

CITY OF CINCINNATI 2010-2014 CONSOLIDATED PLAN STRATEGIC PLAN

November 15, 2009

GENERAL

EXECUTIVE SUMMARY

INTRODUCTION

The 2010-2014 Consolidated Plan provides the vision for housing and community development actions in the City of Cincinnati. The U.S. Department of Housing and Urban Development (HUD) requires recipients of Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) formula programs to prepare a Consolidated Plan every five years. In addition to meeting program submission requirements, it provides an opportunity for the City to shape housing and community development programs to create effective, coordinated improvement strategies for the City's neighborhoods.

The Consolidated Plan includes four main elements:

- Assessment of needs, including needs related to housing, homeless, economic development, quality of life, and non-homeless special needs populations.
- Identification of priority needs, including needs related to housing, homeless, economic development, quality of life, and non-homeless special needs populations.
- Identification of specific objectives to address identified housing, homeless, economic development, quality of life, and non-homeless special needs populations needs.
- An analysis of how the proposed activities will address the needs and objectives identified by the plan.

BASIC STATUTORY PROGRAM GOALS

Federal statutes for the CDBG, HOME, ESG, and HOPWA programs establish three basic goals: decent housing, a suitable living environment, and expanded economic opportunity.

- Decent housing includes the following:
 - Assisting homeless persons to obtain affordable housing;
 - Assisting persons at risk of becoming homeless;
 - Retaining the affordable housing stock;
 - Increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of

- disadvantaged minority groups without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability;
 - Increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to live in dignity and independently; and
 - Providing affordable housing that is accessible to job opportunities.
- A suitable living environment includes the following:
 - Improving the safety and livability of neighborhoods;
 - Eliminating blighting influences and the deterioration of property and facilities;
 - Increasing access to quality public and private facilities and services;
 - Reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods;
 - Restoring and preserving properties of special historic, architectural, or aesthetic value; and
 - Conserving energy resources and use of renewable energy resources.
 - Expanded economic opportunities include the following:
 - Job creation and retention;
 - Establishment, stabilization and expansion of small businesses (including micro-businesses);
 - The provision of public services concerned with employment;
 - The provision of jobs to low-income persons living in areas affected by those programs and activities, or jobs resulting from carrying out activities under programs covered by the plan;
 - Availability of mortgage financing for low-income persons at reasonable rates using non-discriminatory lending practices;
 - Access to capital and credit for development activities that promote the long-term economic and social viability of the community; and
 - Empowerment and self-sufficiency for low-income persons to reduce generational poverty in federally assisted housing and public housing.

The Consolidated Plan addresses how the City will pursue these basic goals through housing and community development programs.

SUMMARY OF OBJECTIVES

The following objectives address the highest priority needs for housing, community development, homeless, and non-homeless special needs populations in the City of Cincinnati. Detailed project descriptions can be found in the *Recommended Consolidated Plan Budget*.

Decent Housing Specific Objectives

- Improve the quality of owner housing (Housing Maintenance Services; Compliance Assistance Repair for the Elderly (Care) - 7287 housing units) (Homeowner Rehab Loan Program - 2,000 Other) (Neighborhood Capacity Building and Technical Assistance - 60 organizations)
- Improve access to affordable rental units (Tenant Assistance; Fair Housing Services - 23,500 people) (Section 8 Tenant Counseling and Placement - 200 households)
- Improve the quality of affordable rental housing (Code Enforcement Relocation - 1,000 households) (Rental Rehabilitation Program - 500 units) (Tenant Representation - 2,750 people)
- Increase the number of homeless persons moving into permanent supportive housing (Homeless to Homes - 600 housing units)
- Increase the availability of affordable owner housing (Strategic Housing Initiative Program - 115 housing units) (Emergency Mortgage Assistance - 225 households) (Tap/Permit Fee Assistance Program - 75 housing units) (Downpayment Initiative - 225 households) (Property Holding Costs - 225 public facilities/parcels) (Blueprint for Success - 10 housing units)
- Increase the supply of affordable rental housing (Tenant Based Rental Assistance - 170 households)

Suitable Living Environment Specific Objectives

- Increase the availability of affordable owner housing (Property Holding Costs - 225 public facilities/parcels) (Blueprint for Success - 10 housing units. Increase the availability of affordable owner housing (Tap/Permit Fee Assistance Program - 75 housing units)
- Increase the number of homeless persons moving into permanent housing (Bethany House; Interfaith Hospitality Network; Lighthouse Youth Crisis Center; Mercy Franciscan at St. John Over-the Rhine Temporary Housing; Mercy Franciscan at St. John Anna Louise Inn; Salvation Army Emergency Shelter; Shelterhouse/Drop Inn Center; YWCA Battered Women's Shelter - 21,915 households)
- Increase the range of housing options and related services for persons with special needs (Caracole House; Cincinnati Center for Respite Care; STOP AIDS Case Management; Northern Kentucky Independent Health District - 2,600 households)
- Improve economic opportunities for low-income persons (Blueprint for Success - 250 people)
- Improve the quality of affordable rental owner housing (Concentrated Code Enforcement; Hazard Abatement Program; Lead Hazard Program - 22,430 housing units)
- Improve quality/increase quantity of neighborhood facilities for low income persons (Millcreek Greenway Restoration - 5 public facilities)

Economic Opportunity Specific Objectives

- Remediate and redevelop brownfields (Strategic Program for Urban Redevelopment (SPUR) – 9 public facilities/acres)
- Improve economic opportunities for low-income persons (Earned Income Tax Credit (EITC) Outreach and Financial Literacy; Youth Employment Programs – 20,890 people)
- Improve quality/increase quantity of public improvements for lower income persons (Neighborhood Business District (NBD) Improvement Program – 425 businesses) (Neighborhood Business District (NBD) Property Holding Costs – 50 public facilities) (Avondale/Burnet NBD Improvements – 1 organization)
- Improve economic opportunities for low-income persons (Small Business Technical Assistance – 1,000 businesses) (Small Business Loan Fund – 30 jobs) (Corporation for Findlay Market – 5 organizations)

2010-2014 CONSOLIDATED PLAN RECOMMENDATIONS

The following Consolidated Plan recommendations address housing, economic development, quality of life, homeless, and non-homeless special population needs. City policies, reports, and plans, and community input were considered in the development of recommendations.

Development Vision Statement

Cincinnati and its neighborhoods will be strengthened by strategic efforts to increase the quality and diversity of housing, reduce crime and blight, and improve the vitality of small neighborhood business districts as well as large employment centers.

Overall Development Goal

Develop and support comprehensive efforts to expand choices and opportunities for individuals and families to enjoy decent housing, a suitable living environment, and expanded economic opportunities. Decent housing is affordable, safe, and accessible. A suitable living environment is safe, livable, free from blighting influences, and economically integrating.

Housing Goals

Housing Goal 1: Expand the diversity and quality of the housing stock.

Housing Objective 1 (H-1): Promote and retain affordable homeownership through new construction and renovation of housing units. Priority should be given to the conversion or occupancy of vacant buildings. Affordable and market rate homeownership units should be integrated to create mixed-income housing opportunities. Whenever possible, sustainable, energy-efficient, green building technologies and universal design principles should be used in the development of housing units and sites.

Housing Objective 2 (H-2): Develop and retain rental units that are affordable for persons of low and very low-incomes in a manner that is consistent with City policy.

Units should be located near or within neighborhood business districts to create stronger mixed-use districts. Rental units are encouraged to be developed in conjunction with market rate units and in areas with lower levels of poverty to create stable mixed-income communities and support economic integration. Whenever possible, sustainable, energy-efficient, green building technologies and universal design principles should be used in the development of housing units and sites.

Housing Goal 2: Provide supportive services to assist moderate, low and very low-income persons in finding and remaining in housing that is affordable, safe, and accessible.

Housing Objective 3 (H-3): Assist moderate-income renters make the transition to homeownership.

Housing Objective 4 (H-4): Provide assistance to low and very low-income persons in finding and retaining high-quality affordable rental units. The assistance should consider accessibility features, economic integration, proximity to jobs, and access to transportation networks when locating prospective units.

Housing Objective 5 (H-5): Provide assistance, including housing maintenance services and emergency mortgage assistance, to ensure that low and very-low income homeowners can remain in housing units.

Housing Objective 6 (H-6): Affirmatively further fair housing in accordance with the Fair Housing Act and the Impediments to Fair Housing Choice in Hamilton County, Ohio.

Economic Development Goals

Economic Development Goal 1: Promote commercial and industrial development and redevelopment.

Economic Development Objective 1 (ED-1): Support the development of new and expanded retail and office uses through funding assistance and public improvements. Whenever possible, sustainable, energy-efficient and green building technologies should be used in the development of new and expanded uses. Support should be targeted to redevelopment of existing commercial areas, focusing on designated NBDs and prioritizing those within designated Neighborhood Revitalization Strategy Areas (NRSAs). Where necessary, NBDs should be stabilized by reduction in NBD size through housing development in peripheral areas and/or on upper floors of commercial buildings.

Economic Development Objective 2 (ED-2): Encourage the development of new and expanded low-intensity industrial uses and the remediation and redevelopment of vacant and underutilized industrial property into light-industrial or commercial uses. Whenever possible, sustainable, energy-efficient and green building technologies should be used in the development of new and expanded uses. Support in the form of funding assistance and public improvements should be targeted to the designated Strategic Program for Urban Redevelopment (SPUR) districts, prioritizing the traditional industrial corridors in the Mill Creek valley, and to the growth opportunity areas identified by the GO Cincinnati Report (2008).

Economic Development Goal 2: Improve the economic conditions of people and organizations in order to promote business development and employment opportunities.

Economic Development Objective 3 (ED-3): Support financial education and technical assistance and capacity building for small businesses, Community Development Corporations (CDCs), and low-income individuals. Services should increase the number of financially secure residents; successful, sustainable businesses; and the stability of commercial districts in Cincinnati.

Economic Development Objective 4 (ED-4): Provide support for job-training and placement services and other employment opportunities for adults and adolescents. Services should target neighborhoods with rising levels of poverty and/or unemployment despite increasing educational and/or income levels. Whenever possible services should foster increased connections between employers and schools.

Quality of Life Goal

Quality of Life Goal: Promote sustainable neighborhoods through elimination of blighting influences and improved health and safety.

Quality of Life Objective 1 (QOL-1): Support the mitigation and/or removal of blighting influences such as non-code compliant buildings and properties; vacant and abandoned buildings and properties; abandoned automobiles; and environmental contamination, including underground storage tanks and lead hazards. Support positive methods of combating blight through development of parks and greenspace, and preservation and renovation of historic properties. Efforts should focus on primarily residential neighborhoods and designated NBDs, prioritizing those areas designated as NRSAs.

Quality of Life Objective 2 (QOL-2): Support health services and reduce lead hazards. Services should target uninsured and low-income individuals and families.

Quality of Life Objective 3 (QOL-3): Support and encourage public facilities improvements. Improvements should focus on primarily residential neighborhoods and designated NBDs, prioritizing those areas designated as NRSAs.

Quality of Life Objective 4 (QOL-4): Provide assistance to people and community groups aggressively working to improve the safety and perception of safety in their neighborhoods through Block Watch, Citizens on Patrol, Community Problem Oriented Policing (CPOP), and other crime reduction activities. Services should focus on primarily residential neighborhoods and designated NBDs, prioritizing those areas designated as NRSAs.

Homeless Population Goals

The homeless population goals and objectives were developed with input from the *Homeless to Homes* report and the City Administration. The Hamilton County Department of Community Development was also consulted during the development of the recommendations in order to ensure that the Continuum of Care is positioned to receive the maximum number of points in the Continuum of Care scoring system.

Several objectives contain language regarding the fair distribution and concentration of beds or housing units throughout the City and County. Following the adoption of the Consolidated Plan, the City, County, and the Continuum of Care, at a minimum, will work collectively to further define these terms. In addition to geography, housing characteristics that will help to ensure the needs of the participants are met through the housing location will be considered. These may include, but not be limited to, elements identified by the *Homeless to Homes* report: access to mass transportation (buses) and proximity and access to community amenities, including grocery stores and recreation, medical, training, mental health or substance use disorder treatment, and mainstream benefit/resource facilities.

Homeless Population Goal 1: *Need* – Information regarding the numbers, scope, and needs of homeless persons is accurate and current.

A. Specific to Chronic Homeless

Homeless Population Objective 1 (HP-1): Conduct on an annual basis a point-in-time study to provide accurate data on the number of chronically homeless persons.

B. All Homeless Individuals and Families

Homeless Population Objective 2 (HP-2): Conduct regular audits of the validity of the data in the HMIS system.

Homeless Population Objective 3 (HP-3): Continue the engagement of homeless persons in determining unmet needs.

Homeless Population Objective 4 (HP-4): Expand the process to track and document the causes/issues for recidivism.

Homeless Population Goal 2: *Quantity* –A sufficient quantity of suitable housing is available to meet the needs of the homeless population in the City of Cincinnati and in Hamilton County that is fairly distributed between the City and County and is not concentrated in any one area.

A. Specific to Chronic Homeless

Homeless Population Objective 5 (HP-5): Create permanent supportive housing units or tenant based rental assistance to meet the needs of the chronically homeless.

Homeless Population Objective 6 (HP-6): Ensure, to the extent possible, that housing units for homeless are fairly distributed within the City and County.

Homeless Population Objective 7 (HP-7): Ensure, to the extent possible, that beds and housing units for homeless are not concentrated in any one area based on a population ratio of the number of beds or units per Census Tract as reported in the most recent U.S. Census.

B. All Homeless Individuals and Families

Homeless Population Objective 8 (HP-8): Maintain the existing number of emergency shelter beds (as recommended in the *Homeless to Homes* report).

Homeless Population Objective 9 (HP-9): Increase the number of transitional housing beds for single individuals (as recommended in the *Homeless to Homes* report) with a fair distribution between areas of the City and County.

Homeless Population Objective 10 (HP-10): Increase the number of permanent supportive housing units for single individuals (as recommended in the *Homeless to Homes* report) with a fair distribution between areas of the City and County.

Homeless Population Objective 11 (HP-11): Continue the provision of permanent supportive housing for homeless persons in appropriate, diversified locations, according to individual need.

Homeless Population Objective 12 (HP-12): Increase temporary emergency shelter beds for families for seasonal overflow and poor economic conditions with a fair distribution between areas of the City and County.

Homeless Population Objective 13 (HP-13): Create new scattered-site transitional housing beds and permanent supportive housing options for families with a fair distribution between areas of the City and County.

Homeless Population Objective 14 (HP-14): Ensure, to the extent possible, that beds and housing units for homeless are not concentrated in any one area based on a population ratio of the number of beds or units per Census Tract as reported in the most recent U.S. Census.

Homeless Population Goal 3: *Quality* – Quality housing and services are available to meet the needs of homeless persons.

A. Specific to Chronic Homeless

Homeless Population Objective 15 (HP-15): Maintain the requirement that all emergency shelters meet minimum standards for shelter prior to approval for funding.

Homeless Population Objective 16 (HP-16): Continue to increase the quality and quantity of case management services.

Homeless Population Objective 17 (HP-17): Create new methods to ensure substance abuse and mental health treatment is sufficiently available to address the needs of the chronically homeless.

Homeless Population Objective 18 (HP-18): Ensure that beds and housing units are compatible with the neighborhood and will not have an adverse impact on the character of the area or the public health, safety, and general welfare.

Homeless Population Objective 19 (HP-19): Develop criteria for good neighbor plans/agreements and require that all new beds or housing units be reviewed and approved by the appropriate reviewing authority for conformance with the good neighbor plan/agreement.

Homeless Population Objective 20 (HP-20): Any new or additional housing or service programs for the homeless located in the City and the County must be coordinated with the appropriate department.

B. All Homeless Individuals and Families

Homeless Population Objective 21 (HP-21): Maintain the requirement that all emergency shelters meet minimum standards for shelter prior to approval for funding.

Homeless Population Objective 22 (HP-22): Continue Front Line Worker Training (FLWT), updating curriculum at least annually based on needs data and expanding offerings to provide training for aides/advocates/ house manager level workers.

Homeless Population Objective 23 (HP-23): Support agency use of HMIS data in determination of program effectiveness and for staff evaluations.

Homeless Population Objective 24 (HP-24): Ensure that beds and housing units are compatible with the neighborhood and will not have an adverse impact on the character of the area or the public health, safety, and general welfare.

Homeless Population Objective 25 (HP-25): Develop criteria for good neighbor plans/agreements and require that all new beds or housing units be reviewed and approved by the appropriate reviewing authority for conformance with the good neighbor plan/agreement.

Homeless Population Objective 26 (HP-26): Institute a template for case plan maintenance, which will follow the homeless client.

Homeless Population Objective 27 (HP-27): Any new or additional housing or service programs for the homeless located in the City and the County must be coordinated with the appropriate department.

Homeless Population Goal 4: Access/Paradigm Shift - Homeless persons efficiently and effectively obtain any and all mainstream resources and community systems or services for which they are eligible.

A. Specific to Chronic Homeless

Homeless Population Objective 28 (HP-28): Maintain the current level of coordination and services for outreach to chronically homeless street persons and increase the level for young adults and persons with substance abuse issues.

Homeless Population Objective 29 (HP-29): Expand the Central Access Point (CAP) program to enable the single homeless individuals to connect with information and referral services.

B. All Homeless Individuals and Families

Homeless Population Objective 30 (HP-30): Implementation of systems to improve access to housing/services needed by the homeless population exclusive of the chronically homeless.

Homeless Population Objective 31 (HP-31): Maintain the Central Access Point (CAP) program for families to enable homeless families to gain access to emergency shelter or family homelessness prevention services.

Homeless Population Objective 32 (HP-32): Expand the Central Access Point (CAP) program to enable the single homeless individuals to connect with information and referral services.

PAST PERFORMANCE

Past performance issues are discussed throughout this plan.

CITY OF CINCINNATI FIVE YEAR STRATEGIC PLAN

The mission of this plan is to provide strategic guidance for the City of Cincinnati for the next five years in the areas of housing, non-housing community development, homeless, and non-homeless special needs populations. The development vision and overall development goal are provided in the *2010-2014 Consolidated Plan Recommendations* section of this plan (page 4).

GENERAL QUESTIONS

GEOGRAPHIC AREA FOR HOUSING AND OTHER COMMUNITY DEVELOPMENT ACTIVITIES

Consolidated Plan activities will address needs City-wide, with funding targeted to low- to moderate-income individuals and families.

Population Characteristics

Following is a discussion of the City-wide and neighborhood population characteristics, including total population, number of households and families, race and ethnicity, and income and poverty status. The most current data available to assess the needs addressed by the Consolidated Plan is from the 2000 U.S. Census. More current information has been included when available.

Total Population

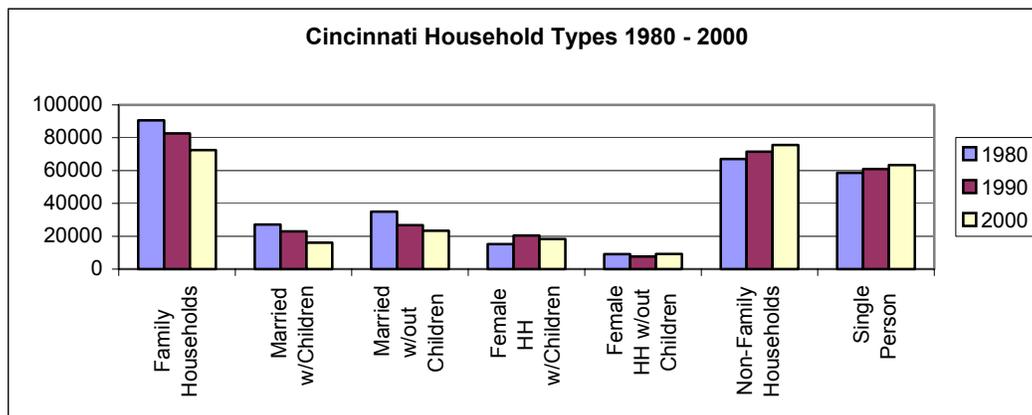
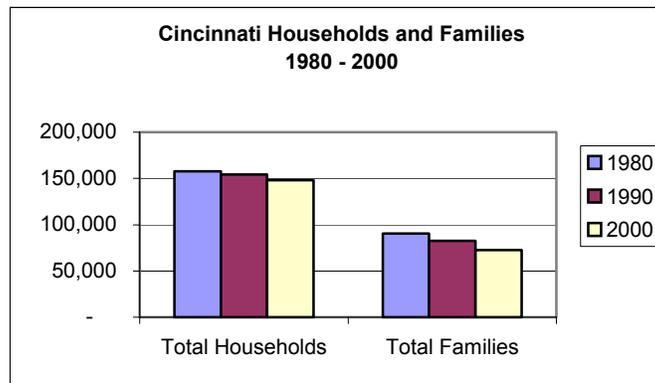
Between 1980 and 2000, Cincinnati's population dropped 14%. The loss was most critical in low- and moderate-income (LMI) neighborhoods due to the substantial decrease in residents and tax revenue. All neighborhoods in Cincinnati were losing residents, specifically those under the age of 25. Overall, the City has been losing family households and gaining female heads of households, non-family households, and single-person households.

The trend of population decrease has reversed in recent years. Based on U.S. Census Bureau estimates, the population of the City increased between 2000 and 2007 from 331,285 to 332,458. A recent report prepared by Social Compact, Inc. in 2007, *Cincinnati Neighborhood Market DrillDown: Catalyzing Business Investment in Inner City Neighborhood*, also found that the population of Cincinnati had increased since 2000.

Households and Families

The total number of households in the City of Cincinnati has decreased 6% in the last twenty years. The number of total families in the City has decreased more dramatically. The number of families has dwindled 20% since 1980 (from 90,644 to 72,496), with the largest loss experienced of married parents, which has decreased 41%. Subsequently, the number of female-headed households with children has increased 20%.

Cincinnati Households and Families, Household Types



Race and Ethnicity

The racial statistics that are used in the following analysis were gathered from U.S. Census data collected from 1980, 1990, and 2000. For the first time in Census history, the 2000 racial classification was based on self-identification. People could classify themselves as members of one or more races. The 2000 Census also considered ethnicity to be separate from race. People of Hispanic origin could also align themselves with a racial category. It must be noted that this change in reporting inhibits 2000 data from being directly compared to that of previous years.

The 2000 Census identified Cincinnati's most predominant races as African American and White. Whites comprise the majority of the City's population at nearly 53%, while African Americans comprise nearly 43% of the City's population, making them the largest minority population in Cincinnati. Cincinnati's Hispanic and Latino population is the fastest growing minority group in the City. They comprise nearly 2% of the total population.

Cincinnati's White Population

In the past decade (from 1990 Census to 2000 Census) the White population in Cincinnati has been decreasing. The neighborhoods of California, Hyde Park, Linwood, Mt. Adams, Mt. Lookout, Mt. Lookout-Columbia Tusculum, Mt. Washington, Sayler Park, and West Price Hill all have White concentrations of 90% or more. Sixteen of Cincinnati's 48 Statistical Neighborhood Areas have a White concentration of 75% or more.

Appalachians in Cincinnati

Cincinnati has a significant proportion of residents that began migrating from Appalachia in the 1960s in hope of finding opportunity. Being poor, many Appalachians originally settled in Over-the-Rhine and formed a large ethnic enclave with complex social networks; however, as individuals gained education and economic prosperity, many migrated outward, leaving Over-the-Rhine as a primarily African American community.¹ In more recent decades Appalachian migration to Cincinnati has slowed, but it continues to comprise the largest immigrating population into Cincinnati.

Appalachians are historically characterized as a predominantly poor group with large households and high drop out, teen pregnancy, and unemployment rates; however, tracking statistical data for the group is difficult because Appalachians are very hard to identify. The Census does not track 'Appalachian' as an ethnicity, nor do all individuals from Appalachia identify themselves as Appalachian. Even lower is the number of Appalachian descendants who categorize themselves as such.

A study entitled, "The Social Areas of Cincinnati: An Analysis of Social Needs" used six criteria to identify the neighborhoods in which Appalachians reside. The study suggests that Appalachian neighborhoods must meet the following criteria: 1) greater than 16% of families living below the poverty line, 2) less than 39% African American, 3) less than 76% of persons 25 years and older are high school graduates, 4) more than 15% of the persons 16-19 years old who are not in school, are not high school graduates, 5) more than 31% of the persons 16-19 years old are jobless (persons unemployed plus persons under 65 years not in the civilian labor force), have more than 3.1 persons per family on average.

Advocates and scholars have acknowledged ten of Cincinnati's Statistical Neighborhood Areas as being large Appalachian communities. They are Camp Washington, Carthage, the East End, East Price Hill, Linwood, Lower Price Hill, Northside, Riverside-Sayler Park, Sedamsville-Riverside, and South Fairmount, with the largest concentrations in Lower Price Hill, Northside, Camp Washington and the East End. All Appalachian neighborhoods are LMI eligible.

While the neighborhoods that produced the City's highest unemployment and drop out rates were Appalachian communities, a recent study suggests that poverty, unemployment, and high school drop out rates among Appalachians are declining: "The vast majority of Appalachians in the metropolitan area are not poor, not on welfare, and are not high school

¹ The Appalachian population in Cincinnati is comprised of both whites and African Americans; however, the presented data only represents the white portion of the population because they are easier to identify. Most African American Appalachians align themselves with the African American population because they are larger, better mobilized, and have a more well-developed support system.

dropouts. Most own their homes and have relatively stable families. They are a predominantly blue-collar group. About 10 percent hold managerial and professional jobs.”²

Cincinnati’s African American Population

The African American population in the metropolitan area increased rapidly from 1950 into the early 1960s in conjunction with the great northward migration of African Americans out of the American rural south. During that period of time, the number of African Americans increased nearly 3 percent a year.

After the Second World War, the larger African American population moved beyond the West End community where it had previously been confined by restrictive real estate practices. The City made several dramatic attempts at urban renewal, including the bulldozing of large sections of the West End. African American residents of the area had to move, first into Avondale and Evanston, and since then, more slowly into the City’s western communities. Since 1960, the increase in the size of the African American population has been a more modest 1.3 percent a year.

Currently twelve of Cincinnati’s 48 Statistical Neighborhood Areas contain a high concentration of African American minorities. These communities have African American population of 75% or more. They are Avondale, Bond Hill, Evanston, Fay Apartments, Kennedy Heights, North Fairmount-English Woods, Over-the-Rhine, Roselawn, South Cumminsville-Millvale, Walnut Hills, the West End, and Winton Hills.

Cincinnati’s Hispanic and Latino Population

The City of Cincinnati’s Hispanic and Latino population is the fastest growing minority group. The presence of Hispanics and Latinos has almost doubled in the past ten years (from 0.66% of the total population to 1.28%).

The population is dispersed across the City. Westwood currently houses the largest Hispanic/Latino population of 334 individuals who comprise less than 1% of the neighborhood’s total population. Lower Price Hill contains the largest concentration of Hispanics at nearly 11%. The next highest concentration of Hispanics is 2.24% in Mt. Airy.

Nearly 73% of Hispanics and Latinos in Cincinnati are citizens of the United States. The majority of Hispanics have at least some college; most have a Bachelor’s degree or higher. Seventy-one percent of respondents identified that they speak only English or speak English “very well.” Only 6.35% (primarily the older Hispanic residents) do not speak English at all. The majority of the adult population is between the ages of 22 and 39, and the majority of the children are under the age of nine. The median age is 26.2 years old. Households are typically 2 person families or adults living alone. The number of family and non-family households are generally even (48% family households, 52% non-family households). A vast majority of Hispanics in Cincinnati are renters (74%). The population’s primary means of transportation are personal vehicles. Twenty-three percent of Hispanics live below the poverty line, the majority of them are females.

² Maloney, Michael and Christopher Auffrey. 2004. *The Social Areas of Cincinnati: An Analysis of Social Needs*. Fourth Edition. A report sponsored by the University of Cincinnati’s School of Planning and the UC Institute for Community Partnerships (UCICP).

Racial Disputes

Race and ethnicity have been important topics in Cincinnati's history. Racial disputes between Irish and German residents were common during the 1800s. Disputes between African Americans and Whites were not uncommon in Cincinnati's history, but they became extremely prevalent in the latter half of the 1900s, with the most recent unrest occurring in 2001. In April, 2001 the shooting death of an unarmed African American teenager that was fleeing from Police sparked three days of protests and unrest in the City. While the destruction that resulted did not rival that of the race riots of the 1960s, it made all Cincinnatians painfully aware that racial discrimination and segregation are still significant issues that must be dealt with before Cincinnati can offer a decent quality of life for all residents.

Areas of Racial/Ethnic Concentration, 2000

SNA #	Statistical Neighborhood Area	Total No.	Black		Hispanic		White	
			No.	%	No.	%	No.	%
31	Avondale	16,298	14,839	91.05%	113	0.69%	1,116	6.85%
29	Bond Hill	9,682	9,032	93.29%	95	0.98%	402	4.15%
16	California	475	0	0.00%	5	1.05%	473	99.58%
8	Camp Washington	1,506	382	25.37%	32	2.12%	1,068	70.92%
27	Carthage	2,412	225	9.33%	41	1.70%	2,095	86.86%
3	CBD-Riverfront	3,189	1,246	39.07%	78	2.45%	1,780	55.82%
32	Clifton	8,546	1,283	15.01%	193	2.26%	6,425	75.18%
37	College Hill	15,269	8,476	55.51%	113	0.74%	6,388	41.84%
10	Corryville	3,830	1,904	49.71%	50	1.31%	1,610	42.04%
15	East End	1,692	223	13.18%	14	0.83%	1,439	85.05%
43	East Price Hill	17,964	3,869	21.54%	240	1.34%	13,287	73.96%
41	East Walnut Hills	3,630	1,209	33.31%	56	1.54%	2,286	62.98%
12	Evanston	7,928	6,996	88.24%	49	0.62%	735	9.27%
13	Evanston-East Walnut Hills	1,805	1,017	56.34%	16	0.89%	743	41.16%
7	Fairview- Clifton Heights	7,366	1,436	19.49%	137	1.86%	5,379	73.02%
39	Fay Apartments	2,453	2,326	94.82%	13	0.53%	79	3.22%
26	Hartwell	4,950	1,034	20.89%	80	1.62%	3,638	73.49%
21	Hyde Park	13,640	416	3.05%	199	1.46%	12,723	93.28%
25	Kennedy Heights	5,296	4,016	75.83%	60	1.13%	1,113	21.02%
20	Linwood	1,042	6	0.58%	13	1.25%	1,019	97.79%
42	Lower Price Hill	1,309	140	10.70%	142	10.85%	1,044	79.76%
23	Madisonville	10,827	6,521	60.23%	100	0.92%	3,865	35.70%
5	Mt. Adams	1,514	25	1.65%	17	1.12%	1,452	95.90%
38	Mt. Airy	9,710	4,514	46.49%	235	2.42%	4,684	48.24%
6	Mt. Auburn	6,516	4,755	72.97%	67	1.03%	1,551	23.80%
19	Mt. Lookout	3,236	20	0.62%	29	0.90%	3,143	97.13%
18	Mt. Lookout- Columbia Tusculum	3,081	158	5.13%	29	0.94%	2,862	92.89%
17	Mt. Washington	11,691	447	3.82%	123	1.05%	10,896	93.20%
30	North Avondale- Paddock Hills	6,212	3,256	52.41%	83	1.34%	2,772	44.62%
40	North Fairmount- English Woods	4,510	3,657	81.09%	44	0.98%	741	16.43%
34	Northside	9,389	3,637	38.74%	97	1.03%	5,425	57.78%
22	Oakley	11,244	935	8.32%	223	1.98%	9,846	87.57%
4	Over-the-Rhine	7,638	5,876	76.93%	172	2.25%	1,482	19.40%
24	Pleasant Ridge	8,872	3,158	35.60%	117	1.32%	5,378	60.62%
1	Queensgate	641	465	72.54%	11	1.72%	155	24.18%
47	Riverside-Sayler Park	1,451	168	11.58%	6	0.41%	1,241	85.53%
28	Roselawn	6,806	5,245	77.06%	47	0.69%	1,337	19.64%
48	Sayler Park	3,233	74	2.29%	25	0.77%	3,091	95.61%
46	Sedamsville-Riverside	2,223	207	9.31%	14	0.63%	1,921	86.41%
35	South Cumminsville- Millvale	3,914	3,696	94.43%	29	0.74%	136	3.47%
41	South Fairmount	3,251	1,479	45.49%	75	2.31%	1,556	47.86%
9	University Heights	8,753	1,616	18.46%	141	1.61%	5,745	65.63%
11	Walnut Hills	7,790	6,555	84.15%	71	0.91%	1,038	13.32%
44	West Price Hill	17,115	1,223	7.15%	182	1.06%	15,406	90.01%
2	West End	8,115	7,066	87.07%	119	1.47%	850	10.47%
45	Westwood	35,730	11,744	32.87%	334	0.93%	22,370	62.61%
36	Winton Hills	5,204	4,524	86.93%	48	0.92%	566	10.88%
33	Winton Place	2,337	1,080	46.21%	53	2.27%	1,141	48.82%
	TOTAL	331,285	142,176	42.92%	4,230	1.28%	175,492	52.97%

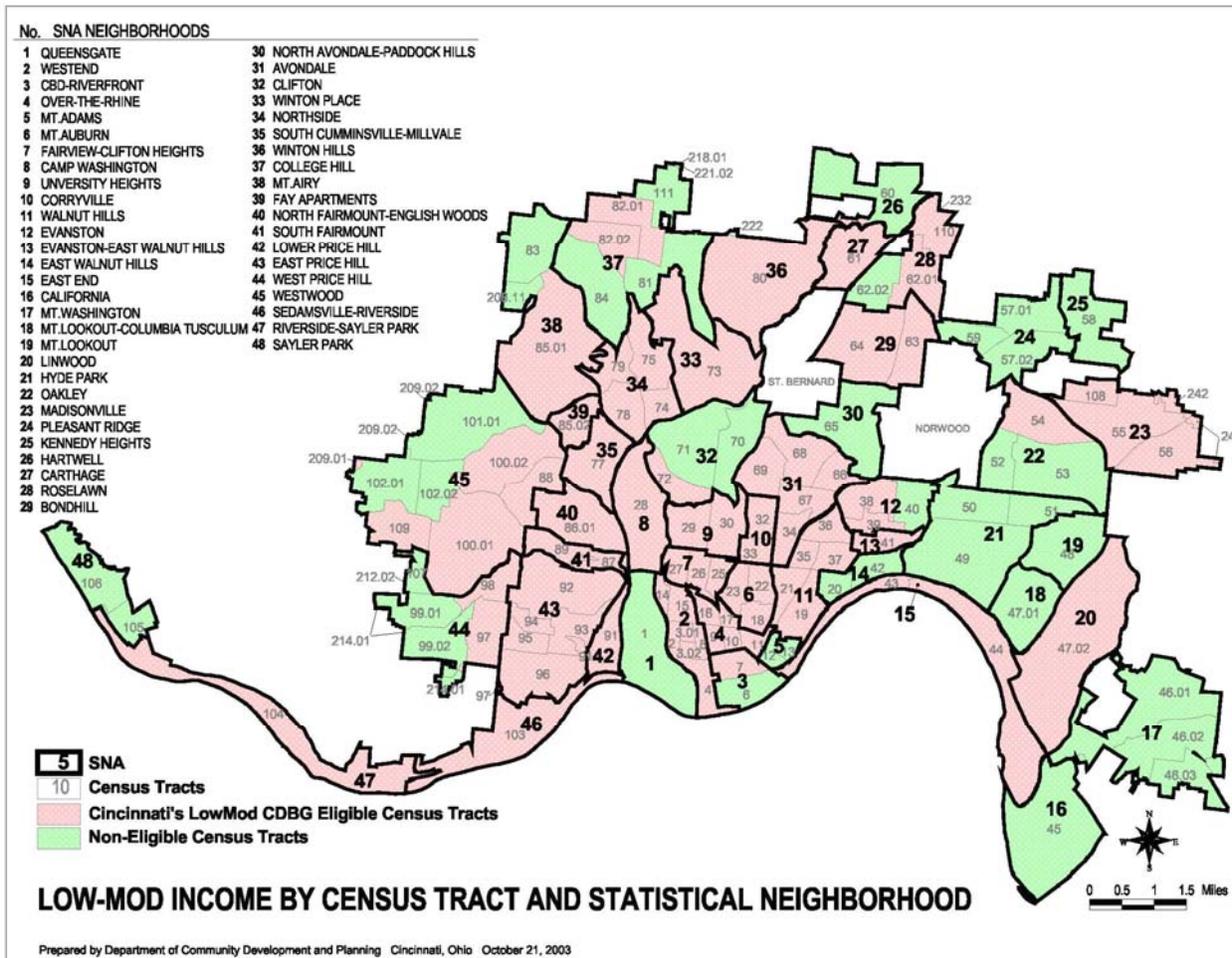
* Concentrations of 75% or greater are highlighted. Percentages do not total 100% because not all race classifications are included (American Indian and Alaska Native alone; Asian alone; Native Hawaiian and Other Pacific Islander alone; some other race alone; or Two or more races not included).

Income and Poverty

The 2000 Census revealed that the City's median household income had increased to \$29,493 in 1999. In 2000, 69,722 persons and 13,227 families were living below the poverty line. Unfortunately, poverty still plagues a large portion of Cincinnati's population. Between 2000 and 2007, the poverty rate in the City has increased. In 2000 the poverty rate was 21.5 percent. In 2007 it had jumped to 25.7 percent (American Community Survey S1701 Poverty Status in the Past 12 Months 2005-2007 3-Year Estimates).

Thirty-two of the City's 48 Statistical Neighborhood Areas (SNAs) are LMI eligible. LMI eligibility is defined as having 51% or more residents living at 80% or below the area's median income (AMI). There are seven neighborhoods that are close to becoming LMI eligible. They are Clifton, College Hill, East Walnut Hills, Hartwell, Kennedy Heights, Mt. Washington, and Saylor Park. These neighborhoods have at least 45% of residents qualifying as LMI individuals. Conversely, while Evanston-East Walnut Hills, Mt. Airy, Riverside-Saylor Park, West Price Hill, and Westwood are currently LMI eligible, the percentage of their residents living at 80% AMI or below is less than the City average of 60.3%, and therefore these neighborhoods could improve enough to lose LMI eligibility.

LMI By Census Tract and Statistical Neighborhood



Of all groups, African Americans are most likely to be living in poverty. Many predominantly African American neighborhoods also have high concentrations of poverty. Fay Apartments, North Fairmount-English Woods, Over-the-Rhine, South Cumminsville-Millvale, the West End, and Winton Hills all have high concentrations of African American residents and over 50% of the total neighborhood population lives in poverty. When defining high concentrations as neighborhoods with poverty levels that are higher than the City-average (21.5%), then 19 neighborhoods qualify which account for a more diverse racial population.

37,986 African American households, 33,984 White households, and 788 Hispanic households earn less than the City's median household income of \$29,493. Nearly 65% of all African American households earned less than the median household income, while approximately 40% of all White households and nearly 54% of all Hispanic households earned less than the median household income. For all households with the very lowest incomes, those earning less than \$10,000, 60% are African American while African American households make up only 40% of all households.

Race by Percent of Income Distribution, 2000

	Cincinnati	% of Total Households	White	% of Total White Households	Black	% of Total Black Households	Hispanic	% of Total Hispanic Households
Households: Total	147,979		83,830		58,579		1,479	
Less than \$10,000	26,690	18.04%	9,354	11.16%	16,189	27.64%	229	15.48%
\$10,000 to \$14,999	12,786	8.64%	6,173	7.36%	6,106	10.42%	155	10.48%
\$15,000 to \$19,999	12,013	8.12%	5,868	7.00%	5,703	9.74%	172	11.63%
\$20,000 to \$24,999	12,396	8.38%	6,589	7.86%	5,361	9.15%	116	7.84%
\$25,000 to \$29,999	11,102	7.50%	6,000	7.16%	4,627	7.90%	116	7.84%
\$30,000 to \$34,999	10,095	6.82%	6,062	7.23%	3,691	6.30%	79	5.34%
\$35,000 to \$39,999	8,561	5.79%	5,375	6.41%	2,816	4.81%	78	5.27%
\$40,000 to \$44,999	7,397	5.00%	4,672	5.57%	2,491	4.25%	93	6.29%
\$45,000 to \$49,999	6,214	4.20%	3,984	4.75%	1,960	3.35%	68	4.60%
\$50,000 to \$59,999	9,885	6.68%	6,768	8.07%	2,848	4.86%	87	5.88%
\$60,000 to \$74,999	10,566	7.14%	7,479	8.92%	2,680	4.58%	89	6.02%
\$75,000 to \$99,999	9,282	6.27%	6,745	8.05%	2,236	3.82%	74	5.00%
\$100,000 to \$124,999	4,359	2.95%	3,436	4.10%	771	1.32%	32	2.16%
\$125,000 to \$149,999	1,942	1.31%	1,454	1.73%	411	0.70%	28	1.89%
\$150,000 to \$199,999	2,025	1.37%	1,743	2.08%	195	0.33%	21	1.42%
\$200,000 or more	2,666	1.80%	2,128	2.54%	494	0.84%	42	2.84%

Persons Below Poverty Level in 2000 by SNA

NEIGHBORHOOD	Number of persons for whom poverty status is determined	Number of persons below poverty level;	% Persons Below Poverty Level
Avondale	15,386	5,785	37.60%
Bond Hill	9,571	1,999	20.90%
California	1,039	33	3.20%
Camp Washington	1,341	473	35.30%
Carthage	2,375	378	15.90%
CBD- Riverfront	2,004	531	26.50%
Clifton	8,406	1,378	16.40%
College Hill	15,912	1,780	11.20%
Corryville	3,571	1,222	34.20%
East End	1,652	294	17.80%
East Price Hill	17,555	4,414	25.10%
East Walnut Hills	3,635	566	15.60%
Evanston	7,882	2,201	27.90%
Evanston-East Walnut Hills	1,627	214	13.20%
Fairview/Clifton Heights	7,242	2,723	37.60%
Fay Apartments	2,265	1,373	60.60%
Hartwell	5,392	719	13.30%
Hyde Park	13,404	631	4.70%
Kennedy Heights	5,671	456	8.00%
Linwood	1,081	264	24.40%
Lower Price Hill	1,145	618	54.00%
Madisonville	11,300	1,446	12.80%
Mt. Adams	1,466	122	8.30%
Mt. Airy	8,846	1,346	15.20%
Mt. Auburn	5,850	1,519	26.00%
Mt. Lookout	3,192	82	2.60%
Mt. Lookout/Columbia Tusculum	3,120	162	5.20%
Mt. Washington	13,788	844	6.10%
North Avondale/Paddock Hills	5,010	608	12.10%
North Fairmount/English Woods	4,509	2,354	52.20%
Northside	9,385	2,104	22.40%
Oakley	10,983	836	7.60%
Over-the-Rhine	7,757	4,354	56.10%
Pleasant Ridge	9,297	989	10.60%
Queensgate	32	32	100.00%
Riverside-Sayler Park	1,522	327	21.50%
Roselawn	6,846	1,058	15.50%
Sayler Park	3,277	335	10.20%
Sedamsville/Riverside	1,991	388	19.50%
South Cumminsville/Millvale	3,901	2,118	54.30%
South Fairmount	3,267	1,108	33.90%
University Heights	5,908	2,008	34.00%
Walnut Hills	7,451	2,767	37.10%
West End	7,880	4,163	52.80%
West Price Hill	18,043	2,178	12.10%
Westwood	35,508	5,151	14.50%
Winton Hills	5,345	3,400	63.60%
Winton Place	2,358	228	9.70%
CITY	325,988	70,079	21.50%

GEOGRAPHIC AREA FOR HOMELESS ACTIVITIES

The Homeless Section of the 2010 Consolidated Plan has been developed for both the City of Cincinnati and Hamilton County, Ohio as part of the Continuum of Care for the Homeless (CoC) program of the combined jurisdictions. The CoC process is managed jointly with the City of Cincinnati and Hamilton County.

The Cincinnati EMSA includes 15 counties: five in Ohio, seven in Kentucky, and three in Indiana.

BASIS FOR INVESTMENT ALLOCATION AND PRIORITY ASSIGNMENT

The assignment of priority need levels is based on City-wide development objectives established through an evaluation of City policies and the public participation in the planning process. The basis for assigning priority levels for housing (page 49), homeless (page 75), and community development (page 89) are detailed throughout this plan.

Basis for Homeless Allocation

The Continuum of Care (CoC) process is a single, coordinated and inclusive process for priority setting and decision making. Annually, funding is applied for from HUD and received directly by the applicant organizations. All organizations who provide housing and/or services for the homeless within the jurisdiction participate in the CoC process (40 plus agencies, 200 different programs) In addition, 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 and in the assignment of relative priority for the purpose of the annual CoC application to HUD.

The Emergency Shelter Grant fund 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. Applications for ESG funds are reviewed and community decisions on allocations are made. Allocation recommendations are forwarded to the City of Cincinnati's Office of Budget and Evaluation for inclusion in the annual budget presented to City Council for final approval. In 2010, there will be changes to the Emergency Shelter Grant allocation process in response to recently passed federal legislation which will significantly change the nature of the funding. The Emergency Shelter Grant becomes the Emergency Solutions Grant and emphasizes the use of funding for homelessness prevention and rapid rehousing, in addition to current ESG activities.

The HOPWA fund allocation process is an inclusive process of the HIV/AIDS community. To allocate funds in the Greater Cincinnati EMSA, an annual HOPWA Advisory Committee is convened which includes state HOPWA officials, Ryan White representatives, provider applicants, consumers, and advocacy organizations.

The Cincinnati EMSA includes 15 counties: five in Ohio, seven in Kentucky, and three in Indiana. The estimate of each county's need is determined by assessing the number of HIV/AIDS cases as a percentage of the total. This estimation of need is then applied as a guide for allocating funds. Since there is no Indiana sponsor agency, the Indiana portion is typically allocated to the Kentucky or Ohio agency that has committed to serving Indiana clients. Applications for HOPWA funds are reviewed and community decisions on allocations are made. Allocation recommendations are forwarded to the City of Cincinnati's Office of

Budget and Evaluation for inclusion in the annual budget presented to City Council for final approval.

OBSTACLES TO MEETING UNDERSERVED NEEDS

Housing and Other Community Development Underserved Needs

As this plan will demonstrate, the need for housing, community development, and quality of life services and activities that are used to assist those in need, especially low- and moderate-income individuals, families, and neighborhoods, is tremendous. The greatest obstacle to serving underserved needs is funding. While the City has programs to address the full range of underserved needs, the amount of funding available for those programs is insufficient to produce outcomes that ensure the basic statutory goals of providing decent housing, a suitable living environment, and expanded economic opportunities are met for all Cincinnati residents and businesses, especially those with the most need.

Homeless Underserved Needs

The lack of enough permanent supportive housing and the lack of funding to provide adequate services to move persons out of homelessness remain obstacles to meeting the needs of the underserved.

MANAGING THE PROCESS (91.200 (b))

LEAD AGENCY

The Department of City Planning and Buildings, in collaboration with the Department of Community Development and the Office of Budget and Evaluation, has overseen the development of the Consolidated Plan.

The Office of Budget and Evaluation within the City Manager's Office administers the City's Consolidated Plan grants. In 2010 individual projects will be administered by the following City Departments or through qualified sub-recipients selected by them: Department of Community Development, the Finance Department, the Law Department, the Parks Department, the Department of Public Services, and the Health Department.

The lead entity for overseeing the development of the homeless section of the Consolidated Plan is the Cincinnati/Hamilton County Continuum of Care for the Homeless, Inc. (CoC, Inc.). The CoC, Inc. is responsible for facilitation of the year-round planning, coordination and program implementation processes for homeless housing and services within the jurisdiction and facilitation of the annual grant application process to HUD and other collaborative grant initiatives. The City of Cincinnati assumes primary responsibility for funding/contracting with the CoC, Inc. to provide planning, implementation and oversight.

PLANNING PROCESS, PUBLIC PARTICIPATION, AND CONSULTATIONS

The Consolidated Plan process requires consultation with public and private agencies that provide assisted housing, health services, and social service agencies including those providing services to children, elderly persons, homeless persons, persons with disabilities,

persons with HIV/AIDS and their families to ensure that the Consolidated Plan is a comprehensive document that addresses statutory purposes.

In April of 2009, City Staff held five focus groups open to the public to discuss the following issues addressed by the Consolidated Plan:

- Affordable Rental Housing
- Community Development Corporation (CDC) Programs and Activities
- Accessibility Issues
- Cincinnati Metropolitan Housing Authority (CMHA) Housing Programs
- Affordable Homeownership (including home repair and foreclosures)

The focus groups provided an opportunity for City Staff from the Department of City Planning and Buildings, the Department of Community Development, and the Office of Budget and Evaluation to receive input from service providers and advocates on the needs and opportunities for various issues addressed in the Consolidated Plan. A summary of focus group input is included as an attachment.

Preliminary housing, economic development, and quality of life goals and objectives were presented to the newly formed Human Services Advisory Committee/Community Development Advisory Board (HSAC/CDAB) at their June 4, 2009 meeting for review and comment. Recommendations in the Consolidated Plan incorporate the HSAC/CDAB feedback.

Consolidated Plan updates and preliminary housing, economic development and quality of life goals and objectives were also reviewed by Affordable Housing Advocates (AHA). AHA is a group of housing providers, advocates, and consumers dedicated to the goal of ensuring good, safe, accessible, and affordable housing for all people in Southwest Ohio. AHA offered comments on the preliminary goals and objectives (see attached). Several of the AHA comments address program priorities and program activity levels. These comments will be considered as priorities and program activities are developed. Other AHA comments have been addressed in the recommendations contained in this report. Recommendations were also reviewed by the Metropolitan Area Religious Coalition of Cincinnati (MARCC) at their September 9, 2009 meeting.

For the first time in our region, a plan for ending homelessness used actual data of homeless persons in the community. In 2008, a Steering Committee and five subcommittees consisting of local experts in the homeless services field, local funders, community stakeholders including representatives of service providers, government agencies, NGO's, businesses, and faith-based organizations, convened to undertake a comprehensive planning approach for homeless individuals. The recommendations of the Steering Committee, or the Homeless to Homes plan, are incorporated into the Homeless sections of the 2010 – 2014 Consolidated Plan that pertain to homeless individuals.

The process included two "homeless think tanks", focus groups designed exclusively to empower the homeless to provide input on what works/what needs to change in the community. One homeless think tank is conducted annually as a part of the general CoC process, but two additional think tanks were convened especially for homeless individuals for the purposes of the Homeless to Homes plan.

Separately, the Family Shelter Partnership Program (FSPP) undertook its own planning process, the results of which have likewise been incorporated into the Homeless Section of the 2010 – 2014 Consolidated Plan.

The Cincinnati/Hamilton County CoC uses an inclusive, community process to set local priorities and allocate HUD funding for new and renewal programming. This process has been inclusive of social service agencies serving the homeless or addressing related issues (e.g. poverty), Hamilton County Job and Family Services (Adult Protective Services, Child Protective Services, etc.), all local Family Shelters which serve homeless households with children, agencies which provide Permanent Supportive Housing (to those who are homeless and disabled), and local HIV services organizations (Stop AIDS, Caracole, etc.)

Citizen Participation (91.200 (b))

SUMMARY OF CITIZEN PARTICIPATION PROCESS

A public hearing on the 2010 Requested Consolidated Plan Budget and 2010-2014 Consolidated Plan was held in City Council Chambers on September 24, 2009, to receive citizen input on proposed resource allocations for 2010 and to discuss the new five year plan. A notice of the public hearing appeared in the Cincinnati Enquirer, the newspaper of general circulation, on September 11, 2009. In addition, notice of the public hearing was mailed or e-mailed to all 52 of the City's neighborhood Community Councils on September 16, 2009, and run in the City Bulletin on September 22, 2009. The meeting was also advertised and broadcast on the City's CITICABLE local access channel. The Requested Budget was been posted on the City's web site since September 15th at the following address: <http://www.cincinnati-oh.gov/cmgr/pages/-12848-/>.

The public hearing was held in City Hall, which is an accessible facility. Other accommodations for sight or hearing-impaired persons and for non-English speaking persons were available if requested.

As of September 24, 2009, the City published the 2010 Action Plan/Requested Consolidated Plan budget for a 30-day comment period. The Proposed Consolidated Plan Budget is made available for citizen review online at: <http://www.cincinnati-oh.gov/cmgr/pages/-12848-/>, and in the Office of Budget and Evaluation, City Hall, 801 Plum Street, Cincinnati. A paid advertisement notifying the public of the availability of the 2010 Action Plan/Requested Consolidated Plan budget was run on September 11, 2009 in the Cincinnati Enquirer, a widely distributed newspaper. The 2010 Action Plan/Requested Consolidated Plan and proposed five year Consolidated Plan was made available to all interested parties, in both electronic and paper format, who request one by calling the Office of Budget and Evaluation, (513) 352-3232, or at the public hearing.

In finalizing its 2010 Consolidated Plan Budget, the City considered comments received from citizens at the public hearing or in writing 30 days after the publication of the 2010 Action Plan/Consolidated Plan budget. The City has provided a summary of these views and a summary of the reasons such views or comments are or are not accepted below.

SUMMARY OF CITIZEN COMMENTS

As stated above, a public hearing was held in City Council Chambers on September 24, 2009, to receive public comments on the Requested Consolidated Plan Budget. That budget

was available for review and comment on the City's web site beginning September 15, 2009. Opening comments and introductions were made by Oren J. Henry, Community Development Administrator. Those in attendance were informed of the types and amounts of HUD funding (CDBG, HOME, ESG, and HOPWA) expected to be available in 2010, and the kinds of projects that may be undertaken with those funds. Five of the individuals in attendance spoke formally and their comments are as follows:

1. Ms. LaTonya Springs representing Housing Opportunities Made Equal provided written comments and spoke to highlight the lack of accessible housing in Cincinnati. She stated because of the age of Cincinnati's housing stock, few properties are accessible to people with disabilities. She stated the City uses CDBG funds to provide accessibility modifications for homeowners, but not for renters. She stated the City's recently completed Analysis of Impediments included recommendations that accessibility modifications be provided for renters. She urged the proposed Action Plan include funding for this activity.
2. Ms. Rina Saperstein representing Affordable Housing Advocates (AHA) provided written comments on the following topics. Cincinnati has an affordable housing gap that must be addressed. The City should set a goal of 500 more affordable housing units per year. The City should preserve and improve existing affordable rental housing, and protect low and moderate income homeowners from foreclosure. Should work to end homelessness but not support the ban on housing programs in Census Tract 9. Promote accessible housing, meaning use of green building technologies, Universal Design principles, and increase accessibility for people with disabilities.
3. Ms. Kat Lyons representing the Center for Independent Living Options thanked the City for including many community organizations in focus groups for the writing of the five-year Consolidated Plan this year. Ms. Lyons provided a written statement and stated verbally as well that there is a shortage of accessible, affordable, and integrated housing in Cincinnati that leads to the unnecessary institutionalization of people of all ages. She recommended a program to provide free modifications, with the landlord's permission, to enable people with disabilities to stay in or return to their own homes.
4. Ms. H.F. (Pat) Coyle representing the Metropolitan Area Religious Coalition of Cincinnati provided written comments with two goals and stated the City should expand the diversity and quality of the housing stock. That development and retention of affordable rental units needs to be given priority over home ownership. She supported the Homeless to Homes report including increasing transitional housing, permanent supportive housing, emergency shelter, and housing for disabled people. A quality of life goal promotes sustainable neighborhoods through elimination of blighting influences and improved health and safety.
5. Ms. Alice Skirtz provided written comments and verbal comments arising from her work with homeless families in the city as the Case Work Supervisor for the Family Shelter Partnership Program under the auspices of Bethany House Services. She recommended including the Homeless to Homes recommendations in the Consolidated Plan, but to include homeless families as well as singles. She also recommended for families, especially poor and homeless families, priority in the Consolidated Plan and the Action Plan should be shifted from home ownership to retention and development of affordable rental housing.

No additional formal comments were made by citizens at the meeting. The City did receive other comments outside the formal hearing process including the following:

1. An e-mail, dated September 30, 2009, was received from Mr. Jim McNulty, Westwood Neighborhood, requested allowing the maximum amount - 30% or \$3.5 million of CDBG funding to the purpose of slum and blight removal - specifically for the acquisition and demolition of blighted multi-family building, for each year during the next cycle, 2010-2014. He stated they have an urgent need to remove blight from neighborhoods, and the need far outstrips the current resources.
2. An e-mail, dated October 14, 2009, received from Mr. John Sess, representing the Westwood Civic Association, stated the Requested CDBG budget allocated less than the 30% available for blight removal in the City of Cincinnati. He stated the Westwood Civic Association requests the FULL 30% be spent for blight removal, specifically targeting multi-unit apartment buildings which are in disrepair. He continued that Westwood's single largest problem is fighting slumlords who receive tax dollars to perpetuate blight in the Westwood Neighborhood. He asked the Administration reconsider allocating the full 30% of funding available for blight removal.

SUMMARY EFFORTS TO BROADEN PUBLIC PARTICIPATION

Citizen participation is a major component of the Consolidated Planning process, and of the City's overall budget process. In addition to the above public hearing and public comment processes described above, the City encourages citizen participation in the following ways.

Community Priority Requests - Neighborhoods

For neighborhood needs, the City asks its fifty-two community councils what their priorities are for the City Budget on a biennial basis. City staff from the Department of Community Development and the Department of Planning and Buildings are available to assist neighborhoods with this process. Additionally, in 2009 a coalition of five civic sector organizations provided additional assistance in preparing requests to a pilot group of neighborhoods. The civic sector organizations included: the Cincinnati Association, Citizens for Civic Renewal, the League of Women Voters, Urban League, and Women's City Club. The City then considers these priorities in putting together its Operating, Capital and Consolidated Plan budgets.

Continuum of Care Process – Homeless Housing

Annually, the City of Cincinnati sponsors a professionally facilitated Continuum of Care process that includes the Hamilton County Community Development Department and the Greater Cincinnati Coalition for the Homeless. Participating are nonprofit providers of housing and services, state and local governments/agencies, private sector representatives, housing developers, foundations and other community organizations, as well as homeless or formerly homeless persons. The outcome of the process is an application for Continuum of Care Homeless Assistance funding in which the participants reached a consensus on the needs, gaps and relative priorities for grant funding.

Citizen Advisory Committees

In addition to neighborhood participation, the City's budget process has several citizen advisory groups that are involved in reviews of budget proposals for City funding.

- Human Services Advisory Committee and Community Development Advisory Board. Historically the City has had a Community Development Advisory Board (CDAB) which evaluated program requests and made recommendations in coordinating City programs with service providers. Additionally the Human Services Advisory Committee (HSAC) reviewed requests for human services and human service facility renovations. The City Council and the Administration have been working to revise this process throughout 2009. An interim combined HSAC/CDAB board was in existence during part of 2009. The Administration provided this board with the 2010 Requested Budget and an opportunity to comment on the Requested Budget. No formal review process by this interim HSAC/CDAB board took place.
- HOPWA Advisory Committee. Since the City of Cincinnati became a HOPWA entitlement grantee in 1998, the City has utilized an ad hoc advisory committee comprised of representatives of the principal agencies serving persons with HIV/AIDS, and advocacy groups, within the twelve-county eligible metropolitan statistical area (EMSA). The HOPWA Advisory Committee makes recommendations to the City.
- Fair Housing Committee. An update to the combined City and Hamilton County's Impediments to Fair Housing study was completed in May 2009 as part of the preparation of the City's 2010-2014 Consolidated Plan. A combined committee composed of representatives of Hamilton County and the City are reviewing the updated Impediments to Fair Housing Study recommendations, reviewing available information, and various implementation strategies are being considered.
- Neighborhood Business Districts. Proposals for funding for neighborhood business district (NBD) improvements are made through a special process managed by the Department of Community Development. Request-For-Proposal packages are mailed to community leaders in early March. Information may be obtained from the Department of Community Development by calling (513) 352-6146. NBD proposals are reviewed by the Cincinnati Neighborhood Business Districts United (CNBDU), an association of NBD members. Their recommendations are made to the Department of Community Development, which in turn requests funding from CDBG or City Capital resources.

Consolidated Plan Amendments

A substantial amendment to the Consolidated Plan Budget requires public notice in the City Bulletin and a newspaper of general circulation with a 30-day opportunity to comment, and a public hearing before the City Council. The City considers all comments from citizens prior to the submission of the substantial amendment, and explains reasons for accepting or not accepting such comments as part of its amendment process.

A substantial amendment is defined to include the following situations:

- major budget adjustments related to final resources;
- reallocation of program dollars exceeding \$3,000,000, except for the annual sunset process;
- a proposed change in the allocation or selection criteria for generic programs such as loan programs or competitive development programs; and
- proposed uses of HUD 108 Loan Authority or CDBG Float loans.

A public hearing before the City Council will be held, if necessary, to consider the amendment to the Consolidated Plan related to the allocation of final resources.

In addition, a public hearing will be held at any other time during the year concerning any substantial amendment to the Consolidated Plan. A notice of the public hearing will appear in a newspaper of general circulation and in the City Bulletin approximately 15 days before the hearing. In addition, community organizations will be sent notices by surface mail or e-mail. The public hearing will be held in City Hall, which is an accessible facility. Other accommodations for sight or hearing-impaired persons and for non-English speaking persons will be made upon request.

Performance Reviews

Citizens are encouraged to comment on the performance of city and nonprofit agencies in implementing Consolidated Plan programs and projects and in meeting program objectives.

While the Consolidated Plan documents the proposed use of funds, the Consolidated Annual Performance Evaluation Report (CAPER) identifies the progress and performance of projects, programs and services funded during the prior program year. The CAPER is available in March annually. At the beginning of March, the Office of Budget and Evaluation will publish a notice in the City Bulletin and in a general publication newspaper that the performance reports are available and locations where they may be reviewed. A link to the City's web site where the draft CAPER is posted is provided in the advertisement. Citizens may request paper or electronic copies by calling the Office of Budget and Evaluation (513) 352-3232. Comments by citizens on the City's performance will be considered by the City and included in the submission of the Performance Report to HUD.

Access to Records

Citizens may have reasonable and timely access to information and records relating to Cincinnati's Consolidated Plan and its use of funds for the preceding five years. Consolidated Plan program history, in the form of previous reports, CDBG Consolidated Plans, and CDBG Grantee Performance Reports can be reviewed in the Office of Budget and Evaluation, Rm. 142, City Hall, between the hours of 8:00 A.M. and 4:00 P.M., or by calling (513) 352-3232. The adopted Consolidated Plan summary is available on the City's web site (www.cincinnati-oh.gov) at this link: <http://www.cincinnati-oh.gov/cmgr/pages/-12848/>. Printed copies are available for review in Room 142 of City Hall and in the Public Library of Hamilton County.

Technical Assistance

Community groups may receive assistance with proposals for potential Consolidated Plan program funding through the following resources. All requests that fall outside of the established funding process should be submitted no later than May 15 annually in order to be considered in department funding requests.

City Departments:

Department of Community Development:
Housing, Human Services, and Neighborhood
Economic Development:

Michael Cervay

Director, (513) 352-6146

Community Non-profits:

Neighborhood Network, Lois Broerman,
(513) 421-3954; (513) 921-5842

General Eligibility Questions

Oren J. Henry, (513) 352-6264

Susan Pratt, (513) 352-6281

Cincinnati Development Fund

(Pre-development grants for non-profits),
Jeanne Golliher, (513) 721-7211

DISCUSSION OF COMMENTS NOT ACCEPTED

In response to citizen comments not accepted the City replies:

1. City Response #1

a. Accessibility:

Ms. LaTonya Springs spoke to highlight the lack of accessible housing in Cincinnati and need for CDBG funds to provide accessibility modifications for renters. She stated the City and Hamilton County's recently completed Analysis of Impediments update included recommendations accessibility modifications be provided for renters. The City has formed a working committee with Hamilton County to review the recommendations of the Analysis of Impediments update including recommendations on accessibility modifications for renters. Based on that review the City will determine if such a program is necessary and feasible, and may include during this Consolidated Plan period.

2. City Response # 2

a. Affordable Housing/End Foreclosure & Homelessness/Green & Universal Design:

Ms. Rina Saperstein said the City should set a goal of 500 more affordable housing units per year, preserve and improve existing affordable rental housing, protect homeowners from foreclosure, work to end homelessness but not support the ban on housing programs in Census Tract 9, and promote accessible housing, green building, Universal Design, and accessibility for people with disabilities. The City is working to provide affordable housing units within resources and with partners with workable plans. The City has programs to assist in preventing foreclosure and works

with local partners in ending homelessness. The City is embracing green building and Universal Design on an increasing basis. The City has formed a working committee with Hamilton County to review the recommendations of the Analysis of Impediments update including recommendations on accessibility modifications for renters. Based on that review the City will determine if such a program is necessary and feasible, and may include during this Consolidated Plan period.

3. City Response #3

a. Accessibility:

Ms. Kat Lyons stated there is a shortage of accessible, affordable, and integrated housing for renters. The City has formed a working committee with Hamilton County to review the recommendations of the Analysis of Impediments update including recommendations on accessibility modifications for renters. Based on that review the City will determine if such a program is necessary and feasible, and may include during this Consolidated Plan period.

4. City Response #4

a. Quality of Life:

Ms. H.F. (Pat) Coyle stated the City should expand the diversity and quality of the affordable rental housing stock and support Homeless to Homes report. The City continues to work to expand the diversity and quality of the affordable rental housing stock through the Rental Rehabilitation Program. The Homeless to Homes report is part of the 2010-2014 Consolidated Plan.

5. City Response #5

a. Affordable Housing and Homeless:

Ms. Alice Skirtz recommended including the Homeless to Homes recommendations in the Consolidated Plan, but to include homeless families as well as singles. She also recommended for families priority in the Consolidated Plan and the Action Plan should be the development of affordable rental housing. The Homeless to Homes report is part of the 2010-2014 Consolidated Plan and has an additional section on homeless families. The City continues to work to expand the diversity and quality of the affordable rental housing stock through the Rental Rehabilitation Program and other programs that assist in the development or stabilization of rental housing.

6. City Response First E-mail

a. Slum and Blight:

Mr. Jim McNulty, requested allowing the maximum amount - 30% or \$3.5 million of CDBG funding to the purpose of slum and blight removal - specifically for the acquisition and demolition of blighted multi-family building, for each year during, 2010-2014. City programs that qualify under the Slum and Blight national objective are recommended for funding

totaling \$2,716,262 in 2010, which is below the estimated cap of \$3.3 million. Funding for the Hazard Abatement Program specifically will total \$957,582 in 2010. In addition, the Hazard Abatement Program received \$2,381,533 in Neighborhood Stabilization Program funds in 2009, that are just getting underway. Due to resource limitations the City cannot recommend any additional funding for the Hazard Abatement Program. It is noted the City uses a number of strategies to address blighted properties. Concentrated Code Enforcement is funded at \$575,000 in 2010. The Strategic Program for Urban Redevelopment addresses abandoned properties and brownfields and is funded at \$625,000 in 2010. The Blueprint for Success program rehabilitates vacant houses for resale and is funded at \$250,000 in 2010 in CDBG funding and an additional \$200,000 in HOME program funds. The recently implemented CDBG-R Program is providing funding for Private Lot Abatement of \$214,466 specifically to clean up blight on lots, and the vacant American Can Building is receiving \$1.6 million to facilitate its redevelopment.

7. City Response Second E-mail

a. Slum and Blight:

Mr. John Sess, stated FULL 30% be spent for blight removal, specifically targeting multi-unit apartment buildings which are in disrepair. City programs that qualify under the Slum and Blight national objective are recommended for funding totaling \$2,716,262 in 2010, which is below the estimated cap of \$3.3 million. Funding for the Hazard Abatement Program specifically will total \$957,582 in 2010. In addition, the Hazard Abatement Program received \$2,381,533 in Neighborhood Stabilization Program funds in 2009, that are just getting underway. Due to resource limitations the City cannot recommend any additional funding for the Hazard Abatement Program. It is noted the City uses a number of strategies to address blighted properties. Concentrated Code Enforcement is funded at \$575,000 in 2010. The Strategic Program for Urban Redevelopment addresses abandoned properties and brownfields and is funded at \$625,000 in 2010. The Blueprint for Success program rehabilitates vacant houses for resale and is funded at \$250,000 in 2010 in CDBG funding and an additional \$200,000 in HOME program funds. The recently implemented CDBG-R Program is providing funding for Private Lot Abatement of \$214,466 specifically to clean up blight on lots, and the vacant American Can Building is receiving \$1.6 million to facilitate its redevelopment.

INSTITUTIONAL STRUCTURE (91.215 (i))

Several organizations are involved in the development of the Consolidated Plan/Action Plan. In addition, the majority of Consolidated Plan programs are implemented by private organizations which use City funding (including the General Fund) for programs that support Consolidated Plan objectives.

For the past several years the City has used CDBG funding to improve neighborhood capacity building and provide technical assistance. In 2009 the City increased its financial support for the community development corporation network by using up to 5% of the City's HOME funds to provide operating assistance to 7 community housing development organizations (CHDOs). The operating assistance is administered through the Community

Development Corporations Association of Greater Cincinnati (CDCA). The CDCA is the trade association in the Greater Cincinnati and Northern Kentucky area for Community Development Corporations (CDCs), housing service providers, financial institutions, community resources, and committed individuals.

Historically the City has had a Community Development Advisory Board (CDAB) which evaluated program requests and made recommendations in coordinating City programs with service providers. Additionally the Human Services Advisory Committee (HSAC) reviewed requests for human services and human service facility renovations. The City Council and the Administration have been working to revise this process throughout 2009. An interim combined HSAC/CDAB board was in existence during part of 2009. The Administration provided this board with the 2010 Requested Budget and an opportunity to comment on the Requested Budget. No formal review process by this interim HSAC/CDAB board took place for the 2010 Action Plan.

In 2009 the City Administration proposed combining the Economic Development Division that is part of the Office of the City Manager and a Business Development Division that is part of the Department of Community Development to form a Department of Economic Development. This proposal was not approved by the City Council so the following CDBG funded activities, Neighborhood Business District Improvement Program, Neighborhood Business District Property Holding Costs, Strategic Program for Urban Redevelopment/GO Cincinnati, Small Business Services and Technical Assistance, and the Small Business Loan Fund remain under the jurisdiction of the Department of Community Development.

In 2009, in accordance with HUD's new emphasis on fiscal coordination for Continuums of Care, our local CoC has established itself as a 501 (c) 3 organization to provide enhanced institutional structure for the jurisdiction. The new entity's name is the Cincinnati/Hamilton County Continuum of Care for the Homeless, Inc.

Recent audits conducted by the HUD Office of Inspector General (OIG) of the HOME Program has led the Department of Community Development to review its practices and procedures. The result is the Department is working to improve the effectiveness and efficiency across all programs including the HOME Program. The Columbus HUD Office provided the City with technical assistance through ICF International to assist with resolving issues and closing old projects while developing a policy/procedures manual. Coordination is being enhanced between the Department of Community Development, Law Department, Accounts and Audits and the Office of Budget and Evaluation through increased training, better written agreements, and more frequent and regular meetings on improving performance. It is anticipated that the use of the new, web based, Integrated Disbursement and Information System (IDIS) will speed up the flow of information to all staff and provide better data in evaluating program effectiveness. There is enhanced effort in monitoring activities and sub recipients in closing out old projects. New procedures are in place to improve the information retained in files and there is more use of electronic forms. Servicing of loans within the housing programs has been moved to a new servicing provider at lower cost and with greater efficiency.

In addition to the normal HUD programs the City administers, CDBG, HOME, ESG, and HOPWA, the City received various grants from HUD in 2009 to mitigate the effects of foreclosed properties, provide economic stimulus, and offer assistance to those likely to become homeless or who had recently become homeless. These grants were provided in the form of substantial amendments to existing programs in the 2008 Action Plan.

A substantial amendment for FY 2008 was submitted and approved for the Neighborhood Stabilization Program (NSP I) for \$8,361,592 of formula funds for the purpose of the redevelopment of abandoned and foreclosed homes and residential properties. The Department of Community Development is administering this program within its existing structure although this CDBG format like program requires the use of the HUD Disaster Recovery Grant Reporting (DRGR) system and procedures. This reporting system has distinct differences from the HUD IDIS system. The City is working with ten neighborhoods as partners to implement strategies to stabilize, demolish, rehabilitate, and redevelop abandoned and foreclosed homes. The HUD Office of Inspector General (OIG) has also conducted an audit of the Cincinnati NSP I Program that has led the Department of Community Development to review its planned practices and procedures in implementing this program.

In addition to the NSP I the City has also joined a consortium led by Hamilton County to apply for competitive NSP II funds. The City intends to follow a similar structure in the administration of these funds in Cincinnati if awarded in 2010 though Hamilton County will have lead responsibility.

A substantial amendment for the FY 2008 Action Plan was submitted and approved for the Homelessness Prevention and Rapid Re-Housing Program (HPRP) for \$5,339,182 of formula funds. The City of Cincinnati and Hamilton County plan for and administer homeless housing and services in a combined effort with the Cincinnati/Hamilton County Continuum of Care for the Homeless. The Homeless and Special Needs of both jurisdictions' Consolidated Plans reflect the work of the entire continuum effort. HPRP is blended into the current activities of the Continuum and is consolidated to ensure service to any eligible person/family within either jurisdiction. Reporting on accomplishments is made by the Continuum into the Homeless Management Information System (HMIS), along with required data by the City into IDIS. This program also requires registration and quarterly reporting at recovery.gov for its duration. The City established a team across several departments to administer the requirements of the recovery.gov reporting for all applicable grants.

A substantial amendment for the FY 2008 Action Plan was submitted and approved for the Community Development Block Grant Recovery Program (CDBG-R) for \$3,490,694 of formula funds. The funds using the CDBG framework are an effort to jumpstart the economy, by saving and creating jobs, and addressing long-neglected community challenges so communities can thrive in the future. In Cincinnati the funding is being used to help the economy in the areas of public services, neighborhood development, business development, streetscapes, drug elimination, and abatement of blight on private lots. The Department of Community Development, Department of Transportation and Engineering, Police Department, and Department of Public Services are administering this program within their existing structure and with community partners. Reporting will be using the web based IDIS, although this program requires the use of the HUD Recovery Act Management and Performance System (RAMPS) for tracking the environmental review status of each project activity. The RAMPS reporting system is new for use with CDBG type projects. In addition to IDIS, CDBG-R requires registration and quarterly reporting at recovery.gov for its duration. The City established a team across several departments to administer the requirements of the recovery.gov reporting for all applicable grants.

The CoC planning process is a coordinated, collaborative effort by the City of Cincinnati, Hamilton County, the Greater Cincinnati Coalition for the Homeless, and the CoC Working Groups under the umbrella of the 501(c)3 –Cincinnati/Hamilton County Continuum of Care for the Homeless, Inc. (CoC, Inc.). The CoC, Inc. is the lead agency registered with HUD for the CoC annual grant application process and is the entity responsible for the submission of

Exhibit 1. Over the course of the Consolidated Plan period this entity will also assume the responsibility for financial management of the grants pursuant to changes regulated by HUD.

A clear strength of the system is its inclusive nature. The **Continuum of Care (CoC)** process is a *single, coordinated and inclusive process* for priority setting and decision making. All organizations who provide housing and/or services for the homeless within the jurisdiction participate in the CoC process (40 plus agencies, 200 different programs) In addition, 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 and in the assignment of relative priority for the purpose of the annual CoC application to HUD.

Between October 2008 and March 2009, the CoC developed a new comprehensive plan for how to better serve homeless individuals in Cincinnati/Hamilton County. The Homeless to Homes Plan summarizes recommendations made by local and national experts in the homeless services field, local funders, and community stakeholders including representatives of service providers, government agencies, NGOs, businesses, and faith-based organizations. The process for developing the plan constituted the first time in our region that a plan for ending homelessness used actual data of homeless persons in the community; real numbers, real ages, and real special needs became a foundation for the work. Because this plan was created using a "blank slate" problem solving method, it reflects what the steering committee and working subcommittees believe are the best of what could and should happen for homeless single individuals in the community.

The plan represents a significant shift in the ways our community responds to those who are homeless. The Homeless to Homes report responds to the need for a new, comprehensive plan that changes how our community provides homeless housing and services, how homeless individuals are expected to respond, and how public and private funding systems can work cooperatively and with a clear emphasis to support the initiatives of this plan.

The prioritization of the Homeless to Homes recommendation is not yet complete, but the following recommendations are likely to be the first implementation steps, as they directly address gaps in the current system:

- Increase the number of Transitional Housing beds.
- Increase the number of Permanent Supportive Housing units.
- Development of a Central Access System to be used by homeless households to access emergency shelter, housing, and services.
- Decreasing the ratio of case managers to clients so as to provide a higher level of services.
- Restructure the current number of emergency shelter beds so as to better meet the needs of emergency shelter residents.
- Improve access to services through increased collaboration and coordination between CoC homeless services and the Mental Health and Recovery Services Board.
- Divert homeless people away from incarceration and toward transitional housing.

MONITORING (91.230)

The Office of Budget and Evaluation administers the City's Consolidated Plan grants. Administration includes the following functions:

- Reviewing all proposals for funding at the budget phase for eligibility with grant program requirements.
- Reviewing grant budgets in their entirety for compliance with program caps (CDBG) and program set asides (HOME CHDO requirements).
- Reviewing all activities at the implementation phase for compliance with grant requirements in conjunction with the implementing department and the City staff in the Law Department.
- Monitoring activities to ensure commitment of funds in a timely manner, in particular the Emergency Shelter Grants and CHDO commitments for HOME funds.
- Monitoring ongoing expenditures during the course of the program year to ensure program caps are not exceeded and that the CDBG program as a whole is in compliance with national benefit standards and timeliness standards.
- Monitoring achievement of plan goals and objectives through periodic and annual reports and through the budget review process.

Additional monitoring activities include:

The Action Plan and the CAPER include prior year performance as compared to five-year goals. Funding is reallocated as necessary to ensure needs are met.

Housing projects are monitored during construction and throughout the affordability period. City staff inspects units during construction and upon completion. A contractor ensures compliance with both housing codes and affordability requirements.

Subrecipients are required to submit quarterly performance reports to their City contract administrator. The contract administrator monitors through site visits on a periodic basis.

ESG, HOPWA, and Shelter Plus Care (SPC) grants are monitored by The CoC, Inc.

- Monthly ESG and HOPWA invoicing includes a review of dollars expended by provider agencies, matching spending to the approved budget allocations and to HUD allowable expenditures.
- ESG providers give to the City, via HMIS reports, a City demographic report that details persons served to IDIS data standards and provide proof of contracted service delivery.
- HOPWA providers provide an annual report to the City, with specific excerpts from the HOPWA APR reported according to activity funded.
- Annual on-site monitoring visits are conducted of each ESG, HOPWA, and SPC program by CoC staff. Monitoring tools used are calibrated annually with the HUD field office monitoring tools to ensure consistency with HUD requirements.

HUD Supportive Housing Program (SHP) grants are monitored by HUD field office staff. Locally, at least annually each SHP funded agency's Annual Progress Report is reviewed and monitored by the CoC, Inc. prior to submission to HUD.

PRIORITY NEEDS ANALYSIS AND STRATEGIES (91.215 (a))

As this plan will demonstrate, the housing, economic development, quality of life, homeless, and non-homeless special needs populations is tremendous. In addition to the demonstrated need and public input receive throughout the consolidated planning process, existing city policies also inform the priority given to each category of priority need. Following is a summary of these city policies.

Impaction Ordinance

The Impaction Ordinance (346-2001), passed by City Council in 2001, set City policy in the budgeting and expenditure of Community Development Block Grant (CDBG) and HOME Investment Partnerships Program funds and in the approval of low income tax credit projects to:

- Support homeownership through projects such as down payment assistance, emergency foreclosure assistance, lead abatement assistance, rehabilitation loans for owner-occupants, and the creation of new ownership units;
- Reduce the concentration of poverty through project such as HOPE VI and provide ramps to homeownership;
- Rehabilitate vacant and abandoned buildings;
- Preserve existing stock of affordable housing by supporting rehabilitation and upkeep projects;
- Provide supportive services to expand affordable housing opportunities outside of the City of Cincinnati;
- Improve affordable housing by giving priority to projects where four- or five-unit buildings are converted into more attractive and affordable buildings with fewer units and larger living spaces that meet modern living standards;
- Combat the abuses of absentee owners by giving priority to projects where the owner commits to occupy a dwelling within the project; and
- Oppose the construction of new publicly-assisted low-income rental units unless the construction reduces the concentration of poverty or are intended for occupancy by the elderly.

The Housing Advisory Council (HAC)

The HAC was directed by Cincinnati City Council to recommend and develop programs to address the rental needs of low-income families in Hamilton County, including the City of Cincinnati. Secondly, the HAC was charged with focusing on the identification of methods and programs to increase market rate rental and homeownership opportunities in the City of

Cincinnati. The recommendations of the HAC were adopted in 2004. These recommendations were:

1. Retention of single-family units for ownership by reducing the number of single-family units converted from homeownership units to rental units.
2. Tracking voucher concentrations and target high neighborhood or jurisdictional concentrations for reduction by offering incentives
3. Reduction of the number of homeowners negatively affected by predatory lending practices in order to prevent conversion of owner-occupied units to rental units and preserve the homes of owner-occupants
4. Improvement of community education and responsiveness to community concerns in order to break the stereotypical link between subsidized housing and crime and decay by: 1) improving citizen perceptions and acceptance of affordable housing, and 2) increasing acceptance and appreciation of diversity
5. Targeted rehabilitation of rental units through the creation of incentives for high-quality landlords to rent to low-income families
6. Dispersion of affordable rental units by increasing the number of affordable rental units in areas where few exist
7. Progressive enforcement of Housing Choice Voucher Program standards in order to improve housing for residents and improve perceived Program quality
8. Creation of a Housing Voucher Program Landlord Briefing Program in order to reduce landlord error and encourage landlords to participate in the Program
9. Creation of new affordable owner-occupied housing units
10. Creation of new affordable rental housing units and ensuring that there is an adequate supply of public housing in low-poverty census tracts both within the City of Cincinnati and throughout Hamilton County
11. Enhancement of web-based information available on low-income housing opportunities

Neighborhood Strategy

The Neighborhood Strategy, approved by City Council in 2007, includes a housing policy that places emphasis on increasing opportunities for homeownership and highlights the importance of creating mixed income neighborhoods, reducing homelessness, and streamlining the development process. The housing policy includes five priority areas, including the following:

1. Sustainable homeownership, including pre and post homebuyer education, housing counseling, loss mitigation, advocacy against predatory lending, periodic policy review, aging in place programming, access to quality loan products;
2. Focused initiatives addressing condemned/abandoned structures;
3. Support focused housing production creating mixed income neighborhoods;

4. Collaboration with community stakeholders to reduce homelessness; and
5. Streamlining the development process

Rental Rehabilitation Community Council Consideration

A motion adopted by City Council June 27, 2007 states the following: "that vacant property be ineligible to receive rental rehab assistance from the City without consideration from the neighborhood community council being affected and authorization of council".

Analysis of Impediments to Fair Housing Choice

The *Impediments to Fair Housing Choice (2009)*, completed by Housing Opportunities Made Equal identifies seven impediments to fair housing choice for Cincinnati and Hamilton County. The seven impediments, including recommendations to lessen their effects, are as follows:

- *NIMBYism ("Not In My Backyard" reaction) based on Stereotypes*
 1. City and County need to work with CMHA to provide accurate information about the Housing Choice Voucher programs.
 2. City and County should support, encourage, and participate with neighborhood groups who value inclusion and welcome new neighbors.
 3. The Cincinnati Planning Department and Hamilton County Regional Planning Commission could take the lead in creating a positive image of diverse, mixed income communities.
 4. Elected officials and candidates should be asked to sign a pledge to refrain from inflaming racism and prejudice and to show respect for all citizens and their neighborhoods in campaign advertising and rhetoric.
- *Improve the Choice in the Housing Choice Voucher Program*
 5. CMHA, the City, and the County should collaborate on active programs to recruit landlords in low poverty areas and provide information and support to families with Section 8 vouchers interested in making integrative moves.
 6. The City and the County should ask CMHA to refrain from actions that limit housing choice such as using tenant-based vouchers to create project-based units or ways to restrict access to certain neighborhoods.
 7. The City and County should involve Section 8 tenants in community meetings, including upcoming meetings to develop a Cincinnati Comprehensive Plan and community meetings to discuss community development funding.
 8. The City and County should work with CMHA to establish a Community Advisory Committee that includes Section 8 tenants and advocates, landlords, and representatives of communities concerned about the impact of families with vouchers moving to their neighborhoods.
- *Predatory Lending and Lending Discrimination*

9. Assertive law enforcement action is needed on fraudulent foreclosure prevention scams, the next generation of predatory lending that is targeting minority communities.
 10. The City and County should ask the banks in Hamilton County to review their HMDA data and where racial disparities exist to conduct self-testing and establish Mortgage Review Committees to ensure that loan originators and underwriters are not letting stereotypes and prejudice affect their decisions.
 11. The City and County should work with major lenders to place more branches in minority and low- and moderate-income neighborhoods.
- *Discrimination against people with Mental Disabilities*
 12. Training needs to be provided to government officials and local zoning boards in Hamilton County on the Fair Housing Act rights of people with disabilities and the liability of jurisdictions who violate the law.
 13. The City Planning Department and Hamilton County Regional Planning Commission should provide siting assistance programs that enable the siting of special needs housing by providing community education, dispute resolution services and tools such as Good Neighbor Agreements.
 - *A Lack of Accessible Housing*
 14. When the City and County issue occupancy certificates for new multifamily buildings, the inspectors should ensure that the minimal accessibility requirements of the Fair Housing Act are met.
 15. The City and the County should expand their programs providing accessibility modifications for existing housing to serve renters as well as homeowners.
 16. Information on accessible rental units needs to be made more readable available.
 - *Discrimination Against Families with Children*
 17. A significant marketing campaign could open the housing market to families by raising public awareness that housing discrimination against families with children is illegal.
 - *Sexual Harassment*
 18. Educate female tenants that sexual harassment by landlords is illegal and should be reported to HOME.

2005-2009 Consolidated Plan

The *2005-2009 Consolidated Plan* established a strategic approach to City-wide neighborhood revitalization. It established Strategic Investment Areas (SIA). These SIAs consist of neighborhoods that may become LMI (low- to moderate-income)-eligible and those that may become non-eligible. A statistical neighborhood area (SNAs) is LMI eligible when more than 51% of the population has an annual income of 80% or less than the area median income (AMI).

The SNAs that may become LMI-eligible are those with where more than 45% but less than 51% of the population has an annual income of 80% or less than the AMI. These include Clifton, College Hill, East Walnut Hills, Hartwell, Kennedy Heights, Mt. Washington, and Saylor Park.

The SNAs that may become non-eligible are those that are currently eligible but where no more than 60% of the population has an annual income of 80% or less than the AMI. These include Evanston/East Walnut Hills, Mt. Airy, Riverside/Saylor Park, West Price Hill, and Westwood.

As the *2005-2009 Consolidated Plan* finds:

Each of these neighborhoods is at a critical point. By strategically directing funding and support to these 12 neighborhood, or Strategic Investment Areas, there is an opportunity to influence major improvements to housing, business development and quality of life with relatively less cost and effort than if conditions were to worsen. The additional support can be directed to these neighborhoods by spending CDBG dollars for housing and community development improvements in eligible census tracts and through other targeted means such as the establishment of NRSA[Neighborhood Revitalization Strategy Area]s. Additionally, the City can support the Strategic Investment Areas by directing non-CDBG dollars to the areas through execution of capital projects such as streetscape improvements; implementation of key recommendations from approved plans; transportation improvements; technical assistance for CDCs and other community capacity building activities; and other projects or programs that work to improve housing opportunities and conditions, the business environment and quality of life in these neighborhoods.

Given the limited funds for housing and community development, this strategic investment strategy can help ensure the investment of CDBG and HOME dollars has the greatest impact for the City.

BASIS FOR INVESTMENT ALLOCATION AND PRIORITY ASSIGNMENT

The assignment of priority need levels is based on City-wide development objectives established through an evaluation of City policies and the public participation in the planning process. The basis for assigning priority levels for housing (page 49), homeless (page 75), and community development (page 89) are detailed throughout this plan.

OBSTACLES TO MEETING UNDERSERVED NEEDS

The need for decent housing for low- and moderate income individuals and families is tremendous. The greatest obstacle to serving underserved needs is funding. While the City has programs to address the full range of underserved needs, the amount of funding available for those programs is insufficient to produce outcomes that ensure the basic statutory goals for all Cincinnati residents, especially those with the most need.

LEAD-BASED PAINT (91.215 (g))

HOUSING UNITS CONTAINING LEAD-BASED PAINT HAZARDS

Ninety-three percent of Cincinnati's occupied housing units were built prior to 1980, with over 52 percent of it housing stock predating 1950. Homes built before 1978 may have lead-based paint which can deteriorate and create a hazardous condition. According to the table below, homes within the City that were built before 1978 includes almost 94 percent of the owner-occupied units and 92 percent of the renter-occupied units. In 2000, there were 90,336 occupied rental units (60.1%) in Cincinnati and 57,655 dwelling units (39%) that were owner occupied. Of the 147,922 total dwelling units, 105,569 (60.8%) were in structures containing two or more units. In the table below is the percentage of the City's housing stock by age by dwelling unit and occupancy.

Tenure by Year Structure Built – 2000 Census

Year Built	Renter Occupied	%	Owner Occupied	%	Total	%
Pre 1950	37,972	42%	39,090	68%	77,062	52%
1950-1959	14,850	16%	9,165	16%	24,015	16%
1960-1969	17,288	19%	4,297	7%	21,585	15%
1970-1979	13,140	15%	1,756	3%	14,896	10%
1980-2000	7,086	8%	3,347	6%	10,433	7%
Total	90,336	100%	57,655	100%	147,992	100%

Source: 2000 Census

From studies conducted by the Ohio Department of Health and from lead risk assessments conducted on Cincinnati structures, buildings built between 1950 and 1978 have only minor amounts of lead-based paint identified. However, lead dust wipes test have identified levels exceeding HUD guidelines in units built before 1978 even with minor lead-based paint identified. Only about 7 percent of Cincinnati's housing stock can be considered lead-free based on the age of the housing stock.

Based solely on the age of housing, 37,972 occupied rental units and 39,090 owner-occupied dwelling units have a high potential for lead-based paint hazards if deteriorated paint is present. At a more minor risk level 45,278 occupied rental units and 15,218 owner occupied dwelling units may have lead-based paint hazards if deteriorated paint is present based on the age of housing (built between 1951 and 1979). When factoring in households below 80% of median income with the assumption that the property is unlikely to be free of deteriorated paint due to some level of deferred maintenance, it is estimated that 20,000 owner-occupied dwellings have lead hazards.

Household Income as a Percent of Family Income by Occupancy

Household Income as a % of Family Income	Renter Households	%	Owner Households	%	Total Occupied Dwelling Units	%
0-30%	30,294	33.60%	4,899	8.50%	35,193	23.80%
31-50%	16,931	18.80%	5,245	9.10%	22,176	15.00%
51-80%	19,897	22.00%	10,621	18.40%	30,518	20.60%
>80%	23,155	25.60%	36,872	64.00%	60,027	40.60%
Total	90,277	100.00%	57,637	100.00%	147,914	100.00%

Note: Income adjusted for Family Size; Source: HUD Estimate for CHAS

Lead and Children

The Centers for Disease Control and Prevention (CDC) has stated that lead poisoning is the number one environmental health threat for children, and is entirely preventable. Lead is dangerous to persons of all ages and can damage kidneys, red blood cells, and the nervous system. For children under the age of six years, lead poisoning has been defined at blood lead levels of 10 $\mu\text{g}/\text{dL}$, although current research has indicated that serious health threats may also exist at lower lead levels and at continual low-level exposure. Lead can accumulate in the soft tissues in the body (brain, kidneys), bone and blood. Even the smallest amounts of lead can interfere with a child’s brain development and can result in a permanent reduction in intelligence and may cause behavioral and learning problems. Testing children and educating parents are key elements in the success of protecting children from the dangers of lead. There is an urgency to conduct these activities to align with the National Goal of Eliminating Lead Poisoning by 2010. Ohio has the third highest incidence of lead poisoning in the nation. The 2003 CLBS City-level summary data for Ohio ranks Cincinnati second in confirmed elevated blood lead levels in children.

There is an imperative need to screen the children that are at-risk for lead poisoning. According to the Ohio Department of Health, 98% of the zip codes within Hamilton County are considered at-risk for childhood lead poisoning. According to the 2000 census, Cincinnati has a population of 331,285, out of which 28,424 are children under the age of 6 years. In 2006, there were 68,129 children under the age of six years residing in Cincinnati and at-risk for lead poisoning; only 11,872 of those children were tested for lead. Cincinnati is documented to have a high incidence of lead poisoning in young children that is well above National and State averages, yet less than 17.5% of City of Cincinnati children are currently being screened for lead poisoning. In Hamilton County, the testing rates for eligible children were only at 19.9% for 2008. The Ohio Department of Health (ODH), in collaboration with the Center for Biostatistics at Ohio State University, developed a Lead Risk model to determine the high-risk zip codes in Ohio. Their method calculated thirty-four (34) such zip codes in Hamilton County. Using Medicaid statistics provided by the Ohio Department of Job and Family Services, it was determined that of those thirty-four (34) zip codes, twenty-two (22) Cincinnati zip codes have testing rates below 50% of those eligible.

**Cincinnati Children Six Years and Younger with
Elevated Blood Lead Level >14 µg/dL**

Year	# Children Screened	15-19 µg/dL	20-44 µg/dL	45+ µg/dL	Total >14 µg/dL	% of Age >6 Tested
1994	5,568	239	217	15	471	8.50%
1995	8,772	179	151	6	336	3.80%
1996	9,650	178	150	8	336	3.50%
1997	7,176	80	61	9	150	2.10%
1998	6,682	62	36	7	105	1.60%
1999	6,419	66	41	6	113	1.80%
2000	3,526	39	32	2	73	2.10%
2001	3,337	36	35	2	73	2.20%
2002	5,314	101	75	9	185	3.50%
2003	6,781	123	100	9	232	3.40%
2004						
2005	7,805					
2006	11,872					
2007	13,301					
2008	13,589					
Total	63,225	1,103	898	73	2,074	3.30%
Annual Avg.	6,323	110	90	7	207	3.30%

Note: Age of children tested is <6 years of age; Source: Cincinnati Health Department

Statistics	2002	2003	2004	2005	2006	2007	2008
Elevated EBLL children investigated	148	133	123	149	145	158	113
Risk Assessments	185	180	127	121	152	147	108
Male children investigated	86	74	63	88	80	86	66

Female children investigated	62	59	60	85	89	72	58
White children investigated	27	19	29	31	28	42	20
Black children investigated	111	98	84	125	127	108	96
Mixed Race children investigated	8	13	7	9	4	3	5
Asian children investigated	1	0	0	3	0	0	0
Hispanic children investigated	0	0	3	2	7	5	3
Native American children investigated	1	0	0	2	0	0	0
Children with single parent	118	101	97	147	130	142	111
Children with married parents	30	32	26	26	16	16	13
Children in low income	121	80	103	163	146	152	123
Children in low to moderate income	25	51	19	6	2	5	1
Children in high income	2	0	1	1	0	1	0
Primary Housing Units investigated	126	105	107	135	117	110	91
Supplemental Housing Units investigated	27	21	12	15	14	11	9
Relocation Housing Units investigated	32	54	35	20	35	23	20
Referrals of units for investigation	208	195	185	192	145	158	124
Re-inspections for compliance	246	366	288	264	1,085		
Orders issued to abate lead hazards	1,991	1,085	1,100	506	96		79
Properties with final clearance	52	159	85	95	77		
Properties abated and files closed	104	159	102	104	84	49	54
Properties access refused	11	21	32	15	7	1	4
Owners/residence unable to contact	0	0	14	11	18	10	10

Source: Cincinnati Health Department

The risk of lead poisoning has been correlated to both housing characteristics and socio-economic characteristics. According to an Ohio Department of Health and Center for Biostatistics of Ohio University study in 2003, the greatest predictive factors for lead poisoning are income, a high percentage of female-headed households with children under six years of age, a high percentage of population with less than a high school diploma, a high percentage of the population that is black and non-Hispanic, a high percentage of the families on public assistance, and a high percentage of houses built before 1950, and housing density. The highest concentration of children who are tested having blood lead levels above 10 µg/dL was in the neighborhoods of Evanston, Avondale, and Price Hill with over 17% (on average over the last two years). The pattern and concentration of at-risk lead poisoned children are centered in the Empowerment Zone neighborhoods, Lower Price Hill, East Price Hill, Northside and Madisonville. These are communities with older housing stock where lower income families reside.

LEAD POISONING PREVENTION EFFORTS

The Cincinnati Health Department (CHD) Childhood Lead Poisoning Prevention Program (CLPPP) was started to provide community education on health problems associated with lead poisoning, to conduct mass screenings of children to identify those with elevated blood lead levels, to arrange appropriate medical treatment for identified children, and to monitor those children through their preschool years. In 1976, the CHD issued a regulation prohibiting the sale and use of lead-based paint for surfaces accessible to children, thus allowing it to enforce modifications to housing units to reduce the lead-based paint hazards in the community.

The Cincinnati Health Department's CLPPP has been in operation since 1972 and has issued Cincinnati Board of Health orders to property owners in violation. In December 2005, the Cincinnati Board of Health revised the old laws and incorporated laws based on Ohio's House Bill 248 and Ohio Department of Health law 3701. These enabled CLPPP to immediately and aggressively pursue legal actions with non-complaint property owners.

There are on a yearly basis approximately 300 lead abatement orders issued from Cincinnati Health Department dating back to 1994. Since 2003, a lead inspection is triggered with a child under the age of six years whose lead level is 10 µg/dL or higher. There is nurse case management to educate the parents of the child with elevated blood lead levels of 10 µg/dL and above. The child is case managed until he/she is no longer considered lead poisoned. There are also public health nurses within CLPPP who are involved with early intervention between the blood lead levels of 5 – 9 µg/dL. Early intervention involves home visits, distribution of educational information and counseling of parents. The City of Cincinnati was the first in the country to initiate intensive case management and primary prevention activities towards reducing lead poisoning in children. Primary prevention activities continue to be the focus of interventions regarding the public health problem of lead poisoning in Cincinnati. Early interventions at levels between 5 – 9 µg/dL have aided in fewer lead poisoning cases.

An analysis of the 2008 list of lead hazard reduction orders indicates that approximately 79% percent of the children identified as having elevated blood lead levels (EBLL) live in single or two-family dwelling units and approximately 43% of these are in owner occupied structures. An elevated blood level case in a low-income, owner occupied structure is the most difficult situation to address.

CLPPP outreach and education functions are performed by the Southwest Regional Resource Center (SWRRC), which has been operating solely on a grant provided by the Ohio

Department of Health (ODH) since 1984 for community education and outreach. The original purpose of the RRC was to provide assistance with the coordination of medical and environmental follow-up services, education and training, outreach support; and, technical assistance. The SWRRC is assigned a 22-county region of the state to increase childhood lead poisoning awareness and screening. SWRRC is responsible for ensuring that parents with children at high risk for lead poisoning have access to and receive accurate, appropriate and culturally sensitive education about the causes, effects and prevention of childhood lead poisoning, children at high risk for lead poisoning are screened, and health care providers are aware of risks, screening recommendations, treatment and management of lead poisoning for children in the communities they serve. Cincinnati's CLPPP has been consistently awarded this grant for meeting ODH goals and objectives set forth each year. Primary prevention initiatives are underway to educate and mitigate hazards through educational seminars with various organizations to address vacant and occupied units before children get lead poisoned and educating new moms in the maternity wards of hospitals before they leave the hospital with their newborn.

With the SWRRC link into the health care community, the Cincinnati Health Department has been able to provide an increased awareness of the statewide screening plan, community risk factors, screening, and follow-up. This experience with lead poisoning prevention has been extremely beneficial to the twenty-two southwest counties that the Cincinnati Health Department administers through the State grant granted by the Ohio Department of Health.

The Cincinnati Health Department CLPPP has expanded its working partnerships to include WIC (Women, Infant and Children) clients, local health department (Maternal and Child Health) nurses, local hospitals, Community Councils, REIA (Real Estate Investment Association) and Santa Maria and Su Casa Centers. CHD has already established a working relationship with HUD and U.S.EPA Region V. In 2006, CHD provided HUD's legal office in Washington, DC with the database of recalcitrant property owners. In response, HUD has aided CHD with prosecuting these property owners. In March 2007, officials from HUD and U.S.EPA conducted joint inspections in the Cincinnati area addressing the lead disclosure law. CHD plays a vital role in the City's administrative organization in collaboration with our Departments of Buildings and Inspections, Law, Community Development and Cincinnati Metropolitan Housing Authority (CMHA).

On September 12, 2006, Cincinnati City Council passed a Resolution identifying the actions the City was going to undertake to eliminate childhood lead poisoning by 2010. Those actions include: prohibiting uncontrolled water blasting, requiring residential landlords to maintain paint in pre-1978 housing and follow essential maintenance practices, increase blood lead screenings, and prohibiting the issuance of building permits for dwellings with unclosed lead orders issued by the Cincinnati Health Department. Many of these resolutions came out of the Greater Cincinnati Lead Advisory 2010 Plan presented to the administration and City Council.

The University of Cincinnati was an early leader in occupational and environmental health research. The first major lead research project at UC was conducted in the 1920's in response to a public health crisis involving tetraethyl lead, an additive of gasoline. Researchers at the newly founded Kettering Laboratory (later changed to the Department of Environmental Health) conducted the research. Research on lead has continued uninterrupted to the present and has influenced national and state policy and regulations. In recent years, senior staff in the Department of Environmental Health has conducted the following major research projects:

1. The Cincinnati Soil Lead Abatement Demonstration Project which investigated the health impact of removing lead contaminated soil and dust on children less than seven years of age living in older Cincinnati neighborhoods. The Cincinnati Health Department was a partner in this project.
2. The Succimer Project was a field investigation of the efficacy of a drug used to remove lead from the body and whether or not it reduced the amount of neurological damage to young children.
3. The Department developed the model curriculum for the EPA-approved courses for lead abatement supervisors and contractors, both of which are taught nationwide.
4. Researchers have conducted environmental studies at ten U.S.EPA Superfund sites where lead, arsenic and zinc were the major contaminants. The findings of the studies helped EPA set cleanup levels.
5. Thirty year ago, the Department began a longitudinal study (The Cincinnati Lead Study) of lead exposure and child development in Cincinnati's urban environment. The study began with 200 newborn infants. In the past two years the 91 adults (aged 20 to 26) remaining from the original group agreed to undergo functional MRI and diffusion tensor imaging (DTI). The results showed significant abnormalities and smaller brain size related to the degree of lead exposure.
6. The Department played a significant role in the ten-year long evaluation of the HUD Lead-based paint Hazard Control Program.
7. Researchers in the Department have been conducting a study of the worldwide manufacture of lead-based paints concluding that many countries allow its manufacture and distribution for residential purposes.
8. Researchers have also been working on health and exposure studies in residential neighborhoods around lead smelters in Peru and Egypt.

Cincinnati has funded other efforts to reduce the hazards associated with lead poisoning of children. Since 1993, program funds have been used to assist families to vacate buildings due to badly deteriorated lead-based paint. The City was awarded \$6 million in the 1993 HUD Lead-Based Paint Abatement program. With these funds, the City designated the Cincinnati Abatement Program (CAP) to test the effectiveness of a variety of hazard reduction methodologies on 280 housing units. The CAP was administered by the CHD with major program activities managed by the Department of Neighborhood Services and UC.

In 1999, the University of Cincinnati in conjunction with the City's Office of Environmental Services conducted studies on reducing the street lead dust levels. Studies found that vacuuming of sidewalks and streets in high-risk areas reduced lead levels but only temporarily. It recommended that lead hazard reduction control rules during building rehabilitation be more actively enforced; and that new regulations be adopted that would allow more direct action to be taken to prevent lead poisoning rather than waiting until a child has been diagnosed with lead poisoning. A follow up grant of \$400,000 was awarded to conduct façade improvements on deteriorated buildings in the Over-the-Rhine neighborhood. The program completed the renovation of seven façades and was used to train and employee area residents in hazardous material removal.

In 2002, the City was awarded a \$2.1 million HUD Lead Hazard Reduction grant in which 222 dwelling units were made lead safe. The original project goal was to make 160 dwelling

units lead safe, achieving 138% of this goal. The grant was awarded to the Department of Community Development in partnership with the University of Cincinnati and the Cincinnati Health Department. Again, UC's efforts were concentrated in the neighborhood of Over-the-Rhine with an emphasis on making the low-income dwelling units lead safe. Rental units under going rehabilitation through the City's rental rehabilitation program were assisted with lead hazard reduction grants on a citywide basis. The Cincinnati Health Department provided a Health Nurse to present at health fairs, neighborhood and church events, and community center activities which included information residents could use to protect themselves from everyday environmental contaminants and promote the healthy growth and development of their children.

In 2008, CHD CLPPP was awarded a three-year \$3 million HUD Lead Hazard Control Grant. A total of 210 units, income-eligible owner-occupied and rental located throughout the City, will have lead hazard control work performed. DCD was awarded a three-year \$3 million HUD Lead Hazard Reduction Demonstration Grant in 2009. The focus of this HUD grant proposal is on the seventeen neighborhoods where the City's elevated blood lead level caseloads are located. A total of 240 income-eligible owner-occupied housing units, where a child under the age of six resides or frequents, located within the target neighborhoods will have hazard control work performed. 17 neighborhoods have been documented as having a high prevalence of lead poisoning are: Westend, Over-the-Rhine, Mt. Auburn, Fairview-Clifton Heights, Corryville, Walnut Hills, Evanston, Madisonville, Avondale, Northside, South Cumminsville, North Fairmount, South Fairmount, East Price Hill, Lower Price Hill, West Price Hill, and Carthage. Nine neighborhoods are also located within the City of Cincinnati's Empowerment Zone.

The Department of Community Development has integrated HUD's lead-based paint regulations into its housing programs requiring risk assessments and lead hazard reduction work on projects where rehabilitation efforts with Federal assistance on structures built before 1978. Since 2000 through 2008, over 2,800 dwelling units have been assessed and over 1,600 dwelling units have been cleared as being lead safe (several of these units were identified as having no lead-based paint present from the lead risk assessment).

HOUSING

HOUSING NEEDS (91.205)

ESTIMATED HOUSING NEEDS

HUD Comprehensive Housing Affordability Strategy (CHAS) data provides estimates of the housing needs among very-low- (incomes less than 30 percent of area median income (AMI), low- (incomes 30 to 50 percent of AMI), and moderate- (50 to 80 percent of AMI) income households. The table below (and subsequent tables in the Priority Housing Needs section) documents housing and cost burden for renters and owners of various household types including the following: small elderly households (1 to 2 persons), small related households (2 to 4 persons), large related households (5 or more persons), and all other households. Housing units with housing problems are those where there is a cost burden and/or overcrowding (more than 1.01 persons per room) and/or incomplete kitchen or plumbing facilities. HUD defines cost burden as the fraction of a households total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant

plus utilities. For homeowners, housing costs include mortgage payment, taxes, insurance, and utilities.

The table below shows the number and percentage of very-low-, low-, and moderate-income households that have one or more housing problems.

Housing Problems by Household Income, 2000

Household Income	Renters			Owners		
	Total Number	# with Housing Problem	% with Housing Problem	Total Number	# with Housing Problem	% with Housing Problem
Less than 30% AMI	30,294	21,429	70.7%	4,899	3,679	75.1%
30% to 50% AMI	16,931	8,561	50.6%	5,245	2860	54.5%
50% to 80% AMI	19,897	3,327	16.7%	10,621	3,776	35.6%
Total	67,122	33,317	49.6%	20,765	10,315	49.7%

Cincinnati has 90,336 total rental units. Over 33,000 rental units are considered to have housing problems.

Of the 30,294 units with household income less than 30% AMI, 70% have housing problems. Of the 16,931 households with income between 30% and 50% of AMI, 50.6% have housing problems and 16.7% of the 19,897 households with income between 50% and 80% of AMI have housing problems. In total, Cincinnati has a need of 43,632 affordable units that need, are in need of repair, or pose a cost burden. While lower income households are more likely to experience housing problems, nearly 50 percent of all renters earning less than 80 percent of AMI have a housing problem.

DISPROPORTIONATE NEED

According to HUD a “disproportionately greater need” exists when the percentage of persons in a category of need who are members of a particular racial/ethnic group is at least 10 percentage points. The first calculation compares the percentage of total households in each income category to the total percentage of White, African American, and Hispanic Households. The percentages of households were found by dividing each income category by the total number of households in each race/ethnicity. In this instance, no group was found to have a disproportionately greater need, because no group comprised more than 10% of the total percentage. The closest category was African Americans who make under \$10,000/year, which was 9.6% higher than the total average.

The second method of calculation compares each group’s representation among total households to each group’s representation per income category. The percent of income by race was determined by dividing the number of households in each race category by the total number of households in the income category. The percentages were then compared to the rate of racial representation in the total number of households. In this case African Americans were found to have a disproportionately greater need in the income category under \$10,000. African Americans in that income bracket comprised over 20% of their proportional representation in the population as a whole. African Americans are at risk of having disproportionately greater need in two other categories: \$10,000-\$14,999; and \$15,000-\$19,999.

Rates of Racial Representation v. Rates of Income Distribution by Race

	Cincinnati	White	% White	Black	% Black	Hispanic	% Hispanic
Households: Total	147,979	83,830	56.65%	58,579	39.59%	1,479	1.00%
Less than \$10,000	26,690	9,354	35.05%	16,189	60.66%	229	0.86%
\$10,000 to \$14,999	12,786	6,173	48.28%	6,106	47.76%	155	1.21%
\$15,000 to \$19,999	12,013	5,868	48.85%	5,703	47.47%	172	1.43%
\$20,000 to \$24,999	12,396	6,589	53.15%	5,361	43.25%	116	0.94%
\$25,000 to \$29,999	11,102	6,000	54.04%	4,627	41.68%	116	1.04%
\$30,000 to \$34,999	10,095	6,062	60.05%	3,691	36.56%	79	0.78%
\$35,000 to \$39,999	8,561	5,375	62.78%	2,816	32.89%	78	0.91%
\$40,000 to \$44,999	7,397	4,672	63.16%	2,491	33.68%	93	1.26%
\$45,000 to \$49,999	6,214	3,984	64.11%	1,960	31.54%	68	1.09%
\$50,000 to \$59,999	9,885	6,768	68.47%	2,848	28.81%	87	0.88%
\$60,000 to \$74,999	10,566	7,479	70.78%	2,680	25.36%	89	0.84%
\$75,000 to \$99,999	9,282	6,745	72.67%	2,236	24.09%	74	0.80%
\$100,000 to \$124,999	4,359	3,436	78.83%	771	17.69%	32	0.73%
\$125,000 to \$149,999	1,942	1,454	74.87%	411	21.16%	28	1.44%
\$150,000 to \$199,999	2,025	1,743	86.07%	195	9.63%	21	1.04%
\$200,000 or more	2,666	2,128	79.82%	494	18.53%	42	1.58%

While Cincinnati has a significant number of Appalachians, it is impossible to determine whether they have a disproportionate need. The above analysis performed to determine whether African American or Hispanic households had a disproportionate need was based on race data provided by the U.S. Census Bureau. The U.S. Census Bureau race classifications includes information only for the following groups: White alone; Black or African American alone; American Indian and Alaska Native alone; Asian alone; Native Hawaiian and Other Pacific Islander alone; Some other race alone; or Two or more races.

PRIORITY HOUSING NEEDS (91.215 (b))

HOUSING NEEDS TABLE

The following tables provide estimates of the housing needs among very-low- (incomes less than 30 percent of area median income (AMI), low- (incomes 30 to 50 percent of AMI), and moderate- (50 to 80 percent of AMI) income households. The tables document housing and cost burden for renters and owners of various household types including the following: small elderly households (1 to 2 persons), small related households (2 to 4 persons), large related households (5 or more persons), and all other households. Housing units with housing problems are those where there is a cost burden and/or overcrowding (more than 1.01 persons per room) and/or incomplete kitchen or plumbing facilities.

Housing Problems for Very-Low Income Households, 2000

			Current % of Households	Current Number of Households	
Estimated Housing Needs for Households Earning Less than 30% of the Area Median Income	Renters	Elderly 1 & 2 member households	NUMBER OF HOUSEHOLDS	100%	6,364
			Any housing problems	64.6	4,114
			Cost Burden > 30%	64.3	4,089
			Cost Burden > 50%	37.1	2,359
		Small Related (2 to 4 members)	NUMBER OF HOUSEHOLDS	100%	9,230
			Any housing problems	72.4	6,685
			Cost Burden > 30%	70.4	6,500
			Cost Burden > 50%	48.6	4,485
		Large Related (5 or more members)	NUMBER OF HOUSEHOLDS	100%	1,905
			Any housing problems	84	1,600
			Cost Burden > 30%	70.9	1,350
			Cost Burden > 50%	51.4	980
	All Other Households	NUMBER OF HOUSEHOLDS	100%	12,795	
		Any housing problems	70.6	9,030	
		Cost Burden > 30%	69.2	8,850	
		Cost Burden > 50%	50.8	6,495	
	Owners	Elderly 1 & 2 member households	NUMBER OF HOUSEHOLDS	100%	2,575
			Any housing problems	74.2	1,910
			Cost Burden > 30%	73.8	1,900
			Cost Burden > 50%	48.9	1,260
		Small Related (2 to 4 members)	NUMBER OF HOUSEHOLDS	100%	1,073
			Any housing problems	78.1	838
			Cost Burden > 30%	76.3	819
			Cost Burden > 50%	62.9	675
Large Related (5 or more members)		NUMBER OF HOUSEHOLDS	100%	235	
		Any housing problems	87.2	205	
		Cost Burden > 30%	83	195	
		Cost Burden > 50%	59.6	140	
All Other Households	NUMBER OF HOUSEHOLDS	100%	1,016		
	Any housing problems	71.5	726		
	Cost Burden > 30%	70.7	718		
	Cost Burden > 50%	60.9	619		

Housing Problems for Low Income Households, 2000

			Current % of Households	Current Number of Households	
Estimated Housing Needs for Households Earning Less than 30% to 50% of the Area Median Income	Renters	Elderly 1 & 2 member households	NUMBER OF HOUSEHOLDS	100%	3,068
			Any housing problems	46.5	1,428
			Cost Burden > 30%	45.8	1,404
			Cost Burden > 50%	12.5	385
		Small Related (2 to 4 members)	NUMBER OF HOUSEHOLDS	100%	5,459
			Any housing problems	43.5	2,374
			Cost Burden > 30%	39.8	2,174
			Cost Burden > 50%	5.5	300
		Large Related (5 or more members)	NUMBER OF HOUSEHOLDS	100%	1,194
			Any housing problems	71.9	859
			Cost Burden > 30%	33.4	399
			Cost Burden > 50%	4.5	54
	All Other Households	NUMBER OF HOUSEHOLDS	100%	7,210	
		Any housing problems	54.1	3,900	
		Cost Burden > 30%	52.5	3,785	
		Cost Burden > 50%	8.9	645	
	Owners	Elderly 1 & 2 member households	NUMBER OF HOUSEHOLDS	100%	2,635
			Any housing problems	36.8	970
			Cost Burden > 30%	36.8	970
			Cost Burden > 50%	18.8	495
		Small Related (2 to 4 members)	NUMBER OF HOUSEHOLDS	100%	1,239
			Any housing problems	70.9	879
			Cost Burden > 30%	70.9	879
			Cost Burden > 50%	31	384
Large Related (5 or more members)		NUMBER OF HOUSEHOLDS	100%	398	
		Any housing problems	73.6	293	
		Cost Burden > 30%	67.6	269	
		Cost Burden > 50%	27.4	109	
All Other Households	NUMBER OF HOUSEHOLDS	100%	973		
	Any housing problems	73.8	718		
	Cost Burden > 30%	73.4	714		
	Cost Burden > 50%	45.7	445		

Housing Problems for Moderate Low Income Households, 2000

			Current % of Households	Current Number of Households	
Estimated Housing Needs for Households Earning Less than 50% to 80% of the Area Median Income	Renters	Elderly 1 & 2 member households	NUMBER OF HOUSEHOLDS	100%	2,118
			Any housing problems	24.9	528
			Cost Burden > 30%	24	508
			Cost Burden > 50%	9.4	199
		Small Related (2 to 4 members)	NUMBER OF HOUSEHOLDS	100%	6,265
			Any housing problems	15.6	980
			Cost Burden > 30%	9.5	595
			Cost Burden > 50%	0.5	30
		Large Related (5 or more members)	NUMBER OF HOUSEHOLDS	100%	1,020
			Any housing problems	48	490
			Cost Burden > 30%	9.8	100
			Cost Burden > 50%	0	0
	All Other Households	NUMBER OF HOUSEHOLDS	100%	10,494	
		Any housing problems	12.7	1,329	
		Cost Burden > 30%	11	1,159	
		Cost Burden > 50%	0.9	90	
	Owners	Elderly 1 & 2 member households	NUMBER OF HOUSEHOLDS	100%	4,052
			Any housing problems	19.9	807
			Cost Burden > 30%	19.7	799
			Cost Burden > 50%	6.6	269
		Small Related (2 to 4 members)	NUMBER OF HOUSEHOLDS	100%	3,458
			Any housing problems	40	1,383
			Cost Burden > 30%	39.8	1,375
			Cost Burden > 50%	8.1	280
Large Related (5 or more members)		NUMBER OF HOUSEHOLDS	100%	1,093	
		Any housing problems	41.4	453	
		Cost Burden > 30%	26.8	293	
		Cost Burden > 50%	2.7	30	
All Other Households	NUMBER OF HOUSEHOLDS	100%	2,018		
	Any housing problems	56.1	1,133		
	Cost Burden > 30%	55.7	1,125		
	Cost Burden > 50%	18.1	365		

DETERMINING PRIORITY HOUSING NEEDS

In Cincinnati there are currently a total of 90,336 renter-occupied housing units and 57,655 owner-occupied housing units. Priority need levels were assigned for households by calculating the percent of total units that the unmet need comprised. A high priority level was assigned for household groups with unmet needs greater than 4 percent of the total number of renter or owner-occupied units. High priority was also assigned to all homeowners with housing problems living below 80 percent of AMI (area median income). A medium priority level was assigned to households with an unmet need between 1 and 4 percent. A low priority level was assigned to households with an unmet need of less than 1 percent.

Priority Housing Needs

		Priority Need Level (High, Medium, Low)		Unmet Need	5-Year Goal
Renter	Small Related (2 to 4 members)	0-30% AMI	H	6685	100
		31-50% AMI	M	2,374	36
		51-80% AMI	M	980	15
	Large Related (5 or more members)	0-30% AMI	M	1,600	24
		31-50% AMI	L	859	13
		51-80% AMI	L	490	7
	Elderly (1 and 2 member households)	0-30% AMI	H	4,114	62
		31-50% AMI	M	1,428	21
		51-80% AMI	L	528	8
	All Other	0-30% AMI	H	9,030	136
		31-50% AMI	H	3,900	59
		51-80% AMI	M	1,329	20
Owner	Small Related (2 to 4 members)	0-30% AMI	H	838	806
		31-50% AMI	H	879	846
		51-80% AMI	H	1,383	1,331
	Large Related (5 or more members)	0-30% AMI	H	205	197
		31-50% AMI	H	293	282
		51-80% AMI	H	453	436
	Elderly (1 and 2 member households)	0-30% AMI	H	1,910	1,838
		31-50% AMI	H	970	934
		51-80% AMI	H	807	777
	All Other	0-30% AMI	H	726	699
		31-50% AMI	H	718	691
		51-80% AMI	H	1,133	1,090
Non-Homeless Special Needs		0-80% AMI		NA	

The five-year goals include the number of new or improved housing units as well as households assisted through emergency mortgage assistance and through the downpayment initiative. Five-year goals for each household group were determined by multiplying the percentage of renter and owner households with incomes below 80 percent of AMI comprised by each group by the five-year targets for renter and homeownership activities outlined in the *Recommended Consolidated Plan Budget*. The goals do not reflect households and individuals assisted through the following programs: Tenant Assistance, Code Enforcement Relocation, Tenant Representation, Section 8 Tenant Counseling and Placement, Tenant Based Rental Assistance (TBRA), and Fair Housing Services.

OBSTACLES TO MEETING UNDERSERVED NEEDS

The need for decent housing for low- and moderate-income individuals and families is tremendous. The greatest obstacle to serving underserved needs is funding. While the City has programs to address the full range of underserved needs, the amount of funding available for those programs is insufficient to produce outcomes that ensure the basic statutory goals for all Cincinnati residents, especially those with the most need.

HOUSING MARKET ANALYSIS (91.210)

Housing Stock

The City of Cincinnati's housing stock contains nearly 166,000 housing units. The City's total number of housing units has decreased by 5% since 1980. Unfortunately there has also been a large increase in the number of vacant units. In 1980 vacant units accounted for 8.6% of the total housing stock. That number has risen 20% by 2000 to account for 10.8%.

Cincinnati has a very low but steady homeownership rate of 39%. To compare, the homeownership rates of other mid-sized cities in Ohio are higher; Cleveland and Columbus both have a homeownership rate of 49%.

Cincinnati Housing Tenure in Comparison to the CMSA

Housing Units	Hamilton County, Ohio	Cincinnati, Ohio	Cincinnati-Hamilton, OH-KY-IN CMSA	Cincinnati, OH-KY-IN PMSA; Cincinnati-Hamilton, OH-KY-IN CMSA
Total Units	373,393	165,945	820,756	690,963
Occupied Units	346,790	147,991	768,130	645,048
Owner-Occupied Units	207,533	57,655	515,195	427,074
Renter-Occupied Units	139,257	90,336	252,935	217,974
Vacant Units	26,603	17,954	52,626	45,915
Rental Units	13,711	10,033	23,284	20,382
Units for sale only	3,349	1,566	9,187	7,458

2000 Cincinnati Housing Tenure in Comparison to the State of Ohio and Other Regional Cities

	Ohio					
	Akron	Cincinnati	Cleveland	Columbus	Dayton	Toledo
Total Population	217,074	331,285	478,403	711,470	166,179	313,619
Total Households	90,116	148,095	190,638	301,534	67,409	128,925
Owner Occupied	53,500	57,715	92,535	148,004	35,565	77,062
Renter Occupied	36,616	90,380	98,103	153,530	31,844	51,863
Homeownership Rate	59%	39%	49%	49%	53%	60%

	Regional Cities			
	Indianapolis, Indiana	Louisville, Kentucky	St. Louis, Missouri	Pittsburgh, Pennsylvania
Total Population	781,870	256,231	348,189	334,563
Total Households	320,107	111,414	147,076	143,739
Owner Occupied	187,590	58,546	68,939	74,927
Renter Occupied	132,517	52,868	78,137	68,812
Homeownership Rate	59%	53%	47%	52%

The following table shows the distribution of the City's owner-occupied and renter-occupied housing stock across the City's SNAs. The SNA names highlighted are LMI eligible. Rates of renter-occupied units that exceed the City average are also highlighted. There appears to be a loose correlation between the percent of renter-occupied units and an SNA's LMI eligibility status. Several SNA's with the highest renter-occupied rate (above 70%) – including Corryville, Fairview-Clifton Heights, Fay Apartments, Lower Price Hill, Mt. Auburn, North-Fairmount-English Woods, Over-the-Rhine, South Cumminsville-Millvale, University Heights, Walnut Hills, West End, and Winton Hills – are SNA's that are LMI eligible. However, it also holds true that two of the SNA's with the highest homeownership rates in the City (above 80%), Avondale and Evanston, are also LMI eligible.

Housing Tenure by Statistical Neighborhood Area (SNA), 2000

SNA #	Statistical Neighborhood Area	Housing Units	Owner-occupied Housing Units		Renter-Occupied Housing Units	
		Total	No.	%	No.	%
31	Avondale	8,128	6,884	84.69%	1,244	15.31%
29	Bond Hill	4,166	1,883	45.20%	2,283	54.80%
16	California	353	302	85.55%	51	14.45%
8	Camp Washington	502	145	28.88%	357	71.12%
27	Carthage	1,066	594	55.72%	472	44.28%
3	CBD-Riverfront	1,968	1,512	76.83%	456	23.17%
32	Clifton	4,552	1,509	33.15%	3,043	66.85%
37	College Hill	7,063	4,210	59.61%	2,853	40.39%
10	Corryville	1,825	235	12.88%	1,590	87.12%
15	East End	731	360	49.25%	371	50.75%
43	East Price Hill	7,026	2,765	39.35%	4,261	60.65%
41	East Walnut Hills	1,729	535	30.94%	1,194	69.06%
12	Evanston	3,510	3,059	87.15%	451	12.85%
13	Evanston-East Walnut Hills	729	334	45.82%	395	54.18%
7	Fairview- Clifton Heights	3,549	781	22.01%	2,768	77.99%
39	Fay Apartments	896	47	5.25%	849	94.75%
26	Hartwell	2,777	920	33.13%	1,857	66.87%
21	Hyde Park	7,139	3,776	52.89%	3,363	47.11%
25	Kennedy Heights	2,551	1,577	61.82%	974	38.18%
20	Linwood	410	204	49.76%	206	50.24%
42	Lower Price Hill	430	87	20.23%	343	79.77%
23	Madisonville	4,917	2,831	57.58%	2,086	42.42%
5	Mt. Adams	1,001	330	32.97%	671	67.03%
38	Mt. Airy	3,678	1,385	37.66%	2,293	62.34%
6	Mt. Auburn	2,713	794	29.27%	1,919	70.73%
19	Mt. Lookout	1,374	1,087	79.11%	287	20.89%
18	Mt. Lookout- Columbia Tusculum	1,490	964	64.70%	526	35.30%
17	Mt. Washington	6,760	3,904	57.75%	2,856	42.25%
30	North Avondale- Paddock Hills	2,285	1,157	50.63%	1,128	49.37%
40	North Fairmount- English Woods	1,775	510	28.73%	1,265	71.27%
34	Northside	4,054	2,002	49.38%	2,052	50.62%
22	Oakley	6,365	2,757	43.32%	3,608	56.68%
4	Over-the-Rhine	3,594	140	3.90%	3,454	96.10%
24	Pleasant Ridge	4,460	2,191	49.13%	2,269	50.87%
1	Queensgate	2	1	50.00%	1	50.00%
47	Riverside-Sayler Park	631	254	40.25%	377	59.75%
28	Roselawn	3,423	1,240	36.23%	2,183	63.77%
48	Sayler Park	1,246	835	67.01%	411	32.99%
46	Sedamsville-Riverside	754	377	50.00%	377	50.00%
35	South Cumminsville- Millvale	1,423	359	25.23%	1,064	74.77%
41	South Fairmount	1,274	427	33.52%	847	66.48%
9	University Heights	3,313	418	12.62%	2,895	87.38%
11	Walnut Hills	3,797	714	18.80%	3,083	81.20%
44	West Price Hill	7,666	4,234	55.23%	3,432	44.77%
2	West End	3,958	408	10.31%	3,550	89.69%
45	Westwood	16,681	6,496	38.94%	10,185	61.06%
36	Winton Hills	2,032	134	6.59%	1,898	93.41%
33	Winton Place	939	539	57.40%	400	42.60%

* Concentrations of 61% or greater are highlighted. City-wide, 61% of all housing units are renter-occupied; 39% are owner-occupied. SNA's that are LMI eligible are also highlighted.

The following table shows the distribution of housing units by housing unit type across the City's SNA's. The SNA names highlighted are LMI eligible. Rates of each housing unit type that exceed the City average are also highlighted. Several of the LMI eligible SNA's have more than 25% of all housing units in buildings with more than 10 units. These include the following SNAs: Avondale, CBD-Riverfront, Corryville, Mt. Airy, Riverside-Sayler Park, South Cumminsville-Millvale, South Fairmount, University Heights, Walnut Hills, West End, Westwood, Winton Hills, and Winton Place.

Housing Unit Type by Statistical Neighborhood Area (SNA), 2000

SNA #	Statistical Neighborhood Area	Housing Units		1-unit detached		1-unit attached		2 units		3 or 4 units		5 to 9 units		10 to 19 units		20 or more units		
		Total	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
31	Avondale	6,890	1,397	20.28%	136	1.97%	793	11.51%	1,447	21.00%	756	10.97%	768	11.15%	1,593	23.12%		
29	Bond Hill	4,157	1,795	43.18%	123	2.96%	592	14.24%	673	16.19%	782	18.81%	51	1.23%	141	3.39%		
16	California	350	350	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%		
8	Camp Washington	535	175	32.71%	23	4.30%	91	17.01%	166	31.03%	69	12.90%	11	2.06%	0	0.00%		
27	Carthage	1,066	653	61.26%	40	3.75%	129	12.10%	141	13.23%	34	3.19%	26	2.44%	43	4.03%		
3	CBD-Riverfront	1,477	6	0.41%	10	0.68%	33	2.23%	76	5.15%	75	5.08%	151	10.22%	1,126	76.24%		
32	Clifton	4,614	1,298	28.13%	71	1.54%	358	7.76%	368	7.98%	713	15.45%	699	15.15%	1,107	23.99%		
37	College Hill	7,322	4,711	64.34%	105	1.43%	309	4.22%	506	6.91%	337	4.60%	576	7.87%	778	10.63%		
10	Corryville	1,825	264	14.47%	45	2.47%	237	12.99%	365	20.00%	352	19.29%	144	7.89%	418	22.90%		
15	East End	739	397	53.72%	43	5.82%	158	21.38%	84	11.37%	42	5.68%	6	0.81%	9	1.22%		
43	East Price Hill	7,018	2,937	41.85%	174	2.48%	1,149	16.37%	875	12.47%	473	6.74%	643	9.16%	767	10.93%		
41	East Walnut Hills	2,151	323	15.02%	75	3.49%	153	7.11%	250	11.62%	244	11.34%	290	13.48%	816	37.94%		
12	Evanston	3,066	1,501	48.96%	67	2.19%	503	16.41%	364	11.87%	89	2.90%	140	4.57%	402	13.11%		
13	Evanston-East Walnut Hills	706	305	43.20%	35	4.96%	88	12.46%	140	19.83%	22	3.12%	61	8.64%	55	7.79%		
7	Fairview- Clifton Heights	3,516	888	25.26%	103	2.93%	920	26.17%	781	22.21%	293	8.33%	250	7.11%	281	7.99%		
39	Fay Apartments	835	13	1.56%	179	21.44%	7	0.84%	96	11.50%	442	52.93%	85	10.18%	13	1.56%		
26	Hartwell	2,770	883	31.88%	109	3.94%	268	9.68%	348	12.56%	463	16.71%	233	8.41%	466	16.82%		
21	Hyde Park	7,161	3,355	46.85%	106	1.48%	569	7.95%	629	8.78%	461	6.44%	725	10.12%	1,316	18.38%		
25	Kennedy Heights	2,551	1,613	63.23%	41	1.61%	94	3.68%	301	11.80%	122	4.78%	170	6.66%	210	8.23%		
20	Linwood	414	247	59.66%	12	2.90%	77	18.60%	50	12.08%	15	3.62%	13	3.14%	0	0.00%		
42	Lower Price Hill	430	84	19.53%	26	6.05%	62	14.42%	174	40.47%	59	13.72%	19	4.42%	6	1.40%		
23	Madisonville	4,909	3,103	63.21%	56	1.14%	381	7.76%	377	7.68%	200	4.07%	392	7.99%	400	8.15%		
5	Mt. Adams	991	150	15.14%	96	9.69%	217	21.90%	206	20.79%	131	13.22%	47	4.74%	144	14.53%		
38	Mt. Airy	3,678	1,361	37.00%	228	6.20%	199	5.41%	467	12.70%	277	7.53%	823	22.38%	323	8.78%		
6	Mt. Auburn	2,709	625	23.07%	181	6.68%	441	16.28%	513	18.94%	344	12.70%	281	10.37%	324	11.96%		
19	Mt. Lookout	1,348	1075	79.75%	17	1.26%	84	6.23%	122	9.05%	29	2.15%	8	0.59%	13	0.96%		
18	Mt. Lookout- Columbia Tusculum	1,500	848	56.53%	113	7.53%	136	9.07%	199	13.27%	100	6.67%	74	4.93%	30	2.00%		
17	Mt. Washington	6,760	3,661	54.16%	320	4.73%	183	2.71%	466	6.89%	601	8.89%	652	9.64%	877	12.97%		
30	North Avondale- Paddock Hills	2,285	1,070	46.83%	25	1.09%	146	6.39%	324	14.18%	180	7.88%	168	7.35%	372	16.28%		
40	North Fairmount- English Woods	1,743	673	38.61%	128	7.34%	89	5.11%	129	7.40%	448	25.70%	113	6.48%	163	9.35%		
34	Northside	4,046	2,035	50.30%	60	1.48%	705	17.42%	369	9.12%	240	5.93%	277	6.85%	360	8.90%		
22	Oakley	6,355	2,677	42.12%	195	3.07%	874	13.75%	785	12.35%	403	6.34%	587	9.24%	834	13.12%		
4	Over-the-Rhine	3,619	113	3.12%	42	1.16%	290	8.01%	897	24.79%	1,472	40.67%	382	10.56%	423	11.69%		
24	Pleasant Ridge	4,439	2,177	49.04%	79	1.78%	425	9.57%	755	17.01%	329	7.41%	414	9.33%	260	5.86%		
1	Queensgate	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		
47	Riverside-Sayler Park	641	262	40.87%	18	2.81%	56	8.74%	21	3.28%	62	9.67%	139	21.68%	83	12.95%		
28	Roselawn	3,424	1,207	35.25%	143	4.18%	223	6.51%	852	24.88%	210	6.13%	154	4.50%	635	18.55%		
48	Sayler Park	1,250	848	67.84%	27	2.16%	96	7.68%	66	5.28%	124	9.92%	75	6.00%	14	1.12%		
46	Sedamsville-Riverside	744	405	54.44%	32	4.30%	103	13.84%	80	10.75%	14	1.88%	102	13.71%	8	1.08%		
35	South Cumminsville- Millvale	1,423	489	34.36%	304	21.36%	74	5.20%	94	6.61%	169	11.88%	100	7.03%	193	13.56%		
41	South Fairmount	1,281	558	43.56%	57	4.45%	143	11.16%	117	9.13%	58	4.53%	119	9.29%	229	17.88%		
9	University Heights	3,285	418	12.72%	28	0.85%	375	11.42%	285	8.68%	322	9.80%	509	15.49%	1,348	41.04%		
11	Walnut Hills	3,816	503	13.18%	195	5.11%	383	10.04%	669	17.53%	574	15.04%	522	13.68%	970	25.42%		
44	West Price Hill	7,658	4,185	54.65%	68	0.89%	1,389	18.14%	651	8.50%	241	3.15%	663	8.66%	461	6.02%		
2	West End	4,002	269	6.72%	344	8.60%	219	5.47%	506	12.64%	896	22.39%	616	15.39%	1,152	28.79%		
45	Westwood	16,723	6,381	38.16%	293	1.75%	1,179	7.05%	2,128	12.72%	1,536	9.18%	3,449	20.62%	1,757	10.51%		
36	Winton Hills	2,024	183	9.04%	434	21.44%	24	1.19%	306	15.12%	549	27.12%	67	3.31%	461	22.78%		
33	Winton Place	957	607	63.43%	13	1.36%	125	13.06%	45	4.70%	19	1.99%	52	5.43%	96	10.03%		
	City of Cincinnati	147,814	56,364	38.13%	4,945	3.35%	14,947	10.11%	19,184	12.98%	15,082	10.20%	15,725	10.64%	21,567	14.59%		

* Percentages for each housing type that exceed the City average are highlighted. SNA's that are LMI eligible are also highlighted.

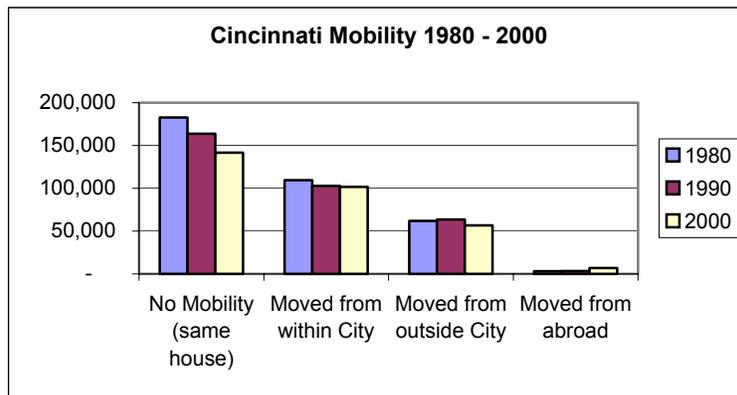
Mobility (Migration)

The number of City residents who have lived in the same house for the last five years (who have no mobility) has decreased by 22% over the last 20 years. There have also been decreases in the number of people who have moved within Cincinnati or into the City from the rest of the United States. The only category that has been moving into the City are

those residents who have moved from abroad (from outside the country). As discussed earlier, U.S. Census population estimates show that the total population of Cincinnati has increased slightly between 2000 and 2007. Unfortunately, updated information on mobility patterns will not be available until data associated with the 2010 U.S. Census is released.

Mobility (Migration)

City of Cincinnati	Percent Change 1980 - 2000
No Mobility (same house)	-22%
Moved from within City	-7%
Moved from outside City	-8%
Moved from abroad	119%



Age of Housing Stock

The housing stock of Cincinnati is dominated by units that were constructed more than fifty years ago. The median year of construction for housing units is 1948. Two in five housing units were constructed before 1939. Less than 3 percent of the City’s housing units were constructed in the last 18 years and less than 7 percent was constructed in the last 28 years. The age of Cincinnati’s housing stock creates unique challenges in ensuring housing is safe, affordable, and efficient. An older housing stock presents unique challenges in terms of the cost and ability of maintaining units and in ensuring that units are as energy efficient as possible.

Age of Housing Units

	Number	% of Total
Total:	165,945	
Built 1999 to March 2000	509	0.3%
Built 1995 to 1998	1,675	1.0%
Built 1990 to 1994	2,536	1.5%
Built 1980 to 1989	6,558	4.0%
Built 1970 to 1979	16,138	9.7%
Built 1960 to 1969	24,496	14.8%
Built 1950 to 1959	26,626	16.0%
Built 1940 to 1949	21,000	12.7%
Built 1939 or earlier	66,407	40.0%
Median Year Structure Built	1948	

Affordability

The following information is taken from the National Low Income Housing Coalition report *Out of Reach 2009*:

In Hamilton County, the Fair Market Rent (FMR) for a two-bedroom apartment is \$733. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$2,443 monthly or \$29,320 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$14.10.

In Hamilton County, a minimum wage worker earns an hourly wage of \$7.30. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 77 hours per week, 52 weeks per year. Or, a household must include 1.9 minimum wage earner(s) working 40 hours per week year-round in order to make the two bedroom FMR affordable.

In Hamilton County, the estimated mean (average) wage for a renter is \$14.34 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 39 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.0 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable.

Monthly Supplemental Security Income (SSI) payments for an individual are \$674 in Hamilton County. If SSI represents an individual's sole source of income, \$202 in monthly rent is affordable, while the FMR for a one-bedroom is \$566.

A unit is considered affordable if it costs no more than 30% of the renter's income.

The above report demonstrates that families with minimum wage earners may encounter difficulty in paying the fair market rent (FMR) for a housing unit. FMRs are used to determine income eligibility for programs including the Section 8 Housing Choice Voucher program and the Public Housing program.

When evaluating affordability, it is also important consider whether low- and moderate-income individuals and families are living in units that are affordable to them. Generally, a

housing unit is considered affordable when the gross rent, including rent and utilities, is no more than 30 percent of a household's income. Moderate income households are those with incomes 50 to 80 percent of the area median income (AMI); low income households are those incomes of 30 to 50 percent of AMI; and very-low income households have incomes of less than 30 percent AMI. The following State of the Cities Data Systems (SOCDS) Comprehensive Housing Affordability Data (CHAS) data shows the units that are affordable to households at certain income levels. It also shows certain housing characteristics, including occupant income, age of structure, and whether the units have problems (overcrowding; without a complete kitchen or plumbing facilities). For example, of the 2-bedroom units that are affordable to very-low income households, 58 percent of those units are actually occupied by households with a very-low income. The table is one indication that households, especially very-low, low, and moderate-income households may have difficulty finding an appropriately sized unit that is also affordable and without housing problems.

Affordability Mismatch for All Households

Housing Units by Affordability	Renters Units by # of bedrooms				Owned or for sale units by # of bedrooms			
	0-1 (A)	2 (B)	3+ (C)	Total (D)	0-1 (E)	2 (F)	3+ (G)	Total (H)
1. Rent <= 30%					Value <=30%			
# occupied units	12,800	6,530	4,570	23,900	# occupied units	N/A	N/A	N/A
%occupants <=30%	67.1	58	55.7	62.4	%occupants <=30%	N/A	N/A	N/A
%built before 1970	76.4	86.1	88.1	81.3	%built before 1970	N/A	N/A	N/A
%some problem	35.8	36.8	36.7	36.3	%some problem	N/A	N/A	N/A
#vacant for rent	1,970	1,360	780	4,110	#vacant for sale	N/A	N/A	N/A
2. Rent >30 to <=50%					Value <= 50%			
# occupied units	24,695	16,765	4,870	46,330	# occupied units	920	5,775	12,385
%occupants <=50%	51.2	44.6	46	48.3	%occupants <=30%	41.8	33.9	25.2
%built before 1970	76.9	74.5	86.2	77	%built before 1970	92.9	95.6	97.9
% some problem	38.2	35.6	42.3	37.7	%some problem	9.2	6.3	4
#vacant for rent	2,720	1,745	410	4,875	#vacant for sale	120	265	375
3. Rent >50 to <=80%					Value >50 to <=80%			
# occupied units	6,590	6,895	3,545	17,030	# occupied units	910	7,650	15,485
%occupants <=80%	58.5	46.9	61.9	54.5	%occupants <=30%	63.2	39.2	27.9
%built before 1970	74.7	77.2	83.4	77.5	%built before 1970	93.4	90.8	93.6
%some problem	40.4	35.9	53	41.2	%some problem	12.6	5.3	3.1
#vacant for rent	450	370	135	955	#vacant for sale	85	150	240
4. Rent >80%					Value >80%			
# occupied units	1,505	980	575	3,060	# occupied units	768	2,889	10,880
#vacant for rent	60	25	4	89	# vacant for sale	105	55	175

The age, condition, and tenure of the housing stock influences the use of funds for various programs aimed at expanding the diversity and quality of the housing stock and providing supportive services to individuals in finding and remaining in housing that is affordable, safe, and accessible. Programs aim to increase the homeownership rate through investment in housing unit construction and downpayment assistance. Programs are also available to help current owners remain in their homes through emergency mortgage assistance and housing maintenance services. The Rental Rehabilitation Program is used to improve the quality of rental housing to help address housing problems experienced by lower-income renters. See the *Summaries Workbook* for a complete listing of housing programs and associated objectives aimed at improving the housing stock.

SPECIFIC HOUSING OBJECTIVES (91.215 (b))

The Consolidated Plan includes two goals to address housing needs:

Housing Goal 1: Expand the diversity and quality of the housing stock.

Housing Goal 2: Provide supportive services to assist moderate, low and very low-income persons in finding and remaining in housing that is affordable, safe, and accessible.

Specific objectives to achieve both of these goals are included in *2010-2014 Consolidated Plan Recommendations* (page 4). Performance measures, including housing unit and household five-year targets, for each of the objectives are included in the *Summaries Workbook (CPMP Tool)*.

The City plans to accomplish these goals and objectives through housing programs such as the Strategic Housing Initiatives Program, the Rental Rehabilitation Program, the Tap and Permit Fee assistance for Habitat for Humanity housing units, and the Housing Maintenance Services Program. These programs are the primary way the City strives to foster and maintain affordable housing. Funding levels for these programs are contained in the *Recommended Consolidated Plan Budget*.

NEEDS OF PUBLIC HOUSING (91.210 (b))

PUBLIC HOUSING UNITS, VOUCHERS, AND WAITING LISTS

The following information is from CMHA's *Annual Plan for the Fiscal Year 2009*. The Cincinnati Metropolitan Housing Authority (CMHA) has an inventory of 5,293 public housing units. CMHA has 10,500 Housing Choice Vouchers (HCV). There are 1,192 families on the public housing waiting list. The majority of these are extremely low income (less than 30% AMI) (82.54%) African American (85.57%) families with children (60.82%). There are 9,214 families on the Section 8 tenant-based assistance waiting list. Most of these are also extremely low income (76.56%) African American (94.83%) families with children (73.58%). The waiting lists maintained by CMHA, especially the waiting list for HCV, most of which is scattered site housing, demonstrates the immense need for affordable housing, especially for those at the lowest income levels.

PUBLIC HOUSING STRATEGY (91.210)

The City's Section 8 Tenant Counseling and Placement program assists Section 8 voucher holders in securing housing in low poverty neighborhoods.

The following goals and objectives were identified by CMHA in the *Annual Plan for the Fiscal Year 2009*:

- Improve Public Housing Management: (PHAS score) Continue to Improve PHAS score and return to High Performer Status
Improve Voucher Management: (SEMAP score) Continue to Improve SEMAP score and maintain High Performer Status

- Increase customer satisfaction: Ongoing
- Concentrate on efforts to improve specific management functions:
 - Train staff concerning SEMAP, PHAS, and other HUD regulations.
 - Review existing policies and procedures to incorporate all necessary requirements and if warranted, develop written recommendations for policy revisions to the Board of Commissioners.
 - Increase employee training to improve working knowledge of systems and processes.
 - Develop working standards and processes that are consistent in each office.
 - Procure and implement a document imaging program throughout the agency.
 - Procure and implement the use of handheld inspection devices for the Housing Management Division.
 - Procure and implement the use of electronic handheld work order devices for the 10 percent of the maintenance staff.
 - Review current delivery of services to measure their effectiveness.
 - Reduce the amount of time it takes to respond and make routine repairs requested by customers.
 - Achieve 98% occupancy rate in elderly communities.
 - Promote resident and resident organization activities in the areas of resident organization, board training, leadership training, fire safety, child safety, and health.
 - CMHA continues to provide training to staff and Board Commissioners relative to any new or revised policy or procedure mandated by HUD.
 - Submit an Elderly Designation Plan for Regal Manor and Baldwin Grove.
- Renovate or modernize public housing units:
 - Implement the Capital Fund Program schedule.
 - CMHA will perform routine maintenance to assure that units are within UPCS compliance.
 - CMHA will implement a sound preventive maintenance program to help extend the useful life of all systems and equipment.
 - Design a data base using Microsoft Access for the Modernization Department that will track projects, create product life expectancy tables, queries, forms, and reports to aid the agency in efficient use of Capital Funds.
 - Complete 100% of scheduled fiscal year renovation projects on budget and on schedule.

- Identify staffing levels needed to address maintenance issues and PHAS Physical
- Management Scores through predictive and preventive preservation strategies.
- Complete an up to date Physical Needs Assessment of the agencies properties to help identify widespread/ systemic deficiencies.

BARRIERS TO AFFORDABLE HOUSING (91.210(e) and 91.215(f))

Several Cincinnati policies may have the unintended consequence of increasing the cost of developing affordable housing units. These policies are consistent with the basic federal statute goal of creating a suitable living environment by reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for lower income persons and revitalization of deteriorating neighborhoods.

The Impaction Ordinance (346-2001), passed by City Council in 2001, requires, in the budgeting of CDBG and HOME Investment Partnership program funds and in the approval of low income tax credit projects, opposition of "the construction of new publicly-assisted low-income rental units unless the construction reduces the concentration of poverty or are intended for occupancy by the elderly." The Housing Advisory Council (HAC) recommendations, developed in 2004, includes an objective of increasing the number of affordable rental units in areas where few similar units exist with the rationale that "increasing affordable rental units in such communities will give low to moderate-income families additional housing choices and reduce concentration pressures on communities with a disproportionate share of affordable housing." The Cincinnati Metropolitan Housing Authority (CMHA) is also looking for opportunities to purchase properties in low-poverty neighborhoods that currently have few assisted units.

While these policies are consistent with the goal of creating a more suitable living environment for lower income families and individuals, creation of housing units in higher income communities will cost more to develop due to land prices and will likely take longer to develop due to community opposition or hesitancy to house lower income individuals and families.

The City of Cincinnati and Hamilton County jointly requested that Housing Opportunities Made Equal (HOME), a Fair Housing Agency, conduct an Analysis of Impediments to Fair Housing (AI) update for the City and County jurisdictions. The AI was completed in May 2009, and in the AI, 18 recommendations were made to respond to the issues of 1) NIMBYism based on stereotypes, 2) Improving choice in the Housing Choice Voucher Program, 3) Predatory Lending and Lending Discrimination, 4) Discrimination Against People with Disabilities, 5) a Lack of Accessible Housing, 6) Discrimination Against Families with Children, and 7) Sexual Harassment. The City and County then began a series of meetings with a working group made up of staff from the Department of City Planning and Buildings, Office of Budget and Evaluation, the Department of Community Development, and the Hamilton County Department of Community Development, to address the report and its recommendations. It is the intent of this working group to form a Fair Housing Committee, beginning in early 2010, to more fully vet the recommendations, and advise the City and County on ways to implement the recommendations.

The initial responses of the City and County to these recommendations are as follows:

NIMBYism ("Not In My Backyard" reaction) based on Stereotypes

- 1) The City and County need to work with the Cincinnati Metropolitan Housing Authority (CMHA) to provide accurate information about the Housing Choice Voucher Program, including how the program works, the percentage of elderly and disabled people on the program, and the percentage employed. The communities also need accurate information on comparative rates of assisted housing concentration.

Currently the Housing Authority keeps statistics on their clientele, including statistics on numbers of elderly, disabled, and employed receiving assistance. This information is brought to the public's attention occasionally, when prompted. In addition, the local HUD office maintains a spreadsheet showing assisted housing by community and neighborhood in the City and County. The City and County would like to work with the Housing Authority and HUD to disseminate this information more widely. This could be done through a media campaign, or through other venues such as housing workshops. Assistance from the Fair Housing Committee, to be formed by the City and County, will be needed in this regard.

- 2) The City and County should support, encourage, and participate with neighborhood groups who value inclusion and welcome new neighbors.

The City and County support this recommendation, and welcome assistance from the Fair Housing Committee to help implement it. Currently the City's Neighborhood Summit and the County's First Suburbs meetings provide venues for this initiative.

- 3) The Cincinnati Planning Department and the Hamilton County Regional Planning Commission could take the lead in creating a positive image of diverse, mixed income communities.

The City and County support this recommendation, and welcome assistance from the Fair Housing Committee and the corresponding departments to help implement it. Currently the City's Neighborhood Summit, the County's First Suburbs meetings, and the Affordable Housing Advocates annual meeting provide venues for this initiative.

- 4) Elected officials and candidates should be asked to sign a pledge to refrain from inflaming racism and prejudice and to show respect for all citizens and their neighborhoods in campaign advertising and rhetoric.

The City and County support this recommendation, and welcome assistance from groups such as the Affordable Housing Advocates, the League of Women Voters, and other to help implement it.

Improve the Choice in the Housing Choice Voucher Program

- 5) CMHA, the City, and the County should collaborate on an active program to recruit landlords in low poverty areas and provide information and support to families with Section 8 Vouchers interested in making integrative moves.

The City currently provides funding to HOME to provide counseling assistance to Voucher holders to find units in low poverty areas, and to recruit landlords in these areas. The County had provided funding in the past under its Section 8 Program, but no longer operates that program. It may be difficult to provide additional funding from the City or County due to public service limits on the CDBG Program funds, but that can be explored. The County operates a tenant based assistance program with

HOME funds, and recruits landlords for that program to a small extent. The City, County, and CMHA could form a working group to discuss this collaboration, and what funding may be provided from other funding sources to implement it.

- 6) The City and County should ask CMHA to refrain from actions that limit housing choice such as using tenant-based vouchers to create project-based units or seeking ways to restrict access to certain neighborhoods.

As referenced in the response to recommendation # 5, a working group made up of City, County, and CMHA representatives, along with some other stakeholders, could discuss what limitations that the Housing Authority can or cannot make, the reasons behind these actions, and what incentives they can implement to expand housing choice.

- 7) The City and County should involve Section 8 tenants in community meetings, including upcoming meetings to develop a Cincinnati Comprehensive Plan and community meetings to discuss community development funding.

The City and County are supportive of this recommendation, and normally include a representative of either the Housing Choice Voucher (HCV) Program, or other CDBG or HOME funded program on their respective committees, such as the City's Community Development Advisory Board (CDAB), or the County's Community Development Advisory Committee (CDAC). In addition, now that the Tenants United for Truth group has been formed, made up of HCV clients, the City and County can invite this group to participate and comment on various plans and funding recommendations.

- 8) The City and County should work with CMHA to establish a Community Advisory Committee that includes Section 8 tenants and advocates, landlords, and representatives of communities concerned about the impact of families with Vouchers moving to their neighborhoods.

The City and County support this recommendation, and have expressed an interest in serving on such a committee. The City and County will take action to encourage CMHA to form such a group.

Predatory Lending and Lending Discrimination

- 9) Assertive law enforcement action is needed on fraudulent foreclosure prevention scams, the next generation of predatory lending that is targeting minority communities.

The City and County support this recommendation, and will support initiatives that will assist in this effort.

- 10) The City and County should ask the banks in Hamilton County to review their HMDA data, and where racial disparities exist to conduct self-testing and establish Mortgage Review Committees to ensure that loan originators and underwriters are not letting stereotypes and prejudice affect their decisions.

The City and County support this recommendation, and will search for the appropriate venue or program to undertake this effort. This could be brought up in the context of CRA requirements.

- 11) The City and County should work with major lenders to place more branches in minority and low- and moderate-income neighborhoods.

The City and County support this recommendation, and will search for the appropriate venue or program to undertake this effort. This could be brought up in the context of CRA requirements.

Discrimination against People with Mental Disabilities

- 12) Training needs to be provided to government officials and local zoning boards in Hamilton County on the Fair Housing Act rights of people with disabilities and the liability of jurisdictions who violate the law.

The City and County support this recommendation. Currently, training is provided by H.O.M.E. to County personnel as needed. This effort could be expanded to include more County staff, City staff, and staff of other local zoning boards. The City and County welcome assistance from the Fair Housing Committee to help implement this initiative.

- 13) The City Planning Department and Hamilton County Regional Planning Commission should provide sighting assistance programs that enable the sighting of special needs housing by providing community education, dispute resolution services, and tools such as Good Neighbor Agreements.

The City and County support this recommendation, and welcome assistance from the Fair Housing Committee and the corresponding departments to help implement this initiative.

A Lack of Accessible Housing

- 14) When the City and County issue occupancy certificates for new multifamily buildings, the inspectors should ensure that the minimal accessibility requirements of the Fair Housing Act are met. Additional training is needed to ensure the inspectors understand that under the Fair Housing Act and the Ohio Building Code, regardless of how units in covered multifamily buildings are classified, they must be minimally accessible to persons with mobility impairments.

The City and County support this recommendation, and will work with H.O.M.E. and other trainers and the corresponding departments of the City and County to implement this initiative.

- 15) The City and the County should expand their programs that provide accessibility modifications for existing housing to serve renters as well as homeowners.

The City and County support this recommendation, and will look into funding availability and research program design, to determine the feasibility of this program. The City and County will work with organizations that assist renters with disabilities to determine need, scope, and final program design.

- 16) Information on accessible rental units needs to be made more readily available.

The City and County support this recommendation, and welcome input from the Fair Housing Committee and organizations that assist persons with disabilities, to implement this recommendation. The County currently encourages use of

HousingLocator.org for clients in the Tenant Based Rental Assistance Program, which can note this in the database.

Discrimination against Families with Children

- 17) A significant marketing campaign could open the housing market to families by raising public awareness that housing discrimination against families with children is illegal. It would encourage parents who experience discrimination to call HOME and would educate the small landlords who receive no professional training.

The City and County support this recommendation, and welcome input from the Fair Housing Committee, and Affordable Housing Advocates, to implement this initiative.

Sexual Harassment

- 18) Educate female tenants that sexual harassment by landlords is illegal and should be reported to HOME. Target the message to female university students and Section 8 tenants who are particularly vulnerable because of their age and low-income.

The City and County support this recommendation, and welcome input from the Fair Housing Committee, and Affordable Housing Advocates, to implement this initiative.

The City will continue to explore ways to promote access to affordable, safe, and accessible housing through homeownership housing development, rental housing development, homeownership support services, renters supportive services, and services that promote fair housing.

HOMELESS

HOMELESS NEEDS (91.205 (b) and 91.215 (c))

The Homeless Section of the Consolidated Plan has been developed for both the City of Cincinnati and Hamilton County, Ohio as part of the Continuum of Care for the Homeless (CoC) program of the combined jurisdictions. Pursuant to HUD's guidance and the communities method of conducting planning and facilitating processes for homeless, the jurisdictions have standardized elements contained in the Consolidated Plan and the Continuum of Care Plan housing and services, linking the two documents and plans, and thereby reducing duplication of effort and mainstreaming resources.

The CoC maintains the Homeless Management Information System (HMIS), utilizing VESTA® software as the data base for all homeless housing and service delivery information within the jurisdiction. The Cincinnati/Hamilton County HMIS program has 100% community participation – meaning data on all persons within all street outreach programs, all emergency shelter beds, all transitional housing beds, all permanent supportive housing beds and many specialized services (funded by HUD and privately funded) are included in HMIS/VESTA. Thus statistical information reported on homelessness within the jurisdiction generated from HMIS/VESTA has a high degree of accuracy.

Needs data was generated from HMIS/VESTA for the calendar year 2008. During that year 8,372 persons became homeless in Cincinnati and were serviced within a CoC program. Regardless of how many times a person was served by a program or how many programs that person entered they were only counted as one individual- generating an unduplicated participation count.

- All recorded persons in street outreach- 1,162
- All recorded persons who utilized an emergency shelter bed – 6,055
- All recorded persons who utilized a transitional housing bed – 1,117
- All recorded persons who utilized a permanent supportive housing bed - 1,653
- Unduplicated count of persons who utilized any one or more of the following: street outreach, emergency shelter and/or transitional housing - 7,221
- Unduplicated count of persons who utilized any one or more of the following: street outreach emergency shelter, transitional housing and permanent supportive housing - 8,372

Of the 7,221 persons served in outreach, shelter or transitional housing (those who are counted in the annual homeless count for HUD) their **household types** break out as follows:

Individual adult male	3,312	45.9%
Individual adult female	1,113	15.4%
Unaccompanied youth	693	9.6%
Adults in families with child(ren)	737	10.2%
Children in families with adults	1,366	18.9%

Racial Demographics

Federal standards emphasize self-reporting or self-identification as the preferred method of collecting data on race and ethnicity. Clients may select as many races as are applicable. Of the 7,221 homeless persons race was identified as follows:

Black/African American	4,997
White	1,944
White, Black/African American	113
Black/African American, American Indian/Alaskan Native	43
American Indian/Alaskan Native	34
Asian	15
Native Hawaiian/Pacific Islander	14
White, American Indian/Alaskan Native	14
Other multiracial	15
Unknown/client refused	32

Additionally 101 of the person’s identified above identified a Hispanic/Latino ethnicity. Of those, only 21 persons were identified as non-English speaking.

Families with Children (2,103 homeless children and adults in families):

- The number of families was 690;
- Single female heads of household: 86%;
- Single male heads of household: 4%;
- Families with more than one adult: 10%;
- Of the adults in homeless families – 33% were victims of domestic violence.

Chronically Homeless

By federal definition a chronically homeless person is an unaccompanied individual with a disabling condition who has either been continuously homeless for more than one year or who has had at least four episodes of homelessness in the past three years.

- Of those persons served in street outreach and/or emergency shelter programs, 1,685 met the chronic homeless definition.
- These chronically homeless persons (who make up 34% of all sheltered adults) accounted for almost one half of the bed-nights utilized in emergency shelters in 2008
- The special needs/disabling conditions of those chronically homeless individuals were:

Alcohol abuse	1,145	68%
Drug abuse	1,133	67%
Mental illness	961	57%
HIV	60	3%
Physical/sensory disability	534	31%
Developmental/cognitive disability	191	11%

- Many chronically homeless persons have more than one special need/disabling condition. A full 45% are dually diagnosed with both substance abuse (drug and/or alcohol) and mental illness.

Within Hamilton County, according to 2008 US Census Bureau figures, 13% of the county lives in poverty and within the City of Cincinnati itself that number rises to 21.9% of the population.

Further poverty statistics indicate:

Children below poverty level:

Cincinnati, Ohio:  36.0%

State:  18.1%

Poverty rate among high school graduates not in families:

Cincinnati:  20.8%

Ohio:  17.1%

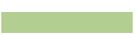
Poverty rate among people who did not graduate high school not in families:

Cincinnati:  46.4%

Ohio:  37.0%

Poverty rate among disabled males:

Cincinnati:  24.5%

Ohio:  13.8%

Disability rate in this city among poor males (it is 20.0% among residents who are not classified as poor):

Cincinnati:  28.7%

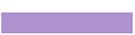
Ohio:  13.8%

Poverty rate among disabled females:

Cincinnati:  31.0%

Ohio:  18.7%

Disability rate in this city among poor females (it is 20.5% among residents who are not classified as poor):

Cincinnati:  31.1%

Ohio:  18.7%

Renting rate in this city among poor and not poor residents:

Residents below poverty level:  88.4%

Residents above poverty level:  54.0%

Each of these demographics, without regard to the current economic conditions, are indicators of households “at-risk of homelessness”.

The 2009 Point-in-Time Count, conducted on January 29, 2009 identifies the following persons as homeless on that night:

POINT-IN-TIME January 29, 2009	Sheltered		Unsheltered	Total
	Shelter	Transitional Housing		
Part 1: Homeless Population				
1. Number of Families with Children	55	59	0	114
1a. Total Number of Persons in Families with Children	169	190	0	359
2. Number of Households without Children	517	221	35	769
2a. Number of Persons in Households without Children	517	221	35	769
Total Persons (1a + 2a)	686	411	35	1,132
Part 2: Homeless Subpopulations	Sheltered		Unsheltered	Total
a. Chronically Homeless	262		6	268
b. Severely Mentally Ill	234			
c. Chronic Substance Abuse	410			
d. Veterans	139			
e. Persons with HIV/AIDS	19			
f. Victims of Domestic Viol.	201			
g. Unaccompanied Youth (under age 18)	6			
<p>Note: In the 48 hours prior to the street count, Cincinnati received 8 inches of snow and the low temperature was 19 degrees. For the first time, since the CoC began point-in-time counts in the late 1990's, weather conditions led the City of Cincinnati to open a Cold Shelter on the night of the count, possibly impacting the unsheltered number.</p>				

Facilities and Services for Homeless Families with Children

Facilities and services for homeless families begin in the emergency shelter system of the CoC. Since 1999 the family shelters have been part of a partnership program that has enabled them to:

- Share data and case planning across agencies
- Increase case management capability and competencies
- Forge a partnership with Hamilton County Job and Family Services to increase access and timely processing of all mainstream benefits/resources for families.
- Jointly develop the Central Access Point as the way for families to enter the system.
- Reduced recidivism rates
- Collaborate on a family homeless prevention program (one of 5 funded demonstrations in the state)
- Collaborate on a new Rapid Re-housing for Families (one of 23 funded demonstrations in 2008 CoC competition the country)

As is the norm across the county, family homelessness increases in the summer months and tends to decrease over the winter months, therefore, the Point in Time numbers taken in January show the lowest level of family shelter usage. At that low level 201 of the family beds available in the community, 84% were occupied. However, if that Point in Time would have been taken in July the family shelters would be 100% occupied, often with families waiting to gain admission to shelter. Data from the Central Access Point indicates the increasing number of families seeking emergency shelter is due to economic conditions and apartment foreclosures.

Considering the data and the efforts currently underway within the family system the following goals have been established:

1. MAINTAIN THE CURRENT LEVEL OF 201 PERMANENT SHELTER BEDS. With the exception of the domestic violence facilities (currently under renovation to increase its capacity by 9 beds), it is the continued belief of all persons involved in planning for family homelessness that permanent emergency shelter beds should not be added to the system.
2. INCREASE TEMPORARY EMERGENCY SHELTER BEDS FOR SEASONAL OVERFLOW AND BECAUSE OF POOR ECONOMIC CONDITIONS. A non-permanent emergency shelter system such as a hotel program may need to be established if the trend for the increasing need for emergency shelter beds for families continues, and the Hamilton County Department of Job and Family services cannot sustain the emergency hotel program previously operated by the department.
3. DECREASE THE LENGTH OF STAY WITHIN THE EMERGENCY SHELTER SYSTEM. The family shelters have refocused their energies to rapidly move families from the emergency shelter system into housing, thereby decreasing the amount of bed nights utilized in shelter.
 - a. The Rapid Re-housing for Families programs should be carefully monitored for success rates both in decreasing the length of stay within the shelter system and ensuring that recidivism rates do not rise as a result.

4. CREATE NEW SCATTERED-SITE TRANSITIONAL HOUSING BEDS FOR FAMILIES. A new rapid re-housing or scattered-site transitional housing program for families must be established to increase the ability of the shelter to move families from shelter to transitional housing (especially in light of decreasing opportunities for employment based on current conditions).
 - a. Implement the new Rapid Re-housing for Families program granted in 2008 by the CoC effectively providing an additional 60 units (180 bed) of transitional housing
 - b. Increase the number of "short-term" transitional units (6 to 9 month average) by 50 units (150 beds) over a five year period.
 - c. Increase the number of "longer-term" transitional housing (9 months to 2 years) for moderate to difficult family placement by 30 units (90 beds) over the five years.
5. CREATE NEW PERMANENT SUPPORTIVE HOUSING OPTIONS FOR FAMILIES. With the federal definitional change of chronic homelessness to include families, it will be possible within the next five years to create new PSH opportunities for families where the primary head-of-household is disabled and the family has experienced multiple episodes of homelessness.
 - a. Create 20 new PSH units (60 beds) for chronically homeless families.
 - b. Increase coordination with public housing and other federal programs to increase the supply of housing subsidies available for homeless families.

Facilities and Services for Single Homeless Individuals

In late 2008 the City of Cincinnati issued Ordinance 0347-2008 authorizing the CoC to develop a comprehensive strategic plan to ensure single homeless individuals have access to appropriate shelter facilities and comprehensive services which facilitate their movement from shelter to permanent housing. Over a six month period over 90 individuals participated in an intensive planning process. The completed plan, called the Homeless to Homes Plan, was accepted by both the City of Cincinnati and Hamilton County and provides the details for specific goal elements listed here that are relevant to the Consolidated Plan:

MAINTAIN THE CURRENT LEVEL OF EMERGENCY SHELTER BEDS, DECREASE THE CONCENTRATION OF SHELTER BEDS SO AS TO BETTER SERVE HOMELESS INDIVIDUALS, AND DECREASE THE LENGTH OF STAY IN SHELTER. Intensive work was done utilizing Homeless Management Information System data to determine the extent of the need and types of persons sheltered by age, sex, and disabilities. The results of that work documented that the current number of emergency shelter beds should be maintained, but that persons within the shelter system need to be provided with a higher level of service in order to facilitate movement from homelessness to permanent housing.

- a. Separate homeless single women's shelter beds from single men's beds.
- b. Decrease the concentration of emergency shelter beds.
- c. Decrease the ratio of case managers to clients to 1:10.

2. INCREASE THE NUMBER OF TRANSITIONAL HOUSING BEDS. Increasing the number transitional housing beds for single individuals will support the flow of persons out of emergency shelter and decrease the length of stay in shelter.
 - a. Increase the number of transitional housing beds for single individuals by 191 new beds over the five year period.
 - b. Utilize the bed type mix as identified in the Homeless to Homes Plan as the recommended level of units for each subpopulation.
3. INCREASE THE NUMBER OF PERMANENT SUPPORTIVE HOUSING UNITS AVAILABLE Increasing the number of permanent supportive housing units will decrease the number of chronically homeless persons in the community. An increase of 1,020 units over the next 5 years is recommended as the overall target.
 - a. Develop 125 site-based PSH units
 - b. Develop an additional 79 scattered-site PSH units
 - c. Create one PSH group home for the extremely long-term homeless women in the system.
4. MAINTAIN THE CURRENT LEVEL OF COORDINATION AND SERVICES FOR OUTREACH TO STREET HOMELESS PERSONS AND INCREASE THE LEVEL FOR YOUNG ADULTS AND PERSONS WITH SUBSTANCE ABUSE ISSUES
 - a. Expand the facility and services within Anthony House, an outreach and engagement center for young adults.
 - b. Increase the street outreach services for persons with substance abuse.

Improve Access into Service/Facilities

1. MAINTAIN AND EXPAND THE CENTRAL ACCESS POINT (CAP) The CAP program is currently designed to enable homeless families to gain access to emergency shelter or family homelessness prevention services. It is recommended that the CAP program be expanded to include the coordination and flow of single homeless individuals as well.
2. CREATE A PROGRAM/SYSTEM FOR HOMELESS INDIVIDUALS TO ACCESS INFORMATION AND REFERRAL SERVICES APPROPRIATE TO THEIR NEEDS Long identified as a need by Cincinnati's homeless population as a "homeless concierge" service – a place homeless persons could go to get connected with information and referral services. This recommendation was incorporated into the Homeless to Homes plan. The Information/Referral service should be connected with either an individual shelter or the Central Access Point.

PRIORITY HOMELESS NEEDS

As mentioned above, the Homeless to Homes Plan summarizes recommendations made by local and national experts in the homeless services field, local funders, and community stakeholders including representatives of service providers, government agencies, NGOs,

businesses, and faith-based organizations. The process for developing the plan constituted the first time in our region that a plan for ending homelessness used actual data of homeless persons in the community; real numbers, real ages, and real special needs became a foundation for the work. Because this plan was created using a “blank slate” problem solving method, it reflects what the steering committee and working subcommittees believe are the best of what could and should happen for homeless single individuals in the community.

The plan represents a significant shift in the ways our community responds to those who are homeless. The Homeless to Homes report responds to the need for a new, comprehensive plan that changes how our community provides homeless housing and services, how homeless individuals are expected to respond, and how public and private funding systems can work cooperatively and with a clear emphasis to support the initiatives of this plan.

As mandated by Cincinnati City Council on May 21, 2009, the Cincinnati/Hamilton County Continuum of Care for the Homeless, Inc. has seated the Homeless to Homes Transition Team, which has the task of prioritizing for implementation the over 50 recommendations within the Homeless to Homes Plan. This prioritization is ongoing, but should be completed and reported to the City, County, and community in September 2009 and will classify recommendations as follows:

- High Priority Recommendations- implementation to be begun in Year 1
- Years 2-3 Recommendations
- Years 4-5 Recommendations

Though the prioritization is not complete, the following items appear to be likely High Priority recommendations:

- Increase the number of Transitional Housing beds.
- Increase the number of Permanent Supportive Housing units.
- Development of a Central Access System to be used by homeless households to access emergency shelter, housing, and services.
- Decreasing the ratio of case managers to clients so as to provide a higher level of services.
- Restructure the current number of emergency shelter beds so as to better meet the needs of emergency shelter residents.
- Improve access to services through increased collaboration and coordination between CoC homeless services and the Mental Health and Recovery Services Board.
- Divert homeless people away from incarceration and toward transitional housing.

This prioritization is ongoing, but should be completed and reported to the City, County, and community in September 2009.

HOMELESS INVENTORY (91.210 (c))

See 2009 Housing Inventory Chart (Appendix III following page 22).

HOMELESS STRATEGIC PLAN (91.215 (c))

HOMELESSNESS

Cincinnati is a leader 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.

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 are now being 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.
2. Create a "safe walk-in shelter" with a limited number of beds to provide emergency refuge for single men or women would cannot or will not engage with workers to develop a case plan.

HOMELESS PREVENTION

The jurisdiction was selected in 2007 to undergo an evaluated state prevention program for homeless families. With that program as well as the Homeless Prevention and Rapid Re-housing Program (HPRP) stimulus funds, and normal community emergency assistance activities, the CoC has created the foundation for homeless prevention activities.

HPRP, the CoC and the United Way of Greater Cincinnati (UW) collaborated and they are using the UW funded Emergency Assistance centers plus one faith-based Emergency Assistance center as the Prevention Providers. The UW current funding within the agencies will be used for staffing while HPRP funds will provide direct financial assistance. Using a transformative prevention model, clients are provided both case management and prevention funds in sufficient quantities to make a sustainable difference in the households ability to sustain housing. The CoC has incorporated the HMIS (VESTA system) to acquire all data and pay all bills, in a consolidated administrative effort and as an outcome based measurement system. A sub- grant arrangement with the Legal Aid Society of Greater Cincinnati is being used to provide legal assistance as needed to prevent homelessness.

The City HPRP funds will provide: 74% of the direct financial assistance for Prevention, the salary of the back end financial management person to pay all bills and account for all funds and will provide all of their funds towards the RRH program. The County will provide: the balance of the direct financial assistance for Prevention; support Legal Services efforts to prevent homelessness; and support the Central Access Point "hotline" as a designated access call line for prevention and RRH for families.

INSTITUTIONAL STRUCTURE

The CoC planning process is a coordinated, collaborative effort by the City of Cincinnati, Hamilton County, the Greater Cincinnati Coalition for the Homeless, and the CoC Working Groups under the umbrella of the 501(c)3 –Cincinnati/Hamilton County Continuum of Care for the Homeless, Inc. (CoC, Inc.). The CoC, Inc. is the lead agency registered with HUD for the CoC annual grant application process and is the entity responsible for the submission of Exhibit 1. Over the course of the Consolidated Plan period this entity will also assume the responsibility for financial management of the grants pursuant to changes regulated by HUD.

The community leadership team, now known as the Homeless Clearinghouse, includes staff and members of: the City of Cincinnati Department of Community Development, Hamilton County Community Development Department, the Greater Cincinnati Coalition for the Homeless (GCCH), an elected representative liaison from each of the CoC Working Groups, as well as Executive Directors of four CoC-funded agencies. The Homeless Clearinghouse is staffed by the CoC, Inc. The Homeless Clearinghouse provides process oversight for the CoC, Inc. Board of Directors.

The purpose of the Homeless Clearinghouse is to:

1. Plan and coordinate community influence on systemic decisions affecting the homeless.
2. Uphold the elements of the Consolidated Plan that affect homelessness.
3. Identify and support the utilization of all sources of funds and other resources used to improve the quality of life for homeless persons and/or to end homelessness.

Planning itself occurs through the inclusive CoC process. The Working Groups of the CoC are groups focused on specific populations of homeless persons and/or specific types of providers. CoC Working Groups meet on a regular basis to address service-related issues. The Working Groups include not only the appropriate service/housing providers but also homeless persons, including those from the subpopulations identified in the committee's action plan, and system organizations that have an effect/influence over the target issue (e.g. welfare department, substance abuse board, social security, etc.) The groups report quarterly to the Homeless Clearinghouse. This system has provided the community with an improved level of coordination, community involvement and the ability to assure efforts in the community are not duplicated.

Working Group	Focus Area	Prime Activities
Family Shelter Partnership Program (FSPP)	Families in shelter	Coordinating quality case management Coordinating mainstream resources (TANF, FS, CHIP, Medicaid, Child Care, Children's Protective)
Homeless Individuals Task Force (HIT Force)	Homeless single individuals & chronically homeless	In process of being changed to correspond with Homeless to Homes planning and implementation efforts.
Homeless Outreach Group (HOG)	Street Homeless & chronically homeless	Coordinating outreach efforts Increasing access to housing/services directly from the streets
HMIS Advisory Committee	HMIS Quality and Integrity	Oversight of HMIS policies, procedures, system usage. Coordinates activities with the HMIS Lead Agency – The Partnership Center, Ltd.
Transitional Housing Group	SHP Transitional Housing	Promoting best TH practice efforts.
Permanent Housing Group	SHP Permanent Housing for the Disabled	Promoting best PSH service practice efforts.
PSH Development	Providing comprehensive planning and support to site based PSH	Coordination of site, development, funding among developers to implement PSH housing recommended in Homeless to Homes.
Shelter Plus Care	SPC excellence	Promoting best practices among SPC providers.

To ensure there are not duplicate efforts in coordination and planning, the City of Cincinnati contracts, on a year-round basis for the CoC, Inc. to manage both the Continuum and all other funding and administrative support for homeless services (including SPC, ESG and HOPWA), and the homeless section of the Consolidated Plan.

Planning/Coordination

- Maintain an "inclusive planning process"
- Facilitate Consolidated Planning and monitoring process (homeless section) for the City/County
- Facilitate Homeless to Homes Implementation

- Facilitate processes to include the voice of homeless persons in planning
- Maintain and staff the community planning/coordination body: *Homeless Clearinghouse*.
- Manage relationship with the Ohio Interagency Council on Homelessness and Housing.

Data Gathering/Sharing

- Manage contract with HMIS Lead Agency to ensure:
 - All homeless counts - as required by HUD or other community initiatives are completed with HMIS data
 - Provide data to local/state/federal governments and community providers to use
 - Provide the linkage for HMIS data government reporting
- Maintain and staff the *HMIS Advisory Committee*

Funding Coordination and Development

- Facilitate annual CoC process and grant submission to HUD
- Facilitate annual City-ESG process and coordinate grant requirements with the City
- Monitor funding, as required by funding source(s)
- Coordinate activities to support/develop community funding initiatives with HUD and other federal, state, local resources

Service Delivery System Intervention

- Monitor program outcomes and performance measures established by HUD and community processes.
- Facilitate/support initiatives that improve access to mainstream resources/services for the homeless
- Provide support for the creation of partnership initiatives/programs
- Provide support/coordination for CoC Working groups including whose focus is:
 - Provision of direct service for a specific population of homeless persons
 - Network information
 - Information sharing among providers
 - Gaps identification (directed to CoC planning and/or GCCH advocacy)

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 appropriate services and support to former foster care recipients. The services and supports are to compliment the young adult's own efforts and shall be available until the young adult's twenty-first birthday. Independent living services available to young adults aged eighteen to twenty-one include: daily living skills, assistance in obtaining a diploma or GED, entering post secondary 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.

Each county's protocol may be different as Ohio is a state supervised, county administered state. 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 thirty days of the completion of an assessment. The plan should be based upon the assessment and include input from the youth, the youth's case manager, the caregiver, and significant others in the youth's life. The independent living plan should be reviewed at least every ninety days thereafter 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 as prescribed above at age 16 or as they come into custody, using the Daniel Memorial Assessing and Contracting with Youth tool which provides for not only the assessments but 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 has 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]. As the licensing agency for these facilities, the Department of Health 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). The Department 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.

Although Ohio does not license hospitals, 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.

Locally, a protocol does exist for discharge of homeless persons from hospitals. The hospitals within Cincinnati and Hamilton County have joined together to fund the CoC's

Center for Respite Care, which was specifically designed for homeless individuals who were treated in the hospital and need additional medical support. The protocol developed and utilized throughout the hospitals in the area for admission to Respite requires the hospital to: a) have the hospital social worker provide referral information to Respite; b) Respite admissions staff evaluates patient data to determine if respite care is appropriate; c) hospital staff provides relevant medical background documentation (history, diagnosis, medical notes, discharge summary and treatment plan); d) hospital discharges to Respite with a 30 day supply of all prescribed medications and transports the patient to Respite. Respite has on staff, a trained Front Line Homeless Worker who then works with the patient to secure income and housing.

Mental Health Care

It is the policy of ODMH that homeless shelters are not appropriate living arrangements for persons with mental illness. Patients being discharged from ODMH Behavioral Health Organizations/Hospitals are not to be discharged to a shelter or to the street.

Community Support Network (CSN) programs are required to have appropriately approved 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 removed or 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 thoroughly 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.

COMMUNITY DEVELOPMENT

COMMUNITY DEVELOPMENT (91.215 (e))

OTHER COMMUNITY DEVELOPMENT NEEDS

Other community development needs include all needs not directly related to housing, homeless, and non-homeless special needs populations. Priority is given to those programs and activities that will have the most impact, in terms of geography and population served, to achieve the following specific objectives:

- Improve economic opportunities for low-income individuals

- Improve the quality and increase the quantity of public improvements for lower income persons
- Improve the quality and increase the quantity of neighborhood facilities for low-income persons
- Remediate and redevelop brownfields

Economy and Labor Force

Education, health, and social services make up the largest employment sector in the City, Hamilton County, and the Cincinnati-Hamilton, OH-KY-IN CMSA. In 2000, the sector employed nearly 35,000 people in the City. The second and third largest employment sectors in the City are Professional services, employing 18,756 individuals, followed by Manufacturing with 18,487 employees.

Employment by Sector, 2000

	Cincinnati, Ohio		Hamilton County, Ohio		Cincinnati--Hamilton, OH--KY--IN CMSA	
	Number	% of Total	Number	% of Total	Number	% of Total
Total:	150,574		405,192		968,170	
Agriculture, forestry, fishing and hunting, and mining:	184	0.1%	531	0.1%	4,082	0.4%
Agriculture, forestry, fishing and hunting	172	0.1%	468	0.1%	3,588	0.4%
Mining	12	0.0%	63	0.0%	494	0.1%
Construction	7,136	4.7%	22,526	5.6%	64,490	6.7%
Manufacturing	18,487	12.3%	58,732	14.5%	167,913	17.3%
Wholesale trade	4,512	3.0%	15,352	3.8%	38,507	4.0%
Retail trade	15,333	10.2%	46,163	11.4%	113,529	11.7%
Transportation and warehousing, and utilities:	7,143	4.7%	18,940	4.7%	53,792	5.6%
Transportation and warehousing	5,881	3.9%	15,385	3.8%	45,404	4.7%
Utilities	1,262	0.8%	3,555	0.9%	8,388	0.9%
Information	4,432	2.9%	11,238	2.8%	23,236	2.4%
Finance, insurance, real estate and rental and leasing:	11,029	7.3%	31,848	7.9%	72,310	7.5%
Finance and insurance	8,329	5.5%	24,164	6.0%	55,196	5.7%
Real estate and rental and leasing	2,700	1.8%	7,684	1.9%	17,114	1.8%
Professional, scientific, management, administrative, and waste management services:	18,746	12.4%	46,407	11.5%	95,365	9.9%
Professional, scientific, and technical services	11,263	7.5%	30,487	7.5%	62,050	6.4%
Management of companies and enterprises	191	0.1%	506	0.1%	1,016	0.1%
Administrative and support and waste management services	7,292	4.8%	15,414	3.8%	32,299	3.3%
Educational, health and social services:	34,899	23.2%	84,099	20.8%	181,331	18.7%
Educational services	13,445	8.9%	32,755	8.1%	74,536	7.7%
Health care and social assistance	21,454	14.2%	51,344	12.7%	106,795	11.0%
Arts, entertainment, recreation, accommodation and food services:	15,447	10.3%	34,716	8.6%	76,379	7.9%
Arts, entertainment, and recreation	3,179	2.1%	7,391	1.8%	15,963	1.6%
Accommodation and food services	12,268	8.1%	27,325	6.7%	60,416	6.2%
Other services (except public administration)	7,028	4.7%	18,570	4.6%	42,507	4.4%
Public administration	6,198	4.1%	16,070	4.0%	34,729	3.6%

While more current data for employment by sector is not available at the city-level, total employees by Major Standard Industrial Classification (SIC) data is available for 2009. This data cannot be directly compared with 2000 U.S. Census Bureau because the classifications are not identical, but the data does reveal that service industries dominate Cincinnati's economy, with more than 50 percent of all employees working in a service-related industry. Just over 40 percent of Hamilton County employees work in a service-related industry. It should also be noted that employment by sector data is based on the employed population over 16 years old living in a geographic area while employees by major SIC is based on employment within a geographic area.

Total Employees by Major SIC, 2009

	Cincinnati		Hamilton County	
	Total	%	Total	%
Agricultural, Forestry, Fishing (SIC Range 01-09)	680	0.3%	3,195	0.6%
Mining (SIC 10-14)	64	0.0%	107	0.0%
Construction (SIC 15-17)	6,124	2.5%	20,649	3.6%
Manufacturing (SIC 20-39)	18,785	7.6%	77,619	13.6%
Transportation and Communications (SIC 40-49)	16,655	6.8%	27,217	4.8%
Wholesale Trade (SIC 50-51)	9,441	3.8%	32,232	5.7%
Retail Trade (SIC 52-59)	31,404	12.8%	105,629	18.5%
Finance, Insurance And Real Estate (SIC 60-69)	20,771	8.5%	42,275	7.4%
Services (SIC 70-89)	125,510	51.1%	234,246	41.1%
Public Administration (SIC 90-98)	14,803	6.0%	23,080	4.1%
Unclassified (SIC 99)	1,408	0.6%	3,406	0.6%

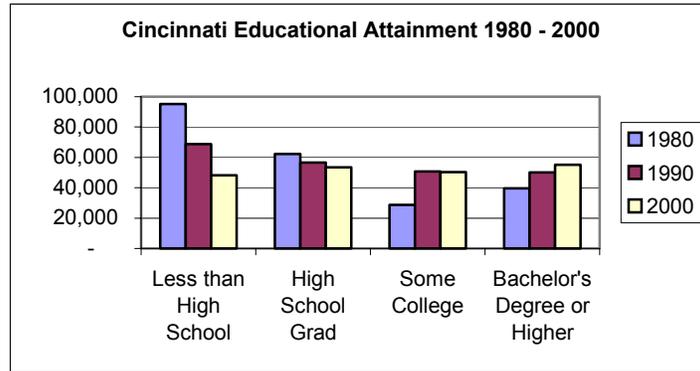
Unemployment

The most current employment numbers for the Cincinnati-Middletown Metropolitan Statistical Area (MSA) (including Brown, Butler, Clermont, Hamilton, and Warren Counties in Ohio; Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton in Kentucky; and Dearborn, Franklin, and Ohio counties in Indiana) indicate that the unemployment rate was 10.3 percent in July 2009. This was up from 6.2 percent in July 2008 and up from 10.1 percent in June 2008. These employment numbers are consistent with the current recession.

Educational Attainment

The levels of educational attainment of Cincinnati residents have increased over the last 20 years. There has been a 75% increase in the number of people who have attended some college and a 39% increase in the number of residents who have received a Bachelor’s Degree or higher. There have been significant increases in educational attainment of residents in LMI neighborhoods, and the number of residents without a high school education has dropped by 19 %. However, there is still a very large percentage of residents who have not obtained a high school degree, and school enrollment levels have dropped slightly among elementary and high school students.

Educational Attainment



The City of Cincinnati's population has a lower education level when compared with Hamilton County. While the percentage of population with a high school diploma, some college, or a college degree are comparable in 2009, more than 15 percent of Cincinnati's population does not have a high school degree, while just over 11 percent of the County's population does not have the same degree. This means that more than 32,186 residents have relatively low education levels and may not be properly prepared to compete in the workforce.

Educational Attainment Levels, 2009

	2009			
	Cincinnati		Hamilton County	
	Total	%	Total	%
Population Age 25+	211,841		583,847	
< Grade 9	8,115	3.8%	17,210	2.9%
Grade 9-12	24,071	11.4%	49,177	8.4%
High School	60,809	28.7%	173,770	29.8%
Some College	37,593	17.7%	104,867	18.0%
Assoc Degree	13,083	6.2%	40,378	6.9%
Bach Degree	40,797	19.3%	122,152	20.9%
Grad Degree	27,373	12.9%	76,293	13.1%

Educational Attainment Levels, 2014

	2014 Projection			
	Cincinnati		Hamilton County	
	Total	%	Total	%
Population Age 25+	236,989		655,285	
< Grade 9	7,222	3.0%	15,626	2.4%
Grade 9-12	21,424	9.0%	44,693	6.8%
High School	66,232	27.9%	188,241	28.7%
Some College	41,832	17.7%	116,366	17.8%
Assoc Degree	14,422	6.1%	43,980	6.7%
Bach Degree	49,881	21.0%	147,139	22.5%
Grad Degree	35,977	15.2%	99,240	15.1%

Projections for 2014 show that Cincinnati’s educational attainment level will increase slightly, but will still lag behind the County’s level.

Business Establishments

In 2009, Cincinnati has approximately 245,644 employees in 13,759 business establishments. The majority of these businesses (8,033 establishments making up 58.4% of all establishments) have 1 to 4 employees. Less than 1 percent of all establishments have more than 250 employees.

Business Establishments by Size, City of Cincinnati, 2009

	Total	%
1-4 Employees	8,033	58.4%
5-9 Employees	2,429	17.7%
10-19 Employees	1,394	10.1%
20-49 Employees	1,047	7.6%
50-99 Employees	450	3.3%
100-249 Employees	278	2.0%
250-499 Employees	73	0.5%
500-999 Employees	27	0.2%
1000+ Employees	28	0.2%

Economic Development

The City of Cincinnati is in competition for economic investment and jobs with the surrounding suburbs and jurisdictions, including those in Kentucky and Indiana. Several of these offer a plentiful supply of undeveloped land and less expensive office and retail space. Industrial and commercial development is often easier at the region’s periphery than at its core. Suburban developments are typically greenfield development in contrast with available land in the City, which tends to present a number of challenges to investors and developers including the costs of assembling properties, rebuilding aging infrastructure, demolition, and dealing with environmental hazards on brownfield sites. Cincinnati’s many neighborhood business districts, often the organizing spine of many communities, also face challenges, including competition with nearby or large-scale retail and office uses. Some of the issues the City faces in redevelopment include the following:

- Environmentally damaged land is a serious problem and remediation can be a major financial barrier or deterrent to redevelopment.
- Aging infrastructure and utilities in industrial areas can play a key role in decision-making for companies that are considering expansion, often leading them to consider relocation instead.
- Older built-out urban cities such as Cincinnati have little vacant land available for development, especially land at a larger scale of 20 acres or greater.
- Private developers generally need assistance assembling land because the land that is available are on mostly scattered, smaller parcels owned by several property owners.

- The physical impact of blight on a small neighborhood commercial districts can have a larger impact than in a larger commercial or industrial area.
- Potential entrepreneurs face barriers that involve a lack of assistance, difficulty securing financing, and discrimination.

Workforce Development and Access to Jobs

The City's potential workforce include a disproportionate share of the county and region's less well-off members in terms of education, job skills, and poverty level. An intergovernmental agreement between Cincinnati and Hamilton County pools Workforce Investment Act (WIA) and other Department of Labor grant programs into an integrated system with policy direction provided by the Southwest Ohio Region Workforce Investment Board.

The SuperJobs Center is a one-stop job center that provides services to job seekers and employers at no cost in one location. Hamilton County Job and Family Services, the Ohio Department of Job and Family Service, the Ohio Department of Development, the University of Cincinnati (Southwest Educational Opportunity Center), Cincinnati State Technical and Community College, Mature Services, Ohio Rehabilitation Services Commission, Job Corps, Cincinnati-Hamilton County Community Action Agency, Cincinnati Public Schools, and the Cincinnati Metropolitan Housing Authority are all partners of the SuperJobs Center. The SuperJobs Center is operated by the Southwest Ohio Region Workforce Investment Board in partnership with Arbor E&T, LLC and is supported by the City of Cincinnati and Hamilton County.

SuperJobs Center services will be enhanced by strategic CDBG-funded workforce development programs, including Blueprint for Success and Youth Employment Programs. Blueprint for Success is based on the Youth Build model to assist ex-offenders and at-risk youth in obtaining a high school diploma or equivalent as well as marketable construction skills. The Youth Employment Programs provide training for youth in work place etiquette and basic work skills through workshops, presentations, and job experience opportunities.

Other Community Development Needs

Two public processes that help the City of Cincinnati make community development funding decisions are focused towards the Neighborhood Business Districts and the community as a whole. Proposals for funding for neighborhood business district (NBD) improvements are made through a special process managed by the Department of Community Development and reviewed by the Cincinnati Neighborhood Business Districts United (CNBDU), an association of NBD members. The Community Priority Request (CPR) process asks each neighborhood community council for a list of its highest priority funding requests as part of the preparation for the biennial budget. The *Priority Community Development Needs* table reflects 2005-2009 CNBDU requests and 2007-2010 CPR requests. Please note, funding amounts most CPR projects do not include dollars needed to meet the need.

Quality of Life

The aging housing stock, the dominance of renter-occupied housing units, and relatively low income of Cincinnati's population combine to create several challenges in maintaining a good quality of life for all residents, and especially those that may be less well-off. An aging housing stock presents unique challenges in maintaining safe, and livable conditions. Often older housing units are concentrated in areas of the City dominated by lower income families. Cincinnati's housing stock is dominated by rental units. If absentee landlords are

unresponsive to housing conditions and tenant behavior, rental units may create negative impacts on the surrounding community.

Several programs are aimed at addressing issues of blight in neighborhoods and ensuring the continued public health, safety, and welfare of Cincinnati's neighborhoods. The Concentrated Code Enforcement Program provides funding to correct code violations. Funding through the program may involve repairing porches, windows, and siding; painting; and removal of dilapidated garages, fences and sheds, junk cars, and weeds. The Hazard Abatement Program addresses community eyesores and hazards by providing funds to barricade or repair abandoned buildings. Finally the Lead Hazard Testing Program provides funding for lead inspections of residences occupied by children who have been identified as having elevated blood levels. The program also provides access to services to remediate lead.

DETERMINING PRIORITY COMMUNITY DEVELOPMENT NEEDS

The following table includes unmet needs, dollars to address those needs, and five-year targets for non-housing community development needs. The table also assigns priority levels for various community development activities. The level of need for public facilities, infrastructure, and services not traditionally provided by the City of Cincinnati have been labeled "NA" (not applicable), as the City does not have a means for determining the need for those activities. Community development activities that have been assigned a high priority level directly improve economic opportunities for low-income individuals, improve the quality of public improvements for lower income individuals, and remediate and redevelop brownfields. Taken together, these activities have a direct positive impact on lower income individuals while also creating positive outcomes for the entire City.

Priority Community Development Needs

	Priority Need Level (High, Medium, Low)	Unmet Need	Dollars to Address Need	5-Year Goal
01 Acquisition of Real Property 570.201(a)	H	15	\$1,130,000	9
02 Disposition 570.201(b)	H	275	\$125,000	275
03 Public Facilities and Improvements (General) 570.201(c)	L	4	\$0	0
03A Senior Centers 570.201(c)			NA	
03B Handicapped Centers 570.201(c)			NA	
03C Homeless Facilities (not operating costs) 570.201(c)			NA	
03D Youth Centers 570.201(c)			NA	
03E Neighborhood Facilities 570.201(c)	L	11	\$0	0
03F Parks, Recreational Facilities 570.201(c)	M	30	\$4,781,500	5
03G Parking Facilities 570.201(c)	L	18	\$2,214,867	0
03H Solid Waste Disposal Improvements 570.201(c)			NA	
03I Flood Drain Improvements 570.201(c)			NA	
03J Water/Sewer Improvements 570.201(c)	L	5	\$588,500	0
03K Street Improvements 570.201(c)	H	500	\$21,599,969	425
03L Sidewalks 570.201(c)	L	4	\$140,500	0
03M Child Care Centers 570.201(c)			NA	
03N Tree Planting 570.201(c)	L	1	\$0	0
03O Fire Stations/Equipment 570.201(c)			NA	
03P Health Facilities 570.201(c)			NA	
03Q Abused and Neglected Children Facilities 570.201(c)			NA	
03R Asbestos Removal 570.201(c)			NA	
03S Facilities for AIDS Patients (not operating costs) 570.201(c)			NA	
03T Operating Costs of Homeless/AIDS Patients Programs	H	22,665	\$586,866	22,665
04 Clearance and Demolition 570.201(d)	H	3080	\$3,970,400	3,080
04A Clean-up of Contaminated Sites 570.201(d)	H	9	\$3,125,000	9
05 Public Services (General) 570.201(e)	M	19000	\$40,000	19,000
05A Senior Services 570.201(e)			NA	
05B Handicapped Services 570.201(e)			NA	
05C Legal Services 570.201(e)			NA	
05D Youth Services 570.201(e)			NA	
05E Transportation Services 570.201(e)			NA	
05F Substance Abuse Services 570.201(e)			NA	
05G Battered and Abused Spouses 570.201(e)			NA	
05H Employment Training 570.201(e)	H	2143	\$5,904,600	2,143
05I Crime Awareness 570.201(e)	L	2	\$0	0
05J Fair Housing Activities (if CDBG, then subject to 570.201(e))			NA	
05K Tenant/Landlord Counseling 570.201(e)			NA	
05L Child Care Services 570.201(e)			NA	
05M Health Services 570.201(e)	L	1	\$0	0
05N Abused and Neglected Children 570.201(e)			NA	
05O Mental Health Services 570.201(e)			NA	
05P Screening for Lead-Based Paint/Lead Hazards Poison 570.201(e)			NA	
05Q Subsistence Payments 570.204			NA	
05R Homeownership Assistance (not direct) 570.204			NA	
05S Rental Housing Subsidies (if HOME, not part of 5% 570.204)			NA	
05T Security Deposits (if HOME, not part of 5% Admin c)			NA	
14A Rehab; Single-Unit Residential 570.202			NA	
14B Rehab; Multi-Unit Residential 570.202			NA	
14C Public Housing Modernization 570.202			NA	
14D Rehab; Other Publicly-Owned Residential Buildings 570.202			NA	
14E Rehab; Publicly or Privately-Owned Commercial/Indu 570.202	M	27	\$6,928,192	1
14F Energy Efficiency Improvements 570.202			NA	
14G Acquisition - for Rehabilitation 570.202			NA	
14H Rehabilitation Administration 570.202			NA	
14I Lead-Based/Lead Hazard Test/Abate 570.202	H	705	\$3,825,000	705
15 Code Enforcement 570.202(c)	H	18,800	\$3,500,000	18,800
16A Residential Historic Preservation 570.202(d)			NA	
16B Non-Residential Historic Preservation 570.202(d)			NA	
17A CI Land Acquisition/Disposition 570.203(a)			NA	
17B CI Infrastructure Development 570.203(a)			NA	
17C CI Building Acquisition, Construction, Rehabilitat 570.203(a)			NA	
17D Other Commercial/Industrial Improvements 570.203(a)			NA	
18A ED Direct Financial Assistance to For-Profits 570.203(b)	H	30	\$1,000,000	30
18B ED Technical Assistance 570.203(b)	H	1000	\$1,500,000	1,000
18C Micro-Enterprise Assistance				0
19A HOME Admin/Planning Costs of PJ (not part of 5% Ad			NA	
19B HOME CHDO Operating Costs (not part of 5% Admin ca			NA	
19C CDBG Non-profit Organization Capacity Building	H	100	\$5,575,000	100
19D CDBG Assistance to Institutes of Higher Education			NA	
19E CDBG Operation and Repair of Foreclosed Property			NA	
19F Planned Repayment of Section 108 Loan Principal			NA	
19G Unplanned Repayment of Section 108 Loan Principal			NA	
19H State CDBG Technical Assistance to Grantees			NA	

OBSTACLES TO MEETING UNDERSERVED NEEDS

The greatest obstacle to serving underserved needs is funding. While the City has programs to address the full range of underserved needs, the amount of funding available for those programs is insufficient to produce outcomes that ensure the basic statutory goals for all Cincinnati residents, especially those with the most need.

SPECIFIC COMMUNITY DEVELOPMENT OBJECTIVES

The Consolidated Plan includes three goals to address community development needs:

Economic Development Goals

Economic Development Goal 1: Promote commercial and industrial development and redevelopment.

Economic Development Goal 2: Improve the economic conditions of people and organizations in order to promote business development and employment opportunities.

Quality of Life Goal

Quality of Life Goal: Promote sustainable neighborhoods through elimination of blighting influences and improved health and safety.

Specific objectives to achieve these goals are included in *2010-2014 Consolidated Plan Recommendations*. Performance measures, including business and persons assisted five-year targets, for each of the objectives are included in *Summaries Workbook (CPMP Tool)*.

The City plans to accomplish these goal and objectives through programs such as Blueprint for Success, Youth Employment Programs, Neighborhood Capacity Building and Technical Assistance, and the Neighborhood Improvement Program. These are the primary ways the City strives to provide decent housing, a suitable living environment, and expand economic opportunities, principally for low- and moderate-income persons. Funding levels for these programs are contained in the *Recommended Consolidated Plan Budget*.

ANTIPOVERTY STRATEGY (91.215 (h))

The City of Cincinnati primarily uses programs that promote business development opportunities, provide employment training, and increase financial literacy in its efforts to reduce the number of poverty level families and to reverse generational poverty. These programs include Small Business Services & Technical Assistance, Small Business Loan Fund (CSBLF), Earned Income Tax Credit Outreach and Financial Literacy, Neighborhood Building and Technical Assistance, Blueprint for Success, and Youth Employment Programs. For more details and the number of individuals served on these programs please refer to descriptions provided in the *Projects* workbook.

NON-HOMELESS SPECIAL NEEDS

NON-HOMELESS SPECIAL NEEDS

The Elderly

At the time of the 2000 Census, 40,654 persons in Cincinnati (12.3 percent) were age 65 or older. The elderly population has decreased approximately 27 percent in the City of Cincinnati since 1980, but with the aging of the baby boomers, this number may begin to rise around the year 2010.

In 2000, eight percent of older persons were living in group quarters, 89 percent of which were living in institutions. Of the total number of disabilities tallied in the City of Cincinnati, 29 percent were reported by persons over the age of 65. There were 28,920 householders age 65 or over. More than half (56 percent) were owners, meaning that elderly residents in Cincinnati are more likely to be homeowners than renters. In 2000, there were 5,596, or approximately 14 percent of the population, over the age of 65 living at or below the poverty level.

The frail elderly require counseling services to help them make decisions about whether to live independently and how to arrange their finances to help them do so. There has been an increase in predatory lending that makes this service more important than before. Home repairs and assistance in making units accessible can help the frail elderly maintain their independent living status for a longer period of time. A new City program, Compliance Assistance Repair for the Elderly (CARE), provides forgivable loans and grants to low income elderly homeowners to correct common exterior violations of the housing code. This assistance will help the elderly live independently longer.

Physical Impairments

Most of Cincinnati's housing stock is unsuited for persons with physical disabilities. In 2004, the Center for Independent Living Options (CILO) estimated that there was a need for a total of 29,000 accessible units. At the time of the 2000 Census, there were 121,824 disabilities reported in the City of Cincinnati. Of these 10 percent were sensory disabilities, 24 percent were physical disabilities, 16 percent were mental disabilities, 8 percent were self-care disabilities, 20 percent were go-outside-the-home disabilities, and 22 percent were employment disabilities.

Of those families on the public housing waiting list of the Cincinnati Metropolitan Housing Authority (CMHA), 101, or 8.47 percent have a disability. Of those on the waiting list for Section 8 tenant-based assistance, 262 families, or 2.84 percent have a disability.

CILO develops and continually updated and expands housing referral listings, including properties conventionally subsidized by the Department of Housing and Urban Development (HUD), subsidized by Section 8 certificates, and/or Tenant Based Assistance grants, as well market rentals.

Mental Retardation and Developmental Disabilities

The Hamilton County Developmental Disabilities Services has provided residential services since 1975 when it assumed operation of the Virginia Perin House. Residential services and support continue to be offered through contracts with outside agencies. The residential options available to assist those with disabilities include the following:

- Supportive Living: Identified supports are given to individuals in a family home or other living arrangement. Supported living is paid for MR/DD tax levy funds, State of Ohio supportive living funds, and income from individuals and families.
- Group Homes: Five to eight people live in a home with round-the-clock staff. The homes are funded by the Residential Facility Waiver (federal funds and State General Revenue funds that flow through the state to the county).
- Intermediate Care Facilities for the Mentally Retarded: These medical facilities must meet a standard level of care, set by federal and state officials.

- Independent Living: Individuals with MR/DD live independently with support from community case managers.
- Foster Care: Individuals live with caregivers in the caregiver's home.

Substance Abuse

The major funding agency for persons in Hamilton County who have substance abuse problems is the Hamilton County Alcohol and Drug Addiction Services (ADAS) board. The ADAS board funds agencies with a combined capacity of beds. While these beds do not meet the HUD definition of transitional housing for the homeless, they do represent transitional housing for people who are under-housed upon admission and who require placement upon discharge. ADAS allocates state and federal treatment and prevention dollars to the county to ten agencies.

Special Needs Strategy

The City's strategy for providing housing and services to the groups of Special Populations varies widely for one group to another. The City is the HUD grantee for HOPWA funds, meaning that the City of Cincinnati has a special responsibility to plan for the needs of the population of persons with HIV/AIDS and to oversee the allocation process. It does this through a representative regional body known as the HOPWA Advisory Committee. In contrast, it is the county that is responsible for programs in the areas of mental illness, mental retardation and substance abuse.

Many of the needs of these special populations touch on issues of homelessness. All services for persons in these special populations that involve emergency shelters, transitional housing, or permanent supportive housing have already been addressed in the sections of this plan that deal with homelessness.

With respect to HIV/AIDS the City will maintain the existing housing and service program through the existing networks of AIDS services providers and assist them in their continuing efforts to respond to the changing of demographics HIV/AIDS.

With respect to the frail elderly, the City will continue to support direct federal applications for elderly housing, support housing counseling programs that can assist elderly persons in maintaining independent living and protect them from predatory lenders. In addition, the City will continue to fund home repair services and accessibility improvements that can help elderly homeowners live independently.

With respect to persons with disabilities, the City will fund home repair services and accessibility improvements to allow such persons to live independently in units. The City currently provides this services for homeowners, and will determine if a similar program for renters is necessary and feasible.

With respect to all special populations, the City of Cincinnati will look for opportunities to have a significant impact on the ability of service providers to provide programming. Each year the City will assist a small number of agencies with support for renovations to public facilities that results in structural enhancements and modifications. Agencies to be assisted can include those dedicated to serving special populations and those that serve a wider range of persons but whose facilities are not accessible.

The City will consider using some of its housing dollars in partnership with non-profit agencies serving special populations to create additional service-enriched housing units for non-homeless persons.

The City of Cincinnati will look for opportunities to coordinate its funding allocations with Hamilton County in those areas where the county is the grantee for state or federal dollars dedicated to serving persons with mental retardation, developmental disabilities, serious mental illness or substance abuse problems.

The City would benefit from additional housing units for persons in any of these special populations and therefore will support applications for funding from HUD's supportive housing programs for the elderly (Section 202) and persons with disabilities (Section 811).

HOUSING OPPORTUNITIES FOR PEOPLE WITH AIDS (HOPWA)

HOPWA ACTIVITIES

The focus of the City's HOPWA Advisory Committee remains on maintaining the existing network of AIDS services providers and assist them in their continuing efforts to respond to the changing demographics of HIV/AIDS" through the following objectives:

- Provide operational support for 11 beds of congregate, transitional housing for persons with HIV/AIDS.
 - Caracole will continue to provide direct housing services at Caracole House, a congregate residence for those disabled or displaced by HIV/AIDS.
- Provide direct services for persons with HIV/AIDS, including housing assistance, supportive services and linkages to medical support.
 - Caracole will continue to provide supportive services to persons within their Shelter Plus Care program.
 - NKIDHD and STOP AIDS will continue to provide supportive services to persons receiving HOPWA short term rent mortgage and utility assistance (STRMU) and non-HOPWA short term housing assistance to assist in stabilizing the household and preventing future homelessness.
 - The Center for Respite Care will continue to provide supportive services to persons in their shelter to stabilize and assist them moving on to permanent housing situations.
- Provide STRMU to households with HIV/AIDS throughout the Greater Cincinnati EMSA to help them remain in independent living situations and maintain existing housing.

One of the primary obstacles facing each HOPWA provider today is the reduction of many funding sources, and the increasing strain on resources. As economic conditions have worsened over the past year, the need for assistance is greater and the availability of assistance has not necessarily kept pace. The network of HIV/AIDS case managers

(organized through the Greater Cincinnati AIDS Consortium) continues to work toward collaboration and maximizing the funds available for the low-income HIV/AIDS community.

HOPWA OUTPUT GOALS

See *Projects Workbook* (attached)

TARGET COMPLETION DATES (HOUSING FACILITY PROJECTS)

There are currently no additional housing facilities planned in the Greater Cincinnati EMSA.

FUND ALLOCATION

The HOPWA fund allocation process is an inclusive process of the HIV/AIDS community. To allocate funds in the Greater Cincinnati EMSA, an annual HOPWA Advisory Committee is convened which includes state HOPWA officials, Ryan White representatives, provider applicants, consumers, and advocacy organizations.

The Cincinnati EMSA includes 15 counties: five in Ohio, seven in Kentucky, and three in Indiana. The estimate of each county's need is determined by assessing the number of HIV/AIDS cases as a percentage of the total. This estimation of need is then applied as a guide for allocating funds. Since there is no Indiana sponsor agency, the Indiana portion is typically allocated to the Kentucky or Ohio agency that has committed to serving Indiana clients. Applications for HOPWA funds are reviewed and community decisions on allocations are made. Allocation recommendations are forwarded to the City of Cincinnati's Office of Budget and Evaluation for inclusion in the annual budget presented to City Council for final approval. The following are the recommended 2010 allocations for the City of Cincinnati EMSA:

Agency	Zip Codes for areas of activities	Recommended Budget	Faith Based?	Grass Roots?
Caracole	45002-45251	\$ 236,581.00	No	No
Center for Respite Care	45229	\$ 31,866.00	No	No
Northern Kentucky Independent Health District	41011, 41042, 41071, 41097, 41095, 41040, 41043, 47012, 47001, 47040	\$ 126,114.00	No	No
STOP AIDS	45202, 45014-45033 45205-45240	\$ 215,439.00	No	No
	Total	\$ 610,000.00		

LEAD JURISDICTION

In addition to the facilitation of the HOPWA application process, the City of Cincinnati contracts with the CoC, Inc. to facilitate year-round HOPWA processes, including monitoring programs for regulatory compliance. The CoC, Inc. reviews all grant billings for eligible expenses before they are submitted to the City of Cincinnati for payment. In addition to the grant billing review, CoC, Inc. staff site-monitor each agency at least annually. Agencies must demonstrate during the monitoring that funds are being used appropriately, and that eligible persons are being served.

SPECIFIC HOPWA OBJECTIVES

Each HOPWA provider agency brings leveraged resources to the table, and additionally, HOPWA funding provides valuable leverage to obtain other resources. Leveraged resources include: Ryan White Part B, HUD Supportive Housing Program, HUD Shelter Plus Care, HUD Emergency Shelter Grant, State HOPWA funds, Ohio Department of Development, Ohio Department of Health, United Way, and private hospitals and foundations.

OTHER NARRATIVE

Two reports are attached, the *Impediments to Fair Housing Choice in Hamilton County, Ohio* and the *Homeless to Homes* report.

The updated analysis of impediments to fair housing choice, the *Impediments to Fair Housing Choice in Hamilton County, Ohio*, was completed by Housing Opportunities Made Equal in May 2009 for both Hamilton County and the City of Cincinnati. The resulting recommendations are addressed in the *Barriers to Affordable Housing* (page 63) of this plan.

The *Homeless to Homes* report, completed by the Continuum of Care in March of 2009, is the basis for the homeless sections of this plan.

The Focus Group Input and comments on preliminary goals and objectives from Affordable Housing Advocates (AHA) referenced under the *Planning Process, Public Participation, and Consultation* section of this plan are also attached.