

Substantial Amendment to FY19 Annual Action Plan

Hamilton County, Ohio

April 16, 2020



Proposed Substantial Amendment to
Hamilton County
2019 Annual Action Plan

Amendment Section	Page Number
Action Plan	
A. General Information	2
B. Summary of Substantial Amendment Proposed Changes	3
C. Programs Affected by Substantial Amendment	4
D. Proposed Changes and Relationship to Consolidated Plan Goals	4
E. Citizen Participation and Public Comments	5
F. Authorized Signature	5

A. General Information:

This document serves as notification of a substantial amendment to the 2019 Annual Action Plan for Hamilton County. The document describes the proposed changes to the use of Emergency Solutions Grant funds and explains how these changes meet existing Consolidated Plan goals.

Grantee Name:	Hamilton County
Name of Entity or Department Administering Funds:	Planning + Development Department
Contact Person:	Joy M Pierson
Title:	Community Development Administrator
Address:	138 E. Court Street
Address Line 2:	Room 1002
City, State, Zip:	Cincinnati, OH 45202
Telephone:	513-946-8230
Fax:	513-946-8240
Email Address:	Joy.Pierson@hamilton-co.org
Authorized Official:	Jeffrey W. Aluotto
Title:	County Administrator
Address:	138 E. Court Street
Address Line 2:	Room 603
City, State, Zip:	Cincinnati, OH 45202
Telephone:	513-946-4436
Fax:	513-946-8240
Email Address:	Jeff.Aluotto@hamilton-co.org
Web Address Where Posted:	http://www.hamiltoncountyohio.gov/pd/commdev/reports.asp

B. Summary of Substantial Amendment Proposed Changes

Hamilton County (County) is submitting this Substantial Amendment to the 2019 Consolidated Plan Annual Action Plan to include the funds awarded by Congress through the Coronavirus Aid, Relief and Economic Security (CARES) Act for the Emergency Solutions Grant (ESG) only. The Community Development Block Grant (CDBG) funds awarded in the CARES Act will be submitted in a separate substantial amendment.

Pursuant to the US Department of Housing and Urban Development (HUD) regulations at 24 CFR Part 91 and County policy, any change of 10% or more to the individual grant award requires a substantial amendment to be approved by the Board of County Commissioners and submitted to HUD. Under normal circumstances, HUD requires that the County post the proposed changes to grants using

a 30 day citizen participation process prior to submitting an amendment to the current HUD Action Plan.

Given the critical nature of the funding need under the COVID-19 pandemic, the CARES Act provides for this requirement to be relaxed as listed below:

That the use of amounts provided under this heading in this Act shall not be subject to the consultation, citizen participation, or match requirements that otherwise apply to the Emergency Solutions Grants program, except that a recipient must publish how it has and will utilize its allocation, at a minimum, on the Internet at the appropriate Government web site or through other electronic media.

This amendment will be posted on the Planning + Development website to meet this standard. Summary of new funds is listed below:

Program Name	Action Plan Goal	Amount	2019 Grant	% Change
ESG	Serve Homeless Families and Reduce Homelessness	\$1,009,176	\$279,229	Not Applicable

C. Programs Affected by Substantial Amendment

The following programs and projects are affected by the changes proposed in this amendment:

Program	Goals	Program	Amount Added
ESG	Serve Homeless Families and Reduce Homelessness	Temporary Emergency Shelter	\$500,000
ESG	Serve Homeless Families and Reduce Homelessness	Services for Homeless (Shelter, Temporary Shelter, Rapid Rehousing, Shelter Division, Homeless Prevention, and Supportive Services)	\$433,488
ESG	Serve Homeless Families and Reduce Homelessness	Administration	\$75,688
Total			\$1,009,176

D. Proposed Changes and Relationship to Consolidated Plan Goals

The proposed changes and relationships to Consolidated Plan/Action Plan Goals follow:

Program	Goals	Change to Action Plan Goals
ESG	Serve Homeless Families and Reduce Homelessness	Rapid Rehousing/Shelter Diversion/RRH, etc.: 150 Households Assisted Homeless Person Overnight Shelter: 350 Persons Assisted

E. Citizen Participation and Public Comments

The table below outlines the citizen participation plan actions followed and public comments received:

Action Taken	Date	Public Comments
Public Notice and Amendment posted on Planning + Development website (See Attachment A)	April 10, 2020	No comments received
Emails to Homeless Clearinghouse, Greater Cincinnati Coalition for the Homeless and Affordable Housing Advocates (See Attachment B)	April 10, 2020	1 email was received (See Attachment C)

Summary of Comments Received:

Email received from agency that operates a small emergency shelter/transitional housing program in Hamilton County. Stated concern for allocating all of the ESG-CV funding to temporary emergency shelter in hotel/motel rooms. Asked that County provide a long term plan to utilize funds to secure more permanent housing for people experiencing homelessness.

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

Hamilton County is one of two entitlement grantees that received ESG-CV funds for the County Continuum of Care. The City of Cincinnati received \$3.5 million in ESG-CV funds; these funds have not been allocated to specific ESG programs at this time. County ESG-CV funds are currently split between temporary shelter in hotel/motel rooms (\$500K), other possible expenditures that may include temporary shelter (\$433,488) and administration (\$75,688). The County does not plan to expend additional funds for hotel/motel rooms, but does not know how the City of Cincinnati funds will be allocated.

County staff are working with Strategies to End Homelessness and the Rapid Rehousing working group to expedite placement of people into permanent housing. County staff and elected officials will continue to work with all possible partners and stakeholders to best plan for and allocate funds for current, mid-term and long term housing and safety needs for people experiencing homelessness.

Summary of comments accepted and reasons for accepting them:

N/A

F. Authorized Signature

By signing this amendment, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete, and accurate to the best of my knowledge. I also provided the required assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code Title 218, Section 1001).

Signature/Authorized Official:
Jeffrey W. Aluotto, County Administrator

4/16/2020
Date

Attachment A: Public Notice and Substantial Amendment Posted on County Website

Countywide Nonprofit Services RFP

HOME Affordable Housing RFP

Mini Planning Grant

For Local Governments

For Residents

Bid Documents

Plans & Reports

Contact Us

Planning + Development

• Mini Planning Grant

PUBLIC NOTICES

In accordance with 24 CFR 91.05(c)(2) and subpart B of the federal regulations relative to citizen participation for Community Planning and Development Programs and applicable waivers made available to those requirements through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Hamilton County is making an amendment to the FY19 Annual Action Plan available to the public through this notice. This amendment is allocating \$1,009,176 in additional Emergency Solutions Grant (ESG) funds received from the CARES Act

Public Comment Period and Process:

This Action Plan amendment is available for a 5-day public review and comment period from April 10, 2020 to April 15, 2020. Citizens wishing to submit written comments during the public review and comment period email comments no later than April 15, 2020 at 4 PM to Mr. Boubacar Diallo at Boubacar.Diallo@hamilton-co.org.

Hamilton County 2019 Action Plan Substantial Amendment
[Substantial Amendment ESG 2019v3.pdf](#)

Citizen Participation Plan
[Citizen Participation Plan.pdf](#)

GOVERNMENT
Agendas And Meeting Info
Board of County Commissioners
Calendar
Courts
Departments
Open Hamilton County

CONNECT
Find Our Buildings
Photo Submission
Events
News
Report A Concern
Social Media

WEBSITE INFORMATION
Accessibility
Disclaimer
Privacy Statement
Terms and Comment Policy
Feedback
Site Map

Hamilton County | All Rights Reserved | Powered by CivicLive | © 2020 Intrado Corporation.

4:36 PM
4/15/2020

Attachment B: Email Sent to Hamilton County Partners

From: Pierson, Joy

Sent: Saturday, April 11, 2020 8:17 AM

To: Josh Spring; rsaperstein@caracole.org; Amy Stewart; ginamarshhsc@gmail.com; John Schridder; staff@affordablehousingcincinnati.org; kfinn@end-homelessness.org

Subject: Substantial Amendment to Hamilton County's FY19 Annual Action Plan

All

Hamilton County has posted a substantial amendment to the FY19 Annual Action Plan allocating the Emergency Solutions Grant (ESG) funding from the Coronavirus Aid Relief and Economic Security (CARES) Act to the County website. The amendment can be found at the link below:

https://www.hamiltoncountyohio.gov/government/departments/community_development/cd_public_notices

Last week, the County Commissioners also allocated \$600,000 in tax levy funds for hotel/motel rooms. Please share with your networks.

Comments can be sent to Boubacar.Diallo@hamilton-co.org until April 15. The Board of County Commissioners will take legislative action to submit the amendment on April 16.

Thank you,

Joy Pierson

Community Development Administrator, Hamilton County Planning + Development

138 E. Court Street, Rm 1002, Cincinnati, OH 45202

O: (513) 946-8234 | C: (513) 317-5233 | Joy.Pierson@hamilton-co.org

Attachment C: Email Comment Received

From: Mary Ellen Mitchell [maryellen@stlydiashouse.org]
Sent: Wednesday, April 15, 2020 2:18 PM
To: Diallo, Boubacar
Subject: comments on funding for ESG action plan change

I'm concerned that an additional \$500,000- \$900,000 of ESG funds spent on motel rooms doesn't create a sustainable solution for the length of the need for social distancing (possibly a year or more). **Is there a way that a long term lease could be made on a space that is more appropriate for social distancing and more economically sustainable, like an apartment building? Could the existing spaces that they own (perhaps Bethany's shelter) be retrofitted for more distancing, as they are doing in the single shelters? Could the shelters requesting motels work as one entity in creating and staffing an appropriate socially distanced space, cutting down on staffing for four separate shelters that currently are vacant?** The last per night costs I heard on motels was \$100. STEH attempts to move people in 30 days, so in theory the per family cost for a motel is \$3000 + staffing for that length of stay. Assuming these variables and an additional \$600,000 spent on motels, shelters will be able to serve 50 families/individuals in motels for 4 months (or a total of 200 families/individuals from May- August). The need in our region is far greater and only growing. An [article released by STEH](#) reported that the number of unduplicated calls to the CAP line was 543 families per month for June - Sept 2015. We should assume this summer we will see at least that amount but likely more calling for shelter.

I'm also concerned that there isn't clarity about the reason for the move to motels. If the reason is CDC recommendations, will the county continue to fund motels until the CDC stops recommending social distancing? Or will the motel need continue until there is a vaccine? As large amounts of funding are being expended, does anyone know what an agreed upon outcome would be to stop using motels as shelter? **Is there an expectation that the Federal Government will continue to release large amounts of ESG funds seasonally to maintain the practice of using motel rooms as shelter until all parties agree this should stop. Assuming 200 families or individuals are given shelter each month, and assuming motels cost \$100 a night and this crisis goes on for a year, a total of \$7,300,000 is needed. Is it possible to commit this amount to this plan?**

A 1 bedroom apartment in our region typically runs \$500-\$700 per month. Assuming rent at \$700, 857 families could be served with \$600,000. Of course, 1 year leases would need to be signed, but in that case 71 apartments could be leased for a year for \$600,000. Even adding in utilities and furnishings this plan would be more cost effective and likely more hospitable to families in need, while providing a long term solution that could take us to the point of significant scientific progress on treatment or vaccine.

Should motels be our most prominent family and single shelter solution and no additional funds are allocated after this allocation, these funds will be spent long before widespread testing or vaccines are

available. I realize the immediate crisis left everyone in a hurry to find a rapid response and motels seemed the fastest option. I hope the county can now plan for a long term response, assuming a major change is needed in the way we shelter families for at least a year, if not indefinitely. If that response is to allocate \$7,300,000 to motels as shelter, the county needs to acknowledge this expense and plan accordingly at this point. **It is not acceptable to reach the end of this allocation and then close shelters for the remainder of the Covid-19 crisis. Please do not let this happen.**

Mary Ellen Mitchell

Lydia's House co-director

513-549-7752

StLydiasHouse.org