamilton County also expects to have Housing Choice Vouchers and Public Housing funds available through the Cincinnati Metropolitan Housing Authority. Furthermore, the County expects projects from other organizations/companies to be funded through the use of Low Income Housing Tax Credits administered by the State of Ohio.

McKinney-Vento Homeless Assistance Act (HUD) funds expected to be available to the Cincinnati/Hamilton County Continuum of Care in FY2013/14 include:

Funding applied for in 2012 and awarded 2013. Grants are one year		
Source	Type	Amount
Emergency Solutions Grant	Emergency Shelter	450,000
Emergency Solutions Grant	Homeless Prevention	724,797.18
Continuum of Care	Permanent Supportive Housing	6,544,763.18
Continuum of Care	Rapid Re-Housing	2,671,130
Continuum of Care	Transitional Housing	1,147,053
Continuum of Care	Supportive Services Only	1,024,931
Continuum of Care	HMIS	388,611
Funding applied for in 2013 to be awarded in 2014. Grants are one year.		
Emergency Solutions Grant	Emergency Shelter	450,000
Emergency Solutions Grant	Homeless Prevention	516,945
Continuum of Care	Permanent Supportive Housing	8,085,578
Continuum of Care	Rapid Re-Housing	3,398,169
Continuum of Care	Transitional Housing	1,149,003
Continuum of Care	Supportive Services Only	1,024,931
Continuum of Care	HMIS	388,611
Continuum of Care	CoC Planning	162,774

Ohio provides funding to agencies in the County under the Ohio Housing Trust Fund, and also provides funding for Vouchers for persons with Mental Health problems. Locally, special levies provide support for health care for low-income persons, assistance for seniors, persons with mental health and substance abuse problems, and persons with mental retardation or developmental disabilities.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

2014 Action Plan Managing the Process response:

The Hamilton County Board of Commissioners delegates responsibility for the preparation of the Consolidated Plan to the Community Development Division of the Planning and Development Department. Community Development is also charged with implementing the CDBG, NSP, HOME, and ESG programs, including the development of Contracts with outside agencies and the coordination of bids and contracts let by local units of government.

For the updated 5 year Plan submitted in 2009, staff from the Hamilton County Planning and Zoning Division assisted in updating data and narratives used in this Plan. In the fall of 2011, the County formulated its 2012-2014 three year Plan for CDBG, HOME, and ESG by soliciting applications from its 33 participating cities, villages, and townships, for projects needed for those communities. At the same time, the County's Community Development Advisory Committee (CDAC) met to review the needs and proposed activities for countywide projects. These recommendations were then presented to, and eventually adopted by the County Commissioners for inclusion in the 2012-2014 three year plan and the existing Consolidated Plan. As a result of this planning process, the funding for 2014 was also formulated, and has been used as a basis for determining final projects to be funded for this 2014 Action Plan.

In order to assess the needs that exist within Hamilton County, the Community Development Division consulted with various housing, homeless, social services, fair housing, elderly and disability agencies, as well as the Housing Authority, to both gather data and identify service gaps. In addition, the Community Development Advisory Committee met in 2011 to review current plans, and to advise on information for this new Plan. More details regarding agencies consulted in the process is discussed in the Strategic Plan.

During 2010, the Consolidation of several departments of the County, namely Building Inspections, Public Works, Regional Planning, and Community Development, enhanced the coordination of some aspects of public and private housing development. To enhance coordination among health and service agencies, as well as housing, staff will continue to participate in the Affordable Housing Advocates meetings, housing workshops, regional meetings, and other venues where a multitude of agencies that serve the entire area will be conversing.

Additional information, specific to homeless and other special populations follows:

The **Continuum of Care (CoC)** process is managed jointly with the City of Cincinnati and Hamilton County. The process utilizes an inclusive model for planning and decision making. Funding is applied for directly to HUD and received directly by the applicant organization. All organizations who provide housing and/or services for the homeless within the jurisdiction participate (40 plus agencies, 200 different programs) and representatives of: local government, state government, community foundations, the Cincinnati Police Department, local business leaders, and other non-profit and neighborhood groups are also full participants in the process. Importantly the process includes the “homeless think tank” a focus group (averaging 50 persons) designed exclusively to empower the homeless to provide input on what works and what needs to change in the community. On a year-round basis, the CoC is managed by the Homeless Clearinghouse and the Working Groups of the CoC. Strategies to End Homelessness Inc. acts as the lead agency for all CoC related functions.

Citizen Participation

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

2014 Action Plan Citizen Participation response:

1. To solicit citizen input in the development of the Consolidated Plan, Hamilton County adopted a Citizen Participation Plan as outlined in Exhibit 1. That Plan provided for two tracks whereby local communities identified needs, priorities, and projects at a neighborhood level, and countywide needs were identified by a separate process managed by Community Development. The County held a public hearing in August, 2011, in conjunction with the Community Development Advisory Committee meeting concerning the 2012 – 2014 funding cycle. For the 2014 Action Plan, two public hearings were held. The initial hearing, prior to receiving our FY2014 grant allocations from HUD, was held on December 11, 2013 by the Board of County Commissioners, during which a draft of the 2014 Action Plan was presented with specific emphasis on the activities and projects to be funded during fiscal year 2014. A draft of the Action Plan was completed on December 4, 2013 and made available for public comment between December 4, 2013 and January 4, 2014. A second public hearing was held on April 2, 2014 to consider increases to activities as a result of receiving our FY2014 grant allocations from HUD. A second 30-day comment period on the updated Action Plan was held March 24 – April 22, 2014.

2. There were 2 comments received at the Public Hearing held on December 11, 2013, or during the 30 day comment period ending January 4, 2014. There were XX comments received at the Public Hearing held on April 2, 2014 or during the 30 day

comment period ending April 22, 2014. A summary of the comments received are appended to this plan, as exhibited in Appendix I.

3. All public notices related to the Action Plan Hearings are printed in the Cincinnati Enquirer and the Cincinnati Herald, an African American owned newspaper, which has as its readership a large African-American population. General announcements about the annual process are made at meetings of the Affordable Housing Advocates, which include representatives of agencies that serve disabled populations, non-English speaking populations and minority populations. Announcements are also made through the Affordable Housing Advocates e-mail list-serve, which reaches populations unable to attend the meetings. Information was also posted on the Department's web site at www.hamilton-co.org/commdev.

4. Any comments received were accepted and incorporated into the final draft of this plan.

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

2014 Action Plan Institutional Structure response:

1. Hamilton County works with a number of agencies, consisting of public institutions and non-profit organizations, in delivering community development and housing services to the residents of the County. The following paragraphs will discuss the several organizations that the County will continue to work with in 2014, and how they contribute to the implementation of the Consolidated Plan.

The County funds the Hamilton County Development Company (HCDC), a private non-profit corporation, for general county-wide economic development planning. HCDC in turn administers SBA Programs, State of Ohio Programs, EDA Programs, and Enterprise Agreements throughout the County. HCDC has close working relationships with private industry, businesses, developers, and service agencies that facilitate coordination of economic development activities within Hamilton County. Because of the range of effective tools that the Hamilton County Development Company has available to it, Community Development Block Grant Funds are not usually invested in economic development activities within the County.

The County also contracts with People Working Cooperatively (PWC), a non-profit organization which provides critical home repairs, energy conservation, and maintenance services to low-income, elderly and disabled residents within the Greater Cincinnati region. By contracting with PWC, the County is able to provide both emergency and small repairs to very low income homeowners throughout Hamilton County. This partnership nicely complements the Water and Sewer Tap and Repairs Program administered directly by Hamilton County. The County now also provides some additional funding to PWC to provide accessibility modifications to low income renters.

In addition to the non-profit mentioned above, the County also contracts with Homesteading and Urban Redevelopment Corporation (HURC), a non-profit organization which provides support to the County's NSP communities in acquiring foreclosed properties through the National Community Stabilization Trust. This organization has also contracted with specific communities in the County to aid in implementing the NSP program within those areas.

In the past, the County has partnered with Cincinnati Housing Partners (CHP), a non-profit housing and community development organization that provided affordable rehabbed and newly constructed homes to Hamilton County residents in Lockland, North College Hill, and St. Bernard. Unfortunately, at this time, CHP is dissolving and as a result the County will no longer be able to partner with the organization. Additionally, the County partnered with Working in Neighborhoods (WIN) to rehab houses for first time homebuyers in Elmwood Place utilizing HOME CHDO funds. In 2013, the County partnered with Habitat for Humanity of Greater Cincinnati, a faith-based non-profit organization, to rehab and/or construct single-family houses for first time homebuyers in Forest Park using HOME CHDO funds. The County had been working with Habitat for Humanity utilizing NSP1 and NSP3 funds for the same purpose.

The County also works cooperatively with the City of Cincinnati on regional issues that are common to both jurisdictions. These include homeless services through the Continuum of Care, the Analysis of Impediments study and the Fair Housing Action Plan, and the NSP2 Program, of which the County serves as the lead entity.

In the past several years, informational meetings have been held between jurisdictions in Southwest Ohio who administer the CDBG and HOME Programs. Community Development continues to be interested in other regional meetings which strive to increase education and cooperation between entities.

The County also contracts with a number of non-profit social service delivery agencies that are both experienced and well placed in meeting the needs of Hamilton County residents. These agencies include: Goodwill for housing placement for homeless veterans and the FreeStore for food and other materials for low income persons. Hamilton County believes that these institutional relationships are an effective way to serve the needs of Hamilton County residents within the confines of available budget resources.

The County also works closely with the Cincinnati Metropolitan Housing Authority in the delivery and coordination of assisted housing with the County. As the County runs a HOME funded tenant based rental assistance program, modeled after the Housing Choice Voucher Program, the agencies work with each other in coordinating policies such as setting a common payment standard, utility allowances, and rent reasonableness policies. The Housing Authority has also been the recipient in the past of County HOME money that has been used to develop scattered site publicly owned housing throughout participating jurisdictions of Hamilton County. The County will continue to work with CMHA in 2014 and beyond in developing partnerships. In particular, the County entered into a Cooperation Agreement with CMHA in 2012 to develop assisted housing in the County over the next several years.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

2014 Action Plan Monitoring response:

Hamilton County Community Development has all monitoring responsibilities for the Community Development Block Grant, HOME, ESG and NSP Programs. Prior to issuing payment for any goods or services funded under the various programs, the County verifies that the goods or services have been provided and that the various program requirements have been met. The County assumes total responsibility for most federal requirements including environmental reviews, labor standards, bidding and contract requirements. In addition, the Hamilton County staff directly monitors subrecipients on an annual basis to assure compliance with federal regulations. The County also collects information on the utilization of minority businesses in conformance with the minority business outreach requirements that the County has established.

More detailed information specifically regarding CDBG projects is as follows:

Monitoring of projects in the cities, townships, and villages which participate in the CDBG program will vary depending on the type of project.

Infrastructure projects

The Labor Standards Representative (LSR) consults with the community representative before the project is bid, to explain the bidding process, Davis Bacon requirements, etc. A Bid packet is sent out when the community is ready to bid out the project. The bid packet contains all the information the community needs to adhere to Federal and CDBG requirements.

When the project is ready to be awarded, the LSR attends the pre-construction meeting, to advise all parties involved of the Federal requirements, and to advise them of our involvement during the project.

During construction, payrolls are monitored by the LSR. Occasionally, the LSR may do an on-site interview of workers to monitor the Davis Bacon requirements. The LSR, or other staff of the Department, may visit the construction site to monitor progress of the work.

Bills may be submitted during the construction work, and will be paid by the Department after review by the LSR and the Director or Program Manager. Final bills will only be paid if all payrolls and other paperwork have been submitted properly.

A final visit will be made to the site of the work after completion, sometime during that next year. A picture will be taken to include in the project file. In some cases, if a site visit is not possible, the picture can be received from a Community representative.

Acquisition projects

The Labor Standards Representative (LSR) consults with the community representative before the project is bid, to explain the bidding process, David Bacon requirements, etc. A Bid packet will be sent out when the community is ready to bid out the project. The bid packet contains all the information the community needs to adhere to Federal and CDBG requirements.

A representative of the Department will stay in touch with the Community representative to monitor progress in bidding and awarding of the contract for purchase. Once the purchase has been made, the Community will send the certification and request for payment to the Department, along with verifying information, to request payment be made to either the Seller or reimbursement to the Community.

A representative of the Department may request an appointment with the Community to view the property acquired, and take a picture for the project file.

Public Service Projects

Consultation with the Community representative and the Agency representative will be made before the contract is awarded, to discuss the scope of service and budget for the contract. The contract may be executed between the Community and the Agency, between HCCD and the Agency, or with all 3 parties, depending on the relationship.

Once the project starts, ongoing desk monitoring of the project will occur through approval of bills, telephone conversations, review of monthly or quarterly reports from the Agency, and occasional meetings. Projects that have been ongoing for several years and have no findings will be monitored in the field approximately every 2 years. Newer projects or projects with performance issues will be monitored in the field annually.

Rehab/repair projects

Once the project starts, ongoing desk monitoring of the project will occur through approval of bills, telephone conversations, review of reports from the Community, and occasional meetings. Projects that have been ongoing for several years and have no findings will be monitored in the field approximately every 2 years. Newer projects or projects with performance issues will be monitored in the field annually.

HOME projects follow monitoring guidelines set up to adhere to the regulations of the HOME Program. That ensures that projects are reviewed yearly for occupied status and income eligibility, and every 1, 2, or 3 years for HQS acceptability.

NSP projects are monitored as identified in the procedures for CDBG projects.

Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

2014 Action Plan Lead-based Paint response:

A large percentage of the County's housing stock was built before 1978 and lead-based paint is a widespread problem throughout Cincinnati and older suburban communities. Hamilton County follows all applicable federal and state regulations for lead-based paint testing and mitigation. All housing renovation projects that use any Federal funds are inspected for deteriorated paint, and the appropriate entity or certified Inspector inspects and approves projects prior to occupancy. The HOME funded Tenant Based Assistance Program follows the applicable regulations for units occupied by children less than six years of age.

Programs directly administered by Hamilton County that are most likely to involve lead-based paint include the Neighborhood Stabilization Program, and HOME funded programs such as the Housing Rehabilitation undertaken by the CHDO funds, and the Tenant Based Rental Assistance Program.

The General Health District conducts investigations into lead poisoning of children, lead risk assessments for property owners, and free lead testing. They also provide HEPA vacuum rental and other information for contractors and others doing home repair work. For the past few years, free lead trainings were offered by the University of Cincinnati, through a grant they obtained. These trainings were offered to contractors to become certified Lead Risk Assessors or to become certified to oversee Lead Paint Abatement activities.

During the 2014 Program Year, Hamilton County will continue existing efforts to reduce the Lead Based Paint hazards in the County. Specifically, repair work done by People Working Cooperatively under a Contract funded with CDBG funds will comply with all applicable Federal and State of Ohio regulations. PWC has trained both staff and sub-contractors in Lead Safe Work Practices. The County will continue to fund CHDO and NSP homeownership activities, and where they involve rehabilitation, lead regulations will be followed to include abatement when needed. The TBA Program will continue to follow lead regulations, and Risk Assessments and Clearances will be obtained when needed. PWC has agreed to provide Lead Risk Assessment and Clearances for Community Development when needed, for a nominal fee.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

2014 Action Plan Specific Objectives response:

During the 2014 Program Year, several countywide programs that were previously affected by reductions in funding will see increases due to increased CDBG funding received in 2013 and 2014 (from 2012 funding levels). The County's priority is to make the greatest impact for the greatest number of people possible with the funding received. Listed below are a few of the programs and projects identified as priorities within the County:

Hamilton County will use Community Development Block Grant Funds to assist homeowners with needed repairs under a contract with People Working Cooperatively. That assistance will be limited to homeowners at or below 50% of the median income. The grant award to PWC will be \$600,000 for 2014. The County will also provide CDBG funds to PWC to provide accessibility modifications for disabled low-income renters, under the new Mobility Modifications Program for Renters Program, first funded in 2010.

The County will also assist low to moderate income homeowners who are ordered to tap into new sewer or water lines or are ordered to repair or replace failing septic systems. Funding for this program is \$50,000 in 2014, a 50% increase from the 2013 funding level. The tap assistance and home sewage treatment system repair program is intended not only to help specific homeowners, but also to improve overall environmental quality in previously unsewered areas of the County.

The Cities of Forest Park and Springdale, and the Village of Greenhills will use CDBG funds to operate small repair programs for its low income homeowners.

Under the HOME Program, a majority of resources will be directed toward a Tenant Based Rental Assistance Program that is limited to persons with disabilities or formerly homeless families moving into transitional housing. At the beginning of 2012, the County revised its policies and procedures to plan for the reduction in HOME funds. As a result of those policy decisions, the number of participants in the TBA program has decreased. HOME funds for 2013 increased by approximately 20% compared to 2012, but the number of participants dropped as a result of natural attrition. The County anticipates increasing participation through the opening of the waiting list in 2014 provided that there is not a major cut in the 2014 HOME grant amount.

The County will continue to work with Community Development Housing Organizations (CHDO's) to develop homeownership opportunities in depressed neighborhoods of Hamilton County.

The County will use excess HOME funds (if available) for gap financing in support of federally funded housing projects, such as HUD 202, LIHTC, or other subsidized rental projects.

The HOME matching requirements will be met by utilizing funds provided by the State of Ohio for Rental Assistance administered by the County Mental Health Board. These State funds supplement and are a match to County allocated TBA HOME Funds. The matching requirements for the Emergency Solutions Grant Program are provided by a number of sources throughout Hamilton County.

It is hoped that federal housing tax credits will also be utilized by non-profit developers within Hamilton County. In this regard, LISC is working with selected non-profit developers both to develop overall capacity, and to provide pre-development financing needed for potential tax credit projects. The County will support these applications through support letters, and funding, if possible, as identified above.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

2014 Action Plan Public Housing Strategy response:

Cincinnati Metropolitan Housing Authority has primary responsibility for both public housing improvements and resident initiatives, including encouraging the participation of public housing residence in both the management of their units and participating in homeownership opportunities. The County is supportive of an initiative raised by the Analysis of Impediments study, which would form a committee to involve Public Housing and Voucher tenants in community meetings to address NIMBYism and community development needs. The County intends to have representation on this committee, and will support other initiatives that encourage public housing residents to be more involved in management of their units and homeownership opportunities.

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

2014 Action Plan Barriers to Affordable Housing response:

Many barriers to affordable housing are inherently related to discrimination in housing. The Fair Housing Action Plan, a part of the Consolidated Plan, addresses many actions to be undertaken by Hamilton County in the next few years. Many of these address barriers to affordable housing. Actions to be taken in 2014 not specifically addressed in the Fair Housing Action Plan are identified below:

1. Hamilton County has utilized its CHDO set-aside to work with Habitat for Humanity of Greater Cincinnati to develop new affordable housing for homeownership in the City of Forest Park.
2. The County will continue to utilize a significant portion of its HOME Investment Partnerships Program funding for a Tenant Based Rental Assistance Program during 2014. The County will allocate about \$615,000 in 2014 for the TBA program. The TBA program is focused on providing Tenant Based Rental Assistance to families or individuals who have physical or mental disabilities. Eight of the TBA Vouchers are also set-aside for homeless families moving into County supported transitional housing. The County will also continue to operate the TBRA Program for the City of Cincinnati, so that its residents can also access this type of assistance.
3. The County continues to fund foreclosure prevention counseling activities so that affiliated agencies can provide this service to homeowners at risk of losing their homes to foreclosure.

The County will provide funding to Housing Opportunities Made Equal in 2014 for its Mobility Counseling Program, which provides assistance to Housing Choice Voucher and TBA Grant holders in locating housing in low-poverty and non-impacted areas of the County.

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).
2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.
3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
 - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.

- d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
 - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
- a. Describe the planned use of the ADDI funds.
 - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
 - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

2014 Action Plan HOME/ADDI response:

Hamilton County will not receive ADDI funds in 2014, as Congress has not appropriated these funds for several years. All 2009 and earlier ADDI funds have been spent. However, Hamilton County will provide HOME funds to Habitat for Humanity of Greater Cincinnati, which will ultimately be used to provide first time homebuyers zero percent interest first mortgages, as an affordability subsidy. The mortgage for these funds will be structured according to the recapture method, with a shared appreciation schedule over the 15 year affordability period.

The County will not use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.

2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2014. Again, please identify barriers to achieving this.
4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

2014 Action Plan Special Needs response:

1. SOURCES OF FUNDS

McKinney-Vento Homeless Assistance Act (HUD) funds expected to be available to the Cincinnati/Hamilton County Continuum of Care in FY2013/14 include:

Funding applied for in 2012 and awarded 2013. Grants are one year.		
Source	Type	Amount
Emergency Solutions Grant	Emergency Shelter	450,000
Emergency Solutions Grant	Homeless Prevention	724,797.18
Continuum of Care	Permanent Supportive Housing	6,544,763.18
Continuum of Care	Rapid Re-Housing	2,671,130
Continuum of Care	Transitional Housing	1,147,053
Continuum of Care	Supportive Services Only	1,024,931
Continuum of Care	HMIS	388,611
Funding applied for in 2013 to be awarded in 2014. Grants are one year.		
Emergency Solutions Grant	Emergency Shelter	450,000
Emergency Solutions Grant	Homeless Prevention	516,945
Continuum of Care	Permanent Supportive Housing	8,085,578
Continuum of Care	Rapid Re-Housing	3,398,169
Continuum of Care	Transitional Housing	1,149,003
Continuum of Care	Supportive Services Only	1,024,931
Continuum of Care	HMIS	388,611
Continuum of Care	CoC Planning	162,774

The City of Cincinnati expects to receive an approximate total of \$689,591 in Emergency Solutions Grant Funding in 2014; Hamilton County expects to receive \$220,000. Additionally, the list of McKinney-Vento Homeless Assistance Act (HUD) funds expected

to be available to the Cincinnati/Hamilton County Continuum of Care in 2013 and 2014 are listed above.

2. HOMELESSNESS

Cincinnati and Hamilton County are leaders in services for the homeless in many ways, nevertheless there are still opportunities to better serve homeless single men and women. Shelters currently provide a place to stay and facilities that meet basic needs. However, the shelters struggle with the number of homeless people entering the system on a daily basis. The shelters face many challenges to providing best practice services that support an exit from homelessness. Beyond the shelter system, three other items were identified as contributing factors to homelessness: 1) the availability of appropriate housing (especially for special needs subpopulations) to facilitate their exit from the streets or shelters; 2) the accessibility of mental health and substance abuse services for all those in need to address the special issues that precipitate or perpetuate their homelessness; and 3) the funding to sustain efforts to make significant and lasting improvements to the system. Additionally, agencies serving the homeless are challenged to increase communication and resolve conflicts with their host neighborhoods in more proactive and productive ways.

3. CHRONIC HOMELESSNESS

The City of Cincinnati, Hamilton County and the CoC have consistently utilized the Consolidated Plan as the process and document for strategies and planning to address homelessness, including chronic homelessness. On October 8, 2008 City Council approved Ordinance 0347-2008 which directed the CoC to “immediately address the inadequacy of the current provision of services for single homeless individuals in the City of Cincinnati, and to put in place a comprehensive plan to implement such services.” Further, the ordinance states “the plan must ensure that as a critical segment of the homeless community, single homeless men and women, will have access to safe, appropriate shelter facilities and that such facilities will provide comprehensive services necessary for homeless individuals to obtain and maintain housing.” The plan was completed in March of 2009 and adopted by both Cincinnati City Council and Hamilton County Board of County Commissioners. Pursuant to the plan’s recommendations, the city and county administration will incorporate the Homeless to Homes plan as the basis for the Homeless/Special Needs section on homeless individuals within the 2010-2014 Consolidated Plan.

The recommendations and strategies from Homeless to Homes that have been incorporated into the Consolidated Plan relating to ending chronic homelessness are as follows:

1. Reconfigure the emergency shelter beds for single individuals into smaller bed configurations that provide a higher level of services to residents; provide more intensive case management services that support individual development; develop and follow through with case plans that move them quickly from homelessness into housing.

The Homeless to Homes plan recommends maintaining the existing beds in the Emergency Shelters serving single men and women, but reconfiguring them to better serve the homeless population. Many of the recommendations have already been completed, and the following are still being implemented:

- a. Young Adults ages 18-24 should be separated from older populations. Lighthouse Youth Services opened a new, separate shelter for young homeless men and women ages 18-24 called Lighthouse on Highland. The facility opened in January of 2012 and continues to work with the Homeless to Homes Shelter Collaborative to raise capital and operating funds for the initiative. The resource center, formerly known as Anthony House, moved into the Lighthouse on Highland building and continues to provide day services to homeless young adults
- b. The Emergency Shelter for Single Women should be separated from the Men's Shelter. Currently, women are sheltered at the Drop Inn Center with the men. While they are housed in a separate area of the shelter, they do enter through the same entrance and share the same common areas. The YWCA has been identified as the agency that will build and operate a new Emergency Shelter for Single Women. The YWCA is working with Strategies to End Homelessness and 3CDC to develop this facility. The site has been identified and purchased with demolition completed. The site is shovel ready and awaiting confirmation on final gap capital funding before breaking ground. The YWCA anticipates opening in late 2014 or early 2015.
- c. City Gospel Mission has secured a new site to increase the number of faith-based beds, as well as daytime and case management services. They have secured a building permit and a contractor and are awaiting final funding before breaking ground on the new facility. City Gospel Mission anticipates opening in late 2014. Once opened and operating, they will have 76 beds for homeless men.

The Homeless to Homes Shelter Collaborative is working to raise capital and operating funds for the Homeless to Homes initiative and facilities.

Housing the chronically homeless remains a high priority in our community. To that end, all Permanent Supportive Housing Programs applying for funding in the FY 2013 CoC Competition must demonstrate how they will prioritize available housing for chronically homeless individuals and families.

County ESG funds are being used for a Rapid Re-housing program for families who currently reside in one of the five family shelters. Families can receive financial assistance for deposit, rent, or utilities to assist them in quickly exiting a shelter. This program was developed as short-term assistance for families that have the ability to maintain their housing after they have exited the shelter but need one to three months of rental assistance. The shelters provide ongoing case management services while the families work toward stabilization.

4. HOMELESSNESS PREVENTION

Based on the success of the HPRP homelessness prevention program, Strategies to End Homelessness, in collaboration with HPRP partners, used ESG funds to design and implement a new homelessness prevention program with the goal of providing people at-risk of entering a shelter with resources and case management to avoid shelter entry. When people call for shelter, they are screened to determine eligibility for the Shelter Diversion program. If a person is found to be eligible (income below 30% AML, no other housing options, or financial resources), they are referred to a case manager in one of the three United Way partner agencies. Each agency provides a case manager who will work with a family or individual for up to six months to stabilize their housing and prevent homelessness.

Shelter Diversion funds can be used for deposits, rental payments, rent arrears, utility arrears, utility payments, and moving costs to assist a person in finding permanent housing. A person will develop a case plan that will address their stabilization needs, including housing. All of the agencies participating in Shelter Diversion use the HMIS system (VESTA). Callers are screened at Central Access Point (CAP) and referrals are made through VESTA. All client data is maintained in VESTA along with financial requests. City and County ESG funds are used to implement this program.

Additionally, the Veteran's Administration funds two Supportive Services for Veteran's Families (SSVF) grants which provide homelessness prevention and Rapid Re-Housing assistance to veterans and their families. The programs are operated by Goodwill and Talbert House. Veterans and their families who are homeless or at-risk of becoming homeless and have an income less than 30% of area median income are provided with case management and/or financial services. Veterans and their families are referred by CAP to Goodwill or Talbert House for assistance.

5. DISCHARGE COORDINATION POLICY

Discharge Planning activities are coordinated with the appropriate State level departments through the Interagency Council on Homelessness and Housing. The following documents the protocol established for each required discharge plan area:

Foster Care

Each public children's service agency (PCSA) shall provide services and support to former foster care recipients that complement the young adult's own efforts and shall be available until the young adult's 21st birthday. Independent living services available to young adults aged 18 to 21 include: daily living skills, assistance with education or training, career exploration, vocational training, job placement and retention, preventative health activities, financial, housing, employment, education and self-esteem counseling, drug and alcohol abuse prevention and treatment. An agency may use up to 30% of its federal allocation for room and board for the emancipated youth up to age 21, which includes assistance with rent, deposit, utilities, or utility deposits.

Ohio requires that if a child is 16 years or older and is likely to remain in care the agency must have a written independent living plan to achieve self-sufficiency developed within 30 days of the completion of an assessment. The plan should be based upon the assessment and include input from the youth, the case manager, the caregiver, and significant others. The independent living plan should be reviewed at least every 90 days

until the agency's custody is terminated. A review of the state protocol at the local level (Cincinnati/Hamilton County) through the Hamilton County Department of Job and Family Service (HCJFS) indicates that assessments are completed on all foster teens at age 16 or as they come into custody, using the Daniel Memorial Assessing and Contracting with Youth tool which provides for the assessments and the follow-up planning. The HCJFS After Care Worker is responsible for devising an individual plan for each emancipated youth, including housing plans. HCJFS is the PCSA responsible for the implementation of the policy at the local level.

Health Care

The Ohio General Assembly enacted laws governing the transfer and discharge of residents in nursing homes (NHs) and residential care facilities (RCFs) [Ohio Revised Code (ORC) section 3721.16], adult care facilities (ACFs) [ORC section 3722.14], and community alternative homes (CAH)[ORC section 3724.10]. The Ohio Department of Health (ODH) promulgated Chapter 3701-16 of the Ohio Administrative Code (OAC) that further expounds on the transfer and discharge rights of NH and RCF residents and OAC rules 3701-20-24 (ACF) and 3701-16, 23 (CAH). ODH ensures that these provider types follow the appropriate regulations regarding transfer, discharge, or both, by reviewing documentation that the facility has initiated discharge planning and that alternatives have been explored and exhausted prior to discharge.

ODH as the State Survey Agency for Medicare, surveys hospitals for compliance with Medicare certification regulations related to resident discharge rights 42 CFR 482.13 and discharge planning, 42 CFR 482.43 which establish hearing rights for premature discharge and requirements for planning for patients' needs after discharge.

LocallU, the hospitals have joined together to fund the Center for Respite Care, which is for homeless individuals who need medical support. The Admission to Respite requires: a) the hospital social worker to provide referral information to Respite; b) Respite staff evaluates patient data to determine if respite care is appropriate; c) hospital staff provides relevant medical background documentation; d) hospital discharges to Respite with a 30 day supply of all prescribed medications and transports the patient to Respite. Respite works with the patient to secure income and housing.

Additionally, starting in 2013 the Homeless to Homes Shelter Collaborative, consisting of five emergency shelter facilities that provide services to single homeless men and women, will receive Indigent Care Levy funds in support of their shelter services. These funds will support improved case management and day services focused on connecting homeless individuals to health care, mental health services, housing and employment. The Indigent Care Levy funds support the Homeless to Homes plan recommendation for all people in need to have access to safe, appropriate shelter facilities with comprehensive client services.

Mental Health Care

It is the policy of Ohio Department of Mental Health (ODMH) that homeless shelters are not appropriate living arrangements for persons with mental illness. Patients being discharged from ODMH Behavioral Health Organizations/Hospitals (BHO) are not to be discharged to a shelter or to the street. Community Support Network (CSN) programs are required to have appropriate emergency housing plans in place in the event their clients undergo unexpected residential change. These entities, in conjunction with the responsible or contracting Board or agency, must exhaust all reasonable efforts to locate

suitable housing options for patients being discharged. Patients in ODMH BHOs shall not be discharged to homeless shelters and clients in an ODMH CSN program shall not be relocated from community housing options to homeless shelters unless the responsible board or contract agency has been involved in the decision making process and it is the expressed wish of the affected person and other placement options have been offered to the affected person and refused. When a discharge or relocation to a homeless shelter occurs under these guidelines, the reasons shall be documented in the person's chart and reviewed via the BHOs quality improvement process. Persons may not be discharged or relocated to homeless shelters for the convenience of staff, as a punitive measure, or for expediency. ODMH BHO policies shall be consistent with this directive.

The Hamilton County Mental Health Board is in compliance with this directive. Locally, a system of "quick access" beds, within apartments has been developed to support the above policy and protocol. The Quick Access beds are shown on the Housing Inventory as a method of tracking persons and ensuring discharge to shelters does not occur.

Emergency Solutions Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

2014 Action Plan ESG response:

NOT APPLICABLE

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.
2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

2014 Action Plan Community Development response:

Because of the diverse nature of Hamilton County, the non-housing Community Development needs within the County are also diverse. Despite the diversity, some

common elements are present. First, there's a need for public infrastructure reconstruction throughout most of the County. There are also neighborhood social service needs that aren't adequately addressed through United Way Agencies or other sources of funding. Beyond these broad categories there are specific needs within communities, such as repairing senior citizen centers for expanding older populations or making accessibility improvements to public infrastructure or parks facilities. Due to the overabundance of blighted abandoned buildings (as a result of the foreclosure crisis), demolition has become a priority need for the County. The County also has needs in the Economic Development and Job Training areas that are addressed with non-Community Development Block Grant Funds, hence, they are not considered priorities for this Plan. The County considered a number of factors including absolute need, relative need, availability of alternative funds and programs, and local preferences in assigning high, medium and low priorities to activity categories. Those identified as high needs rated high in the criteria, while those that rated low had adequate programmatic and funding sources from non-Block Grant Programs.

The table labeled Community Development Needs in the needs.xls file identifies short and long-term Community Development Goals for the 2010 - 2014 program years. Also, the summaries.xls document identifies a summary of the objectives for 2014.

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

2014 Action Plan Antipoverty Strategy response:

During the next year, most anti-poverty strategies will be implemented through the various agencies mentioned in the Strategic Plan. CDBG funds which specifically aim to reduce the number of poverty level individuals are targeted for the Goodwill Program, which helps homeless individuals obtain jobs and housing.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

2014 Action Plan Specific Objectives response:

Over the next year Hamilton County hopes to meet some of the housing and supportive service needs of a portion of the special needs population who are not currently served. Hamilton County will be using relatively few Consolidated Plan resources to meet the needs identified in the Non-Homeless Needs Table. It is hoped that private developers

will propose Housing Tax Credit Projects to serve the housing needs of the lower income population, HUD Section 202 projects for the elderly, and HUD Section 811 for the disabled population. It is also hoped that other funding, both local, state and federal, can be obtained for these and other projects to serve low-moderate income populations, including special needs populations. The County will support these applications. The County has provided CDBG funds for handicapped accessibility for renter households, as the need had been expressed over the past few years, with no apparent source of funds to address it. This Program is being administered by People Working Cooperatively.

The primary resources that will be used to meet both housing and supportive service needs of the non-homeless special needs populations will be State of Ohio and Hamilton County Tax Levy proceeds that are targeted within the County to special needs populations including Mental Health, Substance Use disorder, and Developmentally Disabled populations. Caracole coordinates most of the HIV/AIDS housing assistance within the County. During the next year we expect this pattern of resource allocation to continue.

Housing Opportunities for People with AIDS

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.
2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.

7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

2014 Action Plan HOPWA response:

NOT APPLICABLE

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

2014 Specific HOPWA Objectives response:

NOT APPLICABLE

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

ACTIONS TO ADDRESS FAIR HOUSING IMPEDIMENTS

Hamilton County has allocated \$75,000 in 2014 CDBG funding to carry out its fair housing activities under contract with Housing Opportunities Made Equal (H.O.M.E.). Fair Housing activities addressed under this contract include complaint resolution services and enforcement activities to reduce unlawful discrimination in housing, and fair housing education for real estate professionals, County staff, and other consumers. This program addresses many of the resolution of illegal practices recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

For 2014, \$24,000 of CDBG funding is allocated for the Housing Opportunities Made Equal (H.O.M.E.) Mobility Program, which provides placement and transportation services to HCV and TBA participants to assist them in securing affordable housing in low poverty neighborhoods outside of the City of Cincinnati. In addition, H.O.M.E. also provides an outreach component to landlords. This program offers housing choices for residents, as one of the recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

The County will allocate \$40,000 in 2014 CDBG funding for the Homeownership Preservation Program, which provides counseling to homeowners at risk of foreclosure. This program addresses one of the predatory lending recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

The County is continuing to allocate funding in the amount of \$25,000 to People Working Cooperatively (PWC), to carry out an accessibility modifications program for low income renters. This program addresses one of the accessible housing recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

For 2014, \$615,000 of HOME funding is allocated for the Tenant Based Assistance (TBA) Program. The TBA Program covers a portion of the household rent payment for approximately 125 households, of which a member must be disabled. This program addresses the lack of accessible housing and improving choice recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

FAIR HOUSING ACTION PLAN

A combined committee composed of representatives of Hamilton County and the City, as well as a Citizen's Advisory Committee, reviewed the updated Impediments to Fair Housing Study and provided implementation strategies. A Fair Housing Action Plan was submitted to HUD in July, 2010. The committee, including periodically the citizens committee, work on an ongoing basis as the 18 impediments are addressed. An updated version of the Fair Housing Action Plan is submitted as part of this 2014 Consolidated Plan.