

City of Cincinnati 2026 Annual Action Plan

This draft version of the Annual Action Plan was published on April 13, 2026. Public comments on this document will be accepted via email at CMOGrantShared@cincinnati-oh.gov through May 13, 2026.



Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Cincinnati (City) is an entitlement jurisdiction that receives federal funds from the United States Department of Housing and Urban Development (HUD) to support local community development and affordable housing activities. The federal block grant programs that provide these resources include the Community Development Block Grant (CDBG), the HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant (ESG), and the Housing Opportunities for Persons With HIV/AIDS Grant (HOPWA). As a condition of receiving these funds, the City of Cincinnati is required to submit a 5-Year Consolidated Plan, which outlines the city's housing and community development needs and priorities, and the First Year Annual Action Plan (budget) that identifies how the City plans to allocate its HUD funding to address those priority needs. HUD determines the amount of each grant by using a formula comprised of several measures of community need, including the extent of poverty, population, housing overcrowding, age of housing, and population growth lag in relationship to other metropolitan areas.

The 2026 Annual Action Plan City is the result of a collaborative process to identify housing and community development needs and to establish goals, priorities, and strategies to address those needs, especially for low- and moderate-income households. The process serves as the framework for a community-wide dialogue to better focus funding from the U.S. Department of Housing and Urban Development formula block grant programs to meet local needs. T

The 2026 Annual Action Plan was created with the input and active participation of over 1,600 people, including an online community survey, stakeholder meetings, internal staff meetings with various divisions and departments, City Council input, HOPWA Advisory Board, Prince of Peace ESG Allocation Committee, and the Community Development Advisory Board (CDAB). A broad cross-section of the community was represented in these efforts.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City's Five-Year Goals, Objectives and Related Outcomes are outlined in 2025 – 2029 Strategic Plan. These goals, objectives and outcomes were selected based on community priorities, prior performance evaluations, the needs assessment, the housing market analysis, the City's Quality of Life survey conducted in Fall 2024, and Plan Cincinnati, which is the City's comprehensive plan adopted in 2012. Top priorities for each grant are highlighted below:

Goals:

1. Thriving Neighborhoods: Housing & Building Quality
2. Growing Economic Opportunity
3. Neighborhood Improvements and Public Safety
4. Homeless Services
5. Special Needs

- CDBG programs: Housing and Building Quality Programs; Reducing poverty through employment training and economic self-sufficiency programs; Maintain and improve the quantity and quality of affordable housing for low to moderate income homeowners and renters; Commercial and industrial redevelopment; and Public service activities and supportive services for low to moderate income persons and persons experiencing homelessness.
- HOME programs: Expand, maintain, and improve the quantity and quality of affordable housing for very low and extremely low-income individuals; Down payment assistance for low to moderate-income first-time home buyers; and Operating support for non-profits creating affordable housing.
- Both ESG and HOPWA programs are evaluated by cooperative processes managed by the Continuum of Care, Strategies to End Homelessness (STEh). A consortium meets to review programs and services and recommend funding levels for each respective Annual Action Plan.

ESG Programs:

- Up to 60% of the ESG funding is set aside for Emergency Shelter and Street Outreach Projects to address the needs of persons experiencing literal/Category 1 homelessness ;
- Homelessness Prevention services receive the balance of the funding to prevent households from becoming Category 1 homeless.

HOPWA programs may apply for the following eligible activities, which are prioritized by the HOPWA Advisory Committee:

- Operating support for housing facilities for persons with HIV/AIDS;

- Housing assistance through Short-Term Rent Mortgage and Utility (STRMU) payments,
- Tenant Based Rental Assistance (TBRA) and permanent housing placement;
- Supportive services including case management;
- Medical respite care for homeless persons with HIV/AIDS. The Consolidated Plan priorities factored in the following items: community surveys, Community Development Advisory Board Input, staff input, Needs Analysis, Market Analysis, efficiency and effectiveness of programs, and leverage of funds.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Accomplishment data for each Calendar Year is submitted annually in the Consolidated Annual Performance and Evaluation Report (CAPER). For the prior 2025 AAP, the overall progress will be reported in the 2025 CAPER, which will be submitted to HUD on September 28, 2026. The City has met and exceeded the majority of the goals as established in the 2020 – 2024 Consolidated Plan and will continue to report accomplishments on an annual basis again throughout the 2025 – 2029 Consolidated Plan.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

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

7. Summary

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	CINCINNATI	
CDBG Administrator	CINCINNATI	Office of the City Manager
HOPWA Administrator	CINCINNATI	Office of the City Manager
HOME Administrator	CINCINNATI	Office of the City Manager
ESG Administrator	CINCINNATI	Office of the City Manager
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative (optional)

The City of Cincinnati City Manager's Office administers the Consolidated Plan entitlement grants and oversees the individual projects. Projects are administered by city departments, including:

- City of Cincinnati Department of Buildings and Inspections
- City of Cincinnati Office of Strategic Growth,
- City of Cincinnati Department of Opportunity and Resident Services,
- Cincinnati Recreation Commission,
- Cincinnati Fire Department,

- Cincinnati Police Department,
- Cincinnati Health Department Childhood Lead Poisoning Prevention Program

The City of Cincinnati also partners with other local agencies and governmental/quasi-governmental entities to directly perform or administer programs through CDBG and HOME including the Cincinnati Metropolitan Housing Authority (CMHA), the Hamilton County Land Reutilization Authority (the "Landbank"), and the Port of Greater Cincinnati Development Authority (the "Port"). Formed jointly by the City of Cincinnati and Hamilton County, the Landbank and Port are quasi-governmental entities with unique powers and duties under Ohio Revised Code ("ORC") Chapter 4582, and ORC 1724 and 1702, respectively. Due to the unique authorities provided to the Port/Landbank, the City often requires these organizations to actively address real property matters on behalf of the City for completion of certain projects. Strategies to End Homelessness (STEh) is also engaged by the City to facilitate the administration, implementation, and monitoring of the Emergency Solutions Grant and Housing Opportunities for Persons With HIV/AIDS programs.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Cincinnati worked with a wide array of organizations and existing networks to develop the 2025 – 2029 Consolidated Plan and 2026 Annual Action Plan. Each year, relationships are maintained and fostered with these organizations to establish the Annual Action Plans and to coordinate services.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

- The local Continuum of Care collaborative applicant, Strategies to End Homelessness (STEh), coordinates the efforts of prevention and homeless services for ESG programs and coordinates groups that serve the HIV/AIDS population with HOPWA funding.
- The City partners with its Community Development Advisory Board (CDAB) to enhance coordination of the Annual Action Plans and citizen participation. This volunteer citizen group provides Consolidated Plan group priority programs for funding determined by the City Manager and the members represent the following sectors: community councils, human services agencies, organized labor, low-income advocates, small business, corporate entities, lenders, developers, real estate, Community Development Corporations (CDCs), and City Administration.
- The City works with directly with local non-profit organizations to award human services funds.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

As required by HUD, the Cincinnati/Hamilton County Continuum of Care (CoC) (OH-500) has a CoC Board that oversees all CoC operations and policies, and this board’s membership includes representatives from both the City of Cincinnati and Hamilton County. The CoC Board has selected Strategies to End Homelessness, Inc. (STEh) to serve as the CoC Lead Agency and Unified Funding Agent (UFA). In addition to STEh’s contractual relationships with HUD, STEh is under contract with the City of Cincinnati to administer ESG, HOPWA and CoC funds, and to facilitate the work of the community related to homelessness. This work includes the following program types:

- Shelter Diversion/Homelessness Prevention
- Street Outreach

- Emergency Shelter
- Transitional housing
- Rapid Resolution
- Joint Transitional Housing/Rapid Rehousing
- Permanent Housing, including Rapid Re-housing Permanent supportive housing
- Services-only programs, including the Homeless Management Information System and Coordinated Access Systems

The local Continuum of Care funding allocation process involves all agencies and programs who receive funding from the U.S. Department of Housing and Urban Development, and organizations that work with persons experiencing homelessness not receiving CoC or HUD funding. The CoC also does the following:

- Assesses capacity and identifies gaps
- Evaluates outcomes achieved by funded programs, in comparison to both local and national benchmarks
- Proactively develops improvements and solutions to systemic issues
- Stays apprised of and implements HUD priorities
- Facilitates the allocation of funding to service and housing agencies
- Researches best practices and federal priorities and facilitates the annual training series to align with programming
- Facilitates access to mainstream resources and services for persons experiencing homelessness
- Works to develop policies and procedures to address the compliance, efficiency, and effectiveness of the homelessness service system.

CoC infrastructure includes a various work groups that bring together service providers that are working to address particular issues faced by people experiencing homelessness or working to improve services available to particular sub-populations. Among these work groups are the following:

- The Family Housing Partnership, targeting the needs of homeless families
- The Homeless Veterans work group, targeting the needs of homeless veterans
- The Youth Homelessness work group, targeting the needs of homeless youth
- The Housing work group, targeting the needs of newly housed individuals and families.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Cincinnati, as the local ESG recipient, determines the exact allocation of ESG funding across eligible components, such as Street Outreach, Homelessness Prevention, and Emergency Shelter, in compliance with HUD requirements. For Emergency Shelter funding, the City of Cincinnati, in consultation with the CoC Board, adopted the "Prince of Peace" process, which is facilitated annually by STEH (Strategies to End Homelessness). This process uses Homeless Management Information System (HMIS) data to assess shelter performance and bed utilization. Performance measures, developed collaboratively between the ESG recipients, subrecipients, and the CoC, are used to allocate funds. Higher-performing shelter projects receive a greater share of funding based on their bed nights and performance metrics. STEH presents this HMIS-driven allocation to shelter operators, who meet with City of Cincinnati and STEH staff to review the data for accuracy and ensure alignment with the agreed performance measures. After this review, the final allocation is submitted to both the City and County for approval, ensuring consistency with the Consolidated Plan. Once approved, the allocation is incorporated into the respective budget and Action Plan. For Street Outreach funding, the City of Cincinnati consults closely with local stakeholders and the CoC to assess the service needs of individuals experiencing unsheltered homelessness. Funding is allocated to support activities that address these needs, ensuring effective outreach and engagement with unsheltered populations. Once the allocations for Emergency Shelter and Street Outreach are finalized, the City of Cincinnati conducts a comprehensive review of the capacity and needs for Rapid Rehousing and Homelessness Prevention.

This review helps to identify service gaps, and funding is allocated to address the areas with the greatest need, prioritizing interventions that will have the most significant impact on reducing homelessness in the jurisdiction. Strategies to End Homelessness (STEH) administers the HMIS on behalf of the CoC. Policies and procedures for HMIS are developed first and foremost by adhering to federal requirements. In instances where there is flexibility for local decision-making, STEH consults with all HMIS contributing agencies to draft these policies and procedures. Relevant workgroups are provided the opportunity to review draft policies and provide feedback. Once final recommendations are agreed upon, the policies and procedures are submitted to the CoC Board, known as the Homeless Clearinghouse, for final review and approval. Both the City of Cincinnati and Hamilton County are voting members of the Homeless Clearinghouse, ensuring collaboration and local oversight in the approval process.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Community Development Advisory Board
	Agency/Group/Organization Type	Housing PHA Services-Persons with HIV/AIDS Services-homeless Other government - Local Business Leaders Civic Leaders Neighborhood Organization Private Sector Banking / Financing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Development Advisory Board (CDAB) is a group of citizens appointed by the Mayor with Cincinnati Council approval to provide the City with feedback and recommendation on the CDBG and HOME programs. Specifically, the CDAB provides guidance to the City regarding allocation of resources to the programs as part of the Annual Action Plan and throughout the year. In making appointments to the CDAB, the City attempts to attract a broad base of representatives from banking, real estate, housing, economic development, social services providers, and citizens at large.
2	Agency/Group/Organization	Cincinnati Hamilton County Continuum of Care
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - County Other government - Local Business Leaders

What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	

Identify any Agency Types not consulted and provide rationale for not consulting

The City of Cincinnati consults a variety of agencies in the Consolidated Plan and Annual Action Plan process and no relevant agency is excluded

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Strategies to End Homelessness	
2025 Resident Survey	City of Cincinnati	These goals established community needs and provided statistically-significant resident feedback regarding effectiveness of City services/programs, and drive prioritization and decision-making of investment and resources

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

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AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The City of Cincinnati's overall citizen participation policy for the HUD entitlement grant programs include: at minimum two citizen participation events annually, at minimum two Community Development Advisory Board (CDAB) meetings to discuss yearly allocations and performance reports, City Bulletin posting of each meeting, and web site postings of Consolidated Plan, Annual Action Plans, Consolidated Annual Performance and Evaluation Reports, and public and CDAB events. Meeting invites are distributed to community groups, subrecipients, and stake holders.

The City's advisory board for the Consolidated Plan / Annual Action Plan process, the Community Development Advisory Board (CDAB), held a public hearing on 9/23/2025 to discuss: the 2024 Program Year performance and CAPER submission and the 2026 Program Year Annual Action Plan. Another public hearing was held on 2/18/2026 to discuss the upcoming 2026 Program Year, 2nd NRSA Strategy. CDAB members submitted rankings and feedback for proposed goals and activities.

The CDAB consists of a 17-member volunteer group appointed by the Mayor with City Council approval consisting of 13 community leaders and 4 City representatives. The following is the community leader composition of the CDAB according to Cincinnati Municipal Code: community council members (3), lending institutions (1), small business advocate (1), human services (1), trades / labor representation (1), low income advocate (1), housing authority (1), real estate community (1), developer (1), corporate community (1), community development corporation representative (1), and City of Cincinnati staff representation (4).

The City of Cincinnati contracted with ETC Institute to develop and distribute a community survey focused on quality of life and community needs. 1,235 residents completed the survey and data gathered informed the development of the Consolidated Plan and Annual Action Plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Public Hearing	Public Hearing:2.18.2026 CDAB Members and City of Cincinnati Staff	The Community Development Advisory Board (CDAB) ranked all programs by ranking the needs addressed.	All programs were discussed and prioritized	
2	Public Hearing	Public Hearing	Public Hearing:9.23.25 CDAB Members and City of Cincinnati Staff	The Community Development Advisory Board (CDAB) discussed all programs and 2024 Program Year performance	All programs were discussed and prior program year performance was reviewed.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Cincinnati was awarded the following entitlement allocations from the U.S. Department of Housing and Urban Development (HUD) for the City's 2025 HUD Program Year period of July 1, 2026 – June 30, 2027: \$10,925,956 in Community Development Block Grant (CDBG) funds; \$2,596,978.03 in HOME Investment Partnerships Program (HOME) funds; \$972,328 in Emergency Solutions Grant (ESG) funds; and \$2,043,145 in Housing Opportunities for People with HIV/AIDS (HOPWA) funds. In addition, the City has \$1,057,209.89 in CDBG Program Income and \$69,060.00 in HOME Program Income available for programming to eligible activities. The PY 2026 Action Plan budgets for each program are calculated based on the entitlement award plus available program income. For CDBG, HOME, ESG, and HOPWA, the maximum caps are employed.

Note: The Prior Year Resources amounts included in the following table represent program funds that were previously awarded to eligible

activities that are still ongoing.

Actual 2026 Annual Allocation Amounts:

CDBG: \$10,925,956

HOME: \$2,596,978.03

HOPWA: \$2,043,145

ESG: \$972,328

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	10,925,956.00	1,057,209.00	9,730,570.00	21,713,735.00	44,252,328.00	Acquisition Administration Economic Development Housing Public Improvements Public Services

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	2,596,978.03	69,060.00	8,838,181.00	11,504,219.03	10,287,079.00	Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownershipAdministration

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	2,043,145.00	0.00	1,552,341.00	3,595,486.00	7,649,040.00	Permanent housing in facilities Permanent housing placement STRMU Short term or transitional housing facilities Supportive services TBRA

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	972,328.00	0.00	848,560.00	1,820,888.00	3,927,728.00	Street Outreach Conversion and rehab for shelter Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG funds are used to leverage other public and private funds. The programs which leverage funds are the Neighborhood Business District Improvement Program (NBDIP); Strategic Housing Initiatives Program; Operating Support for Community Development Corporations (CDCs); Small Business Services; Commercial and Industrial Redevelopment; Historic Stabilization of Structures; Green Urban Watershed Restoration;

Findlay Market Operating Support; and Vacant Lot Reutilization. Construction projects are funded as gap financing and are not the only source of funding for these projects.

HOME funds are also utilized to leverage other public and private funds, and generate matching funds as required by HUD. These programs include: Single Family Homeownership Development; Strategic Housing Initiatives Program; Operating Support for Community Development Housing Organizations (CHDOs); CHDO Development Projects; and the Down Payment Assistance Initiative Program. All eligible projects receive the City's Community Reinvestment Area Residential or Commercial Tax Abatement upon City Council authorization. The City of Cincinnati offers a residential and commercial tax abatement program for new properties and renovations. The abatement allows the owners to pay property taxes primarily on the pre-improvement value. The abatement can last 10 to 15 years, depending on the type of project. The savings from the tax abatement is utilized as the City's HOME local match requirement.

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

The City of Cincinnati owns vacant buildings and vacant lots in most of its fifty-two neighborhoods. Programs in the 2025– 2029 Consolidated Plan to address the use of publicly owned land – Strategic Housing Initiatives Program and the Vacant Lot Reutilization Program. The City has compiled an inventory on the City owned parcels and properties. The available properties are posted on the City’s website, www.choosecincy.com, with an interactive map and property descriptions. Redevelopment projects will be selected using a competitive process under a Notice Of Funding Availability application and through partnerships with quasi-governmental organizations.

Discussion

The City of Cincinnati operates a program titled Cincinnati Land Reutilization Program (CLRP) to address non-productive publicly owned land or property. The purpose of the CLRP is to return the non-productive property into productive uses, including homeownership, multi-income housing development, commercial and industrial redevelopment, parks and recreation, institutional or public use, infrastructure, community gardens, urban agriculture, and side-lot, vacant lot purchase. This program utilizes City funds and these properties may be eligible for federally funded redevelopment.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Thriving Neighborhoods: Housing & Building Quality	2020	2024	Affordable Housing	City-wide	Affordable Housing	CDBG: \$283,000.00 HOME: \$2,627,537.53	Rental units constructed: 30 Household Housing Unit Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Added: 3 Household Housing Unit Homeowner Housing Rehabilitated: 1115 Household Housing Unit Direct Financial Assistance to Homebuyers: 20 Households Assisted Other: 1 Other
2	Neighborhood Improvements & Public Safety	2020	2024	Non-Housing Community Development	City-wide	Non-housing Community Development	CDBG: \$8,620,298.43	Public service activities other than Low/Moderate Income Housing Benefit: 2817 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Growing Economic Opportunity	2020	2024	Non-Housing Community Development	City-wide	Non-housing Community Development	CDBG: \$197,677.60 HOME: \$140,848.00	Facade treatment/business building rehabilitation: 10 Business Brownfield acres remediated: 2 Acre Businesses assisted: 52 Businesses Assisted
4	Homeless Services	2020	2024	Homeless	City-wide	Homelessness	ESG: \$937,595.00	Tenant-based rental assistance / Rapid Rehousing: 40 Households Assisted Homeless Person Overnight Shelter: 4000 Persons Assisted Homelessness Prevention: 20 Persons Assisted
5	Special Needs	2020	2024	Non-Homeless Special Needs	City-wide	Non-Homeless Special Needs	HOPWA: \$1,912,260.00	Housing for People with HIV/AIDS added: 225 Household Housing Unit HIV/AIDS Housing Operations: 25 Household Housing Unit

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Thriving Neighborhoods: Housing & Building Quality
	Goal Description	Housing Repair Services, HARBOR, Strategic Housing Initiatives Program, CHDO Development Projects, American Dream Down Payment Initiative Program, and other Affordable Housing Programs
2	Goal Name	Neighborhood Improvements & Public Safety
	Goal Description	Neighborhood Improvements and Public Safety Collaborations Programs: Lead Hazard Testing, Youth and Young Adult Employment; Place-Based Initiatives Program; Emergency Mortgage Assistance and Tenant Representation; and other Neighborhood Improvements and Public Safety Collaborations.
3	Goal Name	Growing Economic Opportunity
	Goal Description	Economic Development and Workforce Development Programs: Operating Support to CDCs; Empower Neighborhoods-- project support to CDCs; Hand Up Initiative; Fair Housing Services; Strategic Housing Initiatives Program (SHIP); Findlay Market Operating Support; Commercial and Industrial; and other programs.
4	Goal Name	Homeless Services
	Goal Description	Emergency Solutions Grant Components: Emergency Shelters, Street Outreach, Rapid Re-housing, Homelessness Prevention, and other ESG activities
5	Goal Name	Special Needs
	Goal Description	Housing Opportunities for Person With HIV/AIDS Services and Support

Projects

AP-35 Projects – 91.220(d)

Introduction

Any changes to the Annual Action Plan will be made through a substantial amendment to the Consolidated Plan. A substantial amendment to the Consolidated Plan requires public notice with a 30-day opportunity to comment, including notice to the Community Development Advisory Board (CDAB), recommendation from the City Manager and approval from City Council through an Authorizing Ordinance. For substantial amendments, a public hearing before the City Council may be held, if necessary. Following this process involving the City Manager, the public, the CDAB, and City Council, the request is submitted to HUD for review and approval.

Projects may be carried out by the City or quasi-governmental entity partners, including: Cincinnati Development Fund, the Port Authority, Homebase, and the Cincinnati Metropolitan Housing Authority.

Given the limited nature of resources, the City prioritizes the needs identified through the Consolidated Planning process to direct the allocation of funds in a manner that maximizes community impact. Through the City's budgeting process the following projects were funded to implement the Strategic Plan Goals.

A substantial amendment is defined to include the following situations: the addition or removal of projects from the Consolidated Plan. However, creation of a new project addressing an Urgent Need national objective shall not be considered a substantial amendment.

Projects

#	Project Name
1	Thriving Neighborhoods: Housing and Building Quality Programs '26
2	Growing Economic Opportunity: Economic Development & Workforce Development Programs '26
3	Neighborhood Improvements and Public Safety Collaborations '26
4	Section 108 Loan Debt Service '26

#	Project Name
5	Administration '26
6	American Dream Down Payment Initiative '26
7	CHDO Development Projects '26
8	Operating Support for Community Housing Development Organizations (CHDOs) '26
9	Strategic Housing Initiatives Program (SHIP) HOME '26
10	Emergency Solutions Grant '26
11	HOPWA Services and Support '26

Table 7 - Project Information

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

The City allocated resources based upon community needs, the success of a program at addressing those needs, input from citizens through the Community Development Advisory Board (CDAB) and the public hearing process. The CDAB is a volunteer citizen group appointed by the Mayor and approved by City Council. The CDAB advises the City Manager on the Consolidated Plan, Annual Action Plans, related resource allocations, and other matters related to the administration of the Consolidated Plan. The major obstacle in addressing the City of Cincinnati needs is a lack of funding. The CDAB, the public, and City staff ranked each project in the CDBG and HOME grant program. All projects that were recommended were approved for funding in CY 2026.

Any changes to the Annual Action Plan will be made through a substantial amendment to the Consolidated Plan. A substantial amendment to the Consolidated Plan requires public notice with a 30-day opportunity to comment, including notice to the Cincinnati Community Development Advisory Board (CDAB), recommendation from the City Manager and approval from City Council through an Authorizing Ordinance. For substantial amendments, a public hearing before the City Council may be held, if necessary. Following this process involving the City Manager, the public, the CDAB, and City Council, the request is submitted to HUD for review and approval.

A substantial amendment is defined to include the following situations: the addition or removal of programs from the Consolidated Plan. However, creation of a new program addressing an Urgent Need national objective shall not be considered a substantial amendment.

Given the limited nature of resources, the City prioritizes the needs identified through the Consolidated Planning process to direct the allocation of funds in a manner that maximizes community

impact. Through the City's budgeting process the projects were funded to implement the identified Strategic Plan Goals.

Generally, HOME, ESG and HOPWA funds will continue to fund the same programs as in previous years. CDBG funding has changed significantly from the 2020-2024 Consolidated Plan period; changes were made to address the priority needs identified to ensure timely expenditure of funds.

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AP-38 Project Summary
Project Summary Information

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1	Project Name	Thriving Neighborhoods: Housing and Building Quality Programs '26
	Target Area	City-wide
	Goals Supported	Thriving Neighborhoods: Housing & Building Quality
	Needs Addressed	Affordable Housing
	Funding	:
	Description	Housing and Building Quality Programs: Family Rehousing Assistance, Concentrated Code Enforcement, Housing Repair Services, HARBOR, Hazard Abatement and Stabilization, and other Housing and Building Quality Programs.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	20 persons assisted with homelessness prevention; 4000 households receiving code enforcement inspections and referrals for services; 1115 homeowner households rehabilitated; 165 buildings demolished
	Location Description	
2	Planned Activities	Housing and Building Quality Programs: Family Rehousing Assistance, Concentrated Code Enforcement, Housing Repair Services, HARBOR, Hazard Abatement and Stabilization, and other Housing and Building Quality programs.
	Project Name	Growing Economic Opportunity: Economic Development & Workforce Development Programs '26

	Target Area	City-wide Beekman Corridor NRSA Bond Hill NRSA Camp Washington NRSA East End NRSA Evanston - Walnut Hills NRSA Kennedy Heights NRSA Linwood NRSA Madisonville NRSA Mount Airy NRSA Over-the-Rhine - West End NRSA Pendleton NRSA Price Hill - NRSA Riverside - Sedamsville NRSA Roselawn NRSA Upper Mill Creek NRSA Uptown NRSA Westwood NRSA
	Goals Supported	Growing Economic Opportunity
	Needs Addressed	Non-housing Community Development
	Funding	:
	Description	Economic Development and Workforce Development Programs: Operating Support to CDCs; Empower Neighborhoods--project support to CDCs; Hand Up Initiative; Fair Housing Services; Strategic Housing Initiatives Program (SHIP); and other programs.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	1500 Public service activities other than Low/Moderate Income Housing Benefit; 10 rental units rehabilitated; 13 businesses assisted
	Location Description	
	Planned Activities	Economic Development and Workforce Development Programs: Operating Support to CDCs; Empower Neighborhoods--project support to CDCs; Hand Up Initiative; Fair Housing Services; Strategic Housing Initiatives Program (SHIP); and other programs.
	Project Name	Neighborhood Improvements and Public Safety Collaborations '26

3	Target Area	City-wide
	Goals Supported	Neighborhood Improvements & Public Safety
	Needs Addressed	Non-housing Community Development
	Funding	:
	Description	Neighborhood Improvements and Public Safety Collaborations Programs: Lead Hazard Testing, Youth and Young Adult Employment; Place-Based Initiatives Program; Emergency Mortgage Assistance and Tenant Representation; and other Neighborhood Improvements and Public Safety Collaborations.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	600 persons to be assisted: 100 receiving emergency mortgage assistance and 500 receiving tenant representation assistance; 750 households receiving Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit and 3 buildings receiving Housing Code Enforcement/Foreclosed Property Care; 120 housing code enforcements; 250 persons
	Location Description	
	Planned Activities	Neighborhood Improvements and Public Safety Collaborations Programs: Lead Hazard Testing, Youth and Young Adult Employment; Place-Based Initiatives Program; Emergency Mortgage Assistance and Tenant Representation; and other Neighborhood Improvements and Public Safety Collaborations.
4	Project Name	Section 108 Loan Debt Service '26
	Target Area	City-wide
	Goals Supported	Thriving Neighborhoods: Housing & Building Quality
	Needs Addressed	Affordable Housing
	Funding	:
	Description	This covers debt service on existing CDBG Section 108 loans and for eligible expenses supporting Section 108 loan applicants.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	N/A

	Location Description	N/A
	Planned Activities	This covers debt service on existing CDBG Section 108 loans and for eligible expenses supporting Section 108 loan applicants.
5	Project Name	Administration '26
	Target Area	City-wide
	Goals Supported	Thriving Neighborhoods: Housing & Building Quality
	Needs Addressed	Affordable Housing
	Funding	:
	Description	20% annual CDBG entitlement allocation; 10% annual HOME entitlement allocation; Note: ESG Admin is included with ESG '25 Project and HOPWA Admin is included with HOPWA '25 Project.7.5% annual ESG entitlement allocation; 3% annual HOPWA entitlement allocation.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
6	Planned Activities	20% annual CDBG entitlement allocation; 10% annual HOME entitlement allocation; Note: ESG Admin is included with ESG '25 Project and HOPWA Admin is included with HOPWA '25 Project.7.5% annual ESG entitlement allocation; 3% annual HOPWA entitlement allocation.
	Project Name	American Dream Down Payment Initiative '26
	Target Area	City-wide
	Goals Supported	Thriving Neighborhoods: Housing & Building Quality
	Needs Addressed	Affordable Housing
	Funding	:

	Description	The American Dream Down payment Initiative (ADDI) program funds down payment assistance for the purchase of single-family owneroccupied housing by first-time, eligible low to moderate incomehomebuyers or eligible homebuyers that have not owned property in the last three years. ADDI funds are awarded as a five-year non-interestbearing deferred loan payment with a five-year residency requirement. All or a portion of the funds will be recaptured in the event a homeowner moves from the residence, sells or transfers ownership during the fiveyear residency period. All ADDI recipients are required to take a HUDapproved homebuyer counseling course in advance of receiving this assistance.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	20 homebuyers
	Location Description	
	Planned Activities	The American Dream Down payment Initiative (ADDI) program funds down payment assistance for the purchase of single-family owneroccupied housing by first-time, eligible low to moderate income homebuyers or eligible homebuyers that have not owned property in the last three years. ADDI funds are awarded as a five-year non-interestbearing deferred loan payment with a five-year residency requirement. All or a portion of the funds will be recaptured in the event a homeowner moves from the residence, sells or transfers ownership during the fiveyear residency period. All ADDI recipients are required to take a HUDapproved homebuyer counseling course in advance of receiving this assistance.
7	Project Name	CHDO Development Projects '26
	Target Area	City-wide
	Goals Supported	Thriving Neighborhoods: Housing & Building Quality
	Needs Addressed	Affordable Housing
	Funding	:

	Description	HUD requires that at least 15% of the federal HOME allocation be used in development projects in partnership with Community Housing Development Organizations (CHDOs). These funds will be used for both rental and homeowner projects, new construction and renovations, with certified CHDOs. CHDOs are required to re-certify their designation biannually.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	8 rental units constructed
	Location Description	
	Planned Activities	HUD requires that at least 15% of the federal HOME allocation be used in development projects in partnership with Community Housing Development Organizations (CHDOs). These funds will be used for both rental and homeowner projects, new construction and renovations, with certified CHDOs. CHDOs are required to re-certify their designation biannually.
8	Project Name	Operating Support for Community Housing Development Organizations (CHDOs) '26
	Target Area	City-wide
	Goals Supported	Thriving Neighborhoods: Housing & Building Quality
	Needs Addressed	Affordable Housing
	Funding	:
	Description	HUD allows that up to 5% of the federal HOME allocation may be used in operating support for Community Housing Development Organizations (CHDOs). These funds may be used to cover staff time, rent charges, and any other operating costs of the certified CHDOs. Goal for this project are tied to CHDO Development Projects.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	N/A

	Location Description	
	Planned Activities	HUD allows that up to 5% of the federal HOME allocation may be used in operating support for Community Housing Development Organizations (CHDOs). These funds may be used to cover staff time, rent charges, and any other operating costs of the certified CHDOs. Goal for this project are tied to CHDO Development Projects
9	Project Name	Strategic Housing Initiatives Program (SHIP) HOME '26
	Target Area	City-wide
	Goals Supported	Thriving Neighborhoods: Housing & Building Quality
	Needs Addressed	Affordable Housing
	Funding	:
	Description	SHIP provides gap financing for construction and renovation of multifamily units and single-family development, and permanent supportive housing. Strategic Housing Initiatives Program is an opportunity for the City to spur transformative housing development by leveraging resources to revitalize City neighborhoods, creating long-term livability benefits. Projects may be carried out by the City or other quasi-governmental entities, including: Cincinnati Development Fund, the Port Authority, Homebase, and the Cincinnati Metropolitan Housing Authority.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	20 rental units constructed
	Location Description	
	Planned Activities	SHIP provides gap financing for construction and renovation of multifamily units and single-family development, and permanent supportive housing. Strategic Housing Initiatives Program is an opportunity for the City to spur transformative housing development by leveraging resources to revitalize City neighborhoods, creating long-term livability benefits. Projects may be carried out by the City or other quasi-governmental entities, including: Cincinnati Development Fund, the Port Authority, Homebase, and the Cincinnati Metropolitan Housing Authority.

10	Project Name	Emergency Solutions Grant '26
	Target Area	City-wide
	Goals Supported	Homeless Services
	Needs Addressed	Homelessness
	Funding	:
	Description	ESG funds the operation of emergency shelter facilities as well as essential services for the residences. A current maximum of 60% the annual ESG entitlement allocation may be utilized for Emergency Shelter and Street Outreach activities. ESG Rapid Re-Housing activities will provide Housing Relocation and Stabilization Services and short and medium-term Tenant Based Rental Assistance (TBRA). A total of \$589,159 will be used for Emergency Shelter and Street Outreach; \$319,129.00 will be used for Rapid-Rehousing activities and Admin is \$73,644. Admin is limited to 7.5% of annual ESG entitlement allocation.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	4000 individuals and 40 households
	Location Description	
11	Planned Activities	ESG funds the operation of emergency shelter facilities as well as essential services for the residences. A current maximum of 60% the annual ESG entitlement allocation may be utilized for Emergency Shelter and Street Outreach activities. ESG Rapid Re-Housing activities will provide Housing Relocation and Stabilization Services and short and medium-term Tenant Based Rental Assistance (TBRA). A total of \$589,159 will be used for Emergency Shelter and Street Outreach; \$319,129.00 will be used for Rapid-Rehousing activities and Admin is \$73,644. Admin is limited to 7.5% of annual ESG entitlement allocation
	Project Name	HOPWA Services and Support '26
	Target Area	City-wide
	Goals Supported	Special Needs
	Needs Addressed	Non-Homeless Special Needs
	Funding	:

	Description	HOPWA funds will provide housing assistance through Short-Term Rent, Mortgage, and Utility Assistance (STRMU), Tenant Based Rental Assistance (TBRA), and permanent housing placement. HOPWA-funded TBRA services to individuals with HIV/AIDS that require assistance with rent or mortgage expenses. HOPWA funds will also be used to support the operation of Caracoles two transitional living facilities persons displaced by HIV/AIDS. Costs will include utilities, phone, insurance, regular maintenance, supplies and residential operating staff. In addition, HOPWA funding will be used to support the cost of nursing and personal care, case management, and meals for HIV/AIDS clients. Services are provided by three sponsor agencies, Center for Respite Care, Northern Kentucky Health Independent District, and Caracole.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	200 households assisted
	Location Description	Cincinnati EMSA
	Planned Activities	HOPWA funds will provide housing assistance through Short-Term Rent, Mortgage, and Utility Assistance (STRMU), Tenant Based Rental Assistance (TBRA), and permanent housing placement. HOPWA-funded TBRA services to individuals with HIV/AIDS that require assistance with rent or mortgage expenses. HOPWA funds will also be used to support the operation of Caracoles two transitional living facilities persons displaced by HIV/AIDS. Costs will include utilities, phone, insurance, regular maintenance, supplies and residential operating staff. In addition, HOPWA funding will be used to support the cost of nursing and personal care, case management, and meals for HIV/AIDS clients. Services are provided by three sponsor agencies, Center for Respite Care, Northern Kentucky Health Independent District, and Caracole.

AP-50 Geographic Distribution – 91.220(f)

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

There are two types of neighborhood boundaries that presently exist in the City of Cincinnati: (1) The 52 Neighborhood Boundaries drawn by neighborhood community councils and reflected in the Community Councils' by-laws and (2) The 51 Statistical Neighborhoods Areas (SNAs) which are delineated by census tracts.

Generally, CDBG, HOME and ESG programs serve the entire City of Cincinnati in accordance with the program requirements of each grant. The HOPWA program serves the Cincinnati Eligible Metropolitan Statistical Area (EMSA), which covers fifteen counties in the area.

Geographic Distribution

Target Area	Percentage of Funds
City-wide	75

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

HOPWA funding is allocated within the EMSA, and among HOPWA service providers, by the HOPWA Advisory Committee. This committee, comprised of the HOPWA recipient agencies, Strategies to End Homelessness, City of Cincinnati, and other key HIV treatment stakeholders, looks at data pertaining to services provided, number of people and households served, as well as HIV prevalence data, and allocates available HOPWA funds according to needs within the community.

The HOPWA program serves the Cincinnati Eligible Metropolitan Statistical Area (EMSA), which covers 5 Ohio counties (Brown, Butler, Clermont, Hamilton, Warren); 7 Kentucky counties (Boone, Bracken, Campbell, Gallatin, Grant, Kenton, Pendleton); and 3 Indiana Counties (Dearborn, Franklin, Ohio). Although the four agencies that currently receive HOPWA funding are located in the Greater Cincinnati area, collectively they offer HOPWA assistance to persons in any of the 15 counties included in the EMSA. The HOPWA Advisory Committee makes funding recommendations to the City of Cincinnati based on the needs of the population and the market to ensure that each geographic area is

receiving funding commensurate with need.

Discussion

There are two types of neighborhood boundaries that presently exist in the City of Cincinnati: (1) The 52 Neighborhood Boundaries drawn by neighborhood community councils and reflected in the Community Councils' by-laws and (2) the 51 Statistical Neighborhoods Areas (SNAs) which are delineated by census tracts.

There are two types of neighborhood boundaries that presently exist in the City of Cincinnati: (1) The 52 Neighborhood Boundaries drawn by neighborhood community councils and reflected in the Community Councils' by-laws and (2) the 51 Statistical Neighborhoods Areas (SNAs) which are delineated by census tracts. Generally, CDBG, HOME and ESG programs serve the entire City of Cincinnati in accordance with the program requirements of each grant. The HOPWA program serves the Cincinnati Eligible Metropolitan Statistical Area (EMSA), which covers fifteen counties in the area. For the CDBG program, the City of Cincinnati has submitted and has received HUD approval amended Neighborhood Reinvestment Strategy Areas (NRSA) with a new term. An NRSA is a geographical area within a neighborhood that is primarily residential and contains 70% or more of low- and moderate income residents. NRSA designations assists with targeting CDBG resources in support of community revitalization efforts. The residential portions of the following neighborhoods have been approved for NRSA eligibility are: Avondale; Bond Hill; Camp Washington; Carthage; Corryville; CUF; East End; East Price Hill; East Westwood; English Woods; Evanston; Kennedy Heights; Linwood; Lower Price Hill; Madisonville; Millvale; Mount Airy; Mount Auburn; North Fairmount; Northside; Over-the-Rhine; Pendleton; Riverside; Roselawn; Sedamsville; South Cumminsville; South Fairmount; Spring Grove Village; Villages at Roll Hill; Walnut Hills; West End; West Price Hill; Westwood; and Winton Hills.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	60
Non-Homeless	175
Special-Needs	0
Total	235

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	159
The Production of New Units	20
Rehab of Existing Units	1,125
Acquisition of Existing Units	0
Total	1,304

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The City of Cincinnati has developed these goals in the 2026 Annual Action Plan based on actual outcomes from the 2020 – 2024 Consolidated Plan, the needs analysis, community surveys, and market analysis. The goals listed are conservative to account for any unforeseen issues with the programs. The City anticipates exceeding all goals listed.

AP-60 Public Housing – 91.220(h)

Introduction

The Cincinnati Metropolitan Housing Authority (CMHA) is one of the largest public housing agencies in the United States. CMHA's service area includes the City of Cincinnati as well as all of Hamilton County.

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

The Cincinnati Metropolitan Housing Authority (CMHA) has the ability to assist nearly 11,663 families through administration of the Housing Choice Voucher (HCV) Program. CMHA also owns and manages a portfolio of approximately 5,126 public housing units with a budget of approximately \$134.89 million, which includes the operating, capital, annual contributions for Section 8 Tenant-Based Assistance, family self-sufficiency, as well as rental income.

The Cincinnati Metropolitan Housing Authority (CMHA) currently has approximately 3% of its Vouchers invested in Project-Based Vouchers throughout Hamilton County. The goal over the next 5 years is to increase that number up to 20%. CMHA will use the conversion of Housing Choice Vouchers to Project-Based Vouchers to meet the housing needs of special-needs populations through financially supporting the collaboration of private and non-profit partnerships that result in specific and comprehensive housing and service provisions.

The additional Project-Based Vouchers (PBV) will provide avenues for partnership with the City of Cincinnati and Hamilton County to support the preservation of vital housing communities that are pivotal to the local jurisdictional area and/or the submarket of the community's locality. Further, this transition to PBV's could have a decidedly positive impact on the de-concentration of very, very low-income housing (incomes less than 30% of AMI) in Hamilton County. Such households comprise more than half of housing units in seven City of Cincinnati neighborhoods. The expansion of Project-Based Vouchers will continue to promote the expansion of quality affordable housing opportunities for low and moderate-income families.

CMHA will continue to develop affordable units over the next several years, consistent with: CHMA's strategic goal of developing affordable housing units, cooperation agreements with Hamilton County and the City of Cincinnati, CMHA's long term viability assessment of public housing units, and CMHA's strategic plan and the Voluntary Compliance Agreement between CMHA and HUD. In development of the units, CMHA will adhere to the following principles: assessment of quality and condition of units for replacement with new construction to meet housing needs; provision of marketable amenities and encouragement of neighborhood amenities; provision of choice and opportunity; leveraging of resources, tying into community planning and partnerships where possible; provision of comprehensive plan and solution for community / site revitalization which includes people, housing, and neighborhoods

and partners where possible; provision of housing opportunities and choice for income tiers of 0 – 120% AMI for seniors, families, and other populations; and creation of synergistic economic development.

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

The City's HOME-funded American Dream Down-payment Initiative Program is available to all income-qualified residents, including public housing residents, to encourage homeownership. The City participates at CMHA's Annual Home Ownership Fair, which is designed to connect tenants to lenders, agents, home ownership professionals and to educate the tenants regarding down payment assistance programs and utilizing Housing Choice Vouchers to purchase a home.

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

The Cincinnati Metropolitan Housing Authority (CMHA) is designated as a troubled PHA. Progress is being made toward having the designation lifted.

Discussion

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

Introduction

Expand homelessness prevention/shelter diversion services to be in alignment with community need:

- Expand Shelter Diversion services, including through connection to Prevention, Retention, Contingency (PRC) funds available through the Hamilton County Dept. of Job and Family Services; and
- Expand Eviction Prevention services, in alignment with efforts led by the City of Cincinnati and Hamilton County, and also through connection to Prevention, Retention, Contingency (PRC) funds available through the Hamilton County Department of Job and Family Services.

Expand low-barrier shelter capacity:

- Identify resources that will allow the approximately 200 shelter beds previously made available as the Winter Shelter to remain available year-round, specifically targeting people experiencing homelessness who otherwise would be unsheltered;
- Identify resources that will allow family shelter to be delivered in a more efficient way, in few locations, so that resources can be focused on services to homeless families, rather than such resources being exhausted moving families and staff between numerous separate shelter locations; and
- Develop and implement a plan for offering seasonal overflow low-barrier shelter capacity for families experiencing homelessness, allowing the shelter system to expand to meet the needs of homeless families at times of peak demand, including summer.

Improve the availability of affordable housing:

- In collaboration with the local Public Housing Authority, the Cincinnati Metropolitan Housing Authority (CMHA), City of Cincinnati, and Hamilton County and others, continue to expand the available of Housing Choice Voucher program subsidies to households that were previously homeless or at risk of homelessness; and
- Build collaborations with additional property owners to reduce the length of time necessary for a household that has been matched to a supportive housing program and subsidy to find a rental unit.

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

Reaching out to homeless persons (especially unsheltered persons) and assessing their

individual needs

In 2024, the Cincinnati/Hamilton County region documented 1,823 individuals experiencing unsheltered homelessness, representing approximately 28% of the total homeless population for that year. Of this group, 12% were completely unsheltered, while approximately 16% experienced periods of alternating between shelter and unsheltered homelessness. This fluctuation highlights the instability many individuals face as they cycle in and out of housing, underscoring the need for a more tailored approach to housing and services.

The Homeless Outreach Group (HOG) plays a critical role in coordinating the city's street outreach services. This collaborative coalition of outreach providers meets monthly to share best practices, track progress, and ensure consistent engagement with individuals experiencing unsheltered homelessness. The group includes representatives from outreach programs, service providers, and law enforcement, specifically the Cincinnati Police Department, to ensure a comprehensive, multi-faceted approach to addressing homelessness in the region.

Cincinnati's street outreach services are vital for connecting unsheltered individuals with emergency shelter, case management, and essential health services. These outreach teams, coordinated through the Homeless Outreach Group (HOG), are equipped to engage individuals in encampments and other hard-to-reach locations. Outreach teams are trained to offer immediate access to services and help individuals transition out of homelessness into stable housing.

Several programs play a key role in providing street outreach to individuals experiencing unsheltered homelessness:

- Greater Cincinnati Behavioral Health (GCBH) is the largest street outreach provider in the region, offering specialized services for individuals with mental health and substance use issues. Their three outreach programs are particularly focused on
 - individuals living unsheltered in the downtown area, addressing the comprehensive needs of this population, in collaboration with the Cincinnati Center City Downtown Development Corporation (3CDC). Persons with substance abuse issues Person with mental health challenges.
 - Lighthouse Youth and Family Services is instrumental in reaching out to homeless youth, especially unaccompanied minors and young adults. Their efforts help connect youth to shelter and a range of supportive services tailored to their unique needs.
 - The Veterans Administration (VA) provides dedicated outreach services to unsheltered veterans, ensuring they receive the necessary support and resources to overcome homelessness.
1. Immediate Safety and Basic Needs: Ensuring individuals have access to basic necessities such as food, water, hygiene, and emergency shelter.

2. **Comprehensive Screening and Assessment:** Outreach workers assess each individual's physical, mental, and social needs, including health care, mental health services, substance use treatment, and trauma-informed care.
3. **Building Trust and Long-Term Engagement:** Street outreach teams focus on establishing trust and rapport, recognizing the barriers to service engagement often faced by individuals living unsheltered. Long-term engagement strategies are critical in reducing the cycles of homelessness.
4. **Coordinated Case Management:** Using data systems like HMIS, outreach teams connect individuals to available resources, ensuring that they are linked with the right services at the right time, whether it be temporary shelter, long-term housing solutions, or specialized care.

Addressing the emergency shelter and transitional housing needs of homeless persons

Cincinnati offers a network of emergency shelters designed to support individuals and families experiencing homelessness. These shelters provide safe housing, meals, and access to critical wraparound services such as case management, medical care, employment assistance, and housing

support.

Shelterhouse Programs:

Esther Marie Hatton Center for Women

- Capacity: 60 beds for women aged 18 and older

David and Rebecca Barron Center for Men

- Capacity: 150 beds, with an additional 10,000 sq. ft. winter shelter open Dec–Feb

City Gospel Mission (for Men)

- Capacity: 74 beds

Bethany House Services (for Families)

- Capacity: 43 bedrooms for families (2-3 bunk beds each)

Found House Interfaith Hospitality Network (IHN)

- Services: Overnight shelter for families through a network of congregations

Needs of the Homeless Population in Cincinnati

Cincinnati's homeless population faces a complex mix of challenges:

- Affordable Housing Crisis: One in three residents cannot afford their housing, leading to high rates of eviction and displacement.
- Rising Family Homelessness: Families are the fastest-growing segment. In 2024, only 38.2% of families seeking shelter were able to access it.
- Increase in Unsheltered Homelessness: A growing number of people live in camps, cars, or on the streets.
- Overburdened Systems: Shelters, including the Barron Center, often operate at or above capacity. Demand continues to outpace supply.
- Service Gaps: Insufficient long-term housing, mental health services, and substance abuse treatment are ongoing barriers to stability.

Transitional Housing in Cincinnati:

Transitional housing serves as a crucial bridge for individuals and families moving from homelessness to

stable, independent living. These programs offer temporary housing combined with supportive services, aiming to equip residents with the skills and resources needed for long-term self-sufficiency. In Cincinnati, several organizations provide transitional housing options tailored to diverse needs.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The following actions will be taken to improve services to people currently on the streets and in shelters, particularly the chronically homeless and homeless families:

- Maintenance of current Street Outreach capacity;
- Ongoing implementation of the *Solutions for Family Homelessness* plan;
- Ongoing implementation of the Youth Homelessness Demonstration Program *KEYS to a Future without Youth Homelessness* plan;
- Expansion of the low-barrier Winter Shelter facility into a year-round facility;
- Continued expansion of Rapid Re-Housing (RRH) and Permanent Supportive Housing resources, through the CoC Coordinated Entry system;
- Recruitment of additional property owners to provide safe, decent affordable housing units to households exiting homelessness through a supportive housing program;
- Expansion of Aftercare services in an effort to reduce recidivism; and
- Addition of efficient, flexible family shelter capacity.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The following activities are ongoing:

- Shelter Diversion, which targets households that are living in doubled-up situations, running out of such places to stay, and will soon be entering an emergency shelter or sleeping unsheltered;
- Supportive Services for Homeless Veteran Families (SSVF), which provides a range of services,

including prevention, for vulnerable veterans and veteran's families;

- Youth Aging out of Foster Care: Lighthouse Youth and Family Services targets toward preventing homelessness among youth who have been in the Foster Care system; and
- LGBTQ Youth Homelessness Prevention Initiative, begun through the HUD LGBTQ Youth Homelessness Prevention Demonstration program, and now led by Lighthouse Youth and Family Services as the *Safe and Supported* program.

Discussion

AP-70 HOPWA Goals– 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	115
Tenant-based rental assistance	60
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	175

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

Introduction:

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Discrimination against protected classes and housing affordability are two separate issues but intertwined that one requires addressing the other. The following outlines key goals in supporting barriers to fair housing issues:

- Support organizations who are actively working to provide housing choices for the broadest groups of residents;
- Establishing a City Housing Trust Fund to develop new affordable housing, improve and preserve existing housing, and provide support for low-to-moderate-income households;
- Land use regulations that require, single-family lot sizes larger than a quarter acre, that prohibit multi-family housing, that regulate housing classifications by type of occupant and definitions of a family that are likely having a disparate impact on low-income, protected classes of residents require addressing; and
- Support organizations that are promoting and protecting protected classes and providing affordable housing.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

The continued obstacle for the City of Cincinnati to appropriately address the underserved needs continues to be a lack of sufficient funding.

Actions planned to address obstacles to meeting underserved needs

The need for housing, community development, and quality of life services to assist low- and moderate-income individuals, families, and neighborhoods, is tremendous. The greatest obstacle to meeting 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, suitable living environments, and expanded economic opportunities are met for all Cincinnati residents and businesses, especially those with the most need.

The lack of permanent supportive housing and funding to provide adequate services to move persons out of homelessness remain obstacles to meeting the needs of the underserved. Permanent supportive housing projects have been a priority for funding projects since 2016.

Actions planned to foster and maintain affordable housing

The City plans to accomplish affordable housing goals and objectives through the housing projects Strategic Housing Initiatives Program, Community Housing Development Organizations Development Projects, Single Family Homeownership Development, Compliance Assistance Repairs for the Elderly, and the Housing Repair Services Program. These programs are the primary way the City strives to foster and maintain decent affordable housing during the next year.

Actions planned to reduce lead-based paint hazards

The City of Cincinnati administers a lead-based paint abatement grant program from HUD's Office of Lead Hazard Control and Healthy Homes – administered by the Cincinnati Health Department Childhood Lead Poisoning Prevention Program (CHD CLPPP). Since 2007, HUD has awarded the City \$19.4 million to address lead-based paint hazards in more than 1,200 qualified units, including single and multifamily buildings, with a focus on lead poisoning prevention in children under the age of six. The grants average

approximately \$9,000 per home, which is comparable to the average cost laid out by the U.S. Environmental Protection Agency. Replacing windows is often the most expensive part of these renovations. The remainder of the grant covers administrative and educational costs, and the costs of training contractors for licensed lead clean-up efforts.

CDBG funding allocated to CHD CLPPP provides code enforcement for the issuing of orders on properties with lead hazards that are the primary or supplemental residences of children that tested with elevated blood lead levels in low-to moderate-income census tracts.

The City's policies and procedures outline that all City funded pre-1978 housing rehabilitation projects include a lead-based paint analysis, pre-testing and post-testing, and remediation as necessary by appropriately trained workers.

Actions planned to reduce the number of poverty-level families

The City of Cincinnati has one of the highest poverty rates in the United States, with 24% of households below the poverty level. In order to reduce poverty throughout the jurisdiction, the City has enacted strategies including:

- Economic development programs specifically reducing poverty include workforce development investments through job training programs and small business and entrepreneur lending and technical assistance programs;
- The City provides CDBG funds for operating support for Community Development Corporations (CDCs) operating in 19 neighborhoods throughout the City;
- CDCs assist with poverty reduction in the community by developing housing, revitalizing neighborhood business districts, and providing supportive services for residents;
- The City also follows a number of policies that apply to the majority of contracts and economic incentives, such as prevailing wage, a local living wage, Section 3, local hiring preference, and small, minority, and women-owned business hiring preferences; and
- The City consistently uses the maximum 15% of CDBG funding towards public services activities, such as job training, emergency mortgage assistance, tenant representation, fair housing assistance, and mobility program.

The design and implementation of the plan and the subsequent programs are reflective of the need to

reduce poverty when possible:

- Code Enforcement Relocation;
- Compliance Assistance Repairs for the Elderly;
- Emergency Mortgage Assistance;
- Fair Housing Services;
- Hand Up Initiative;
- Housing Repair Services;
- Operating Support for Community Development Corporations;
- Strategic Housing Initiatives Program;
- Tenant Representation;
- Youth and Young Adult Employment Program;
- Emergency Solutions Grant Rapid Re-housing and Homeless Shelters and Other Homeless Housing Programs;
- Housing Opportunities for Persons With HIV/AIDS Services and Support;
- Community Housing Development Organizations Development Projects;
- American Dream Down-payment Initiative; and
- Single Family Homeownership Development.

Actions planned to develop institutional structure

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

The City partners with a Community Development Advisory Board (CDAB) which evaluates program requests and makes recommendations in coordinating City programs with service providers. The CDAB is a volunteer citizen group appointed by the Mayor and approved by the City Council. The following is the composition of the CDAB according to Cincinnati Municipal Code: community council members (3), lending institutions (1), small business advocate (1), human services (1), trades / labor representation (1), low income advocate (1), housing authority (1), real estate community (1), developer (1), corporate community (1), Community Development Corporation representative (1), and City of Cincinnati employees (4). The CDAB's role is to advise the City Manager on the Consolidated Plan Budget and other matters related to the administration of the City's Consolidated Plan.

Audits conducted by the HUD Office of Inspector General (OIG) of the City's HOME Program in 2007 and 2008 led the City to review its practices and procedures. The City formalized all processes and procedures and provides direction for basic processes in the administration of the Consolidated Plan

programs for the following departments: Office of Budget and Evaluation, Finance Department, City Planning, Purchasing/Procurement, Law, Department, and Community and Economic Development.

HUD has expanded the Integrated Disbursement and Information System (IDIS) for development of the Consolidated Plan, Action Plan, and Consolidated Annual Performance and Evaluation Report processes. The City will continue to utilize these functions and will ensure the policies are coordinated within the City-wide processes and procedures. The City also formed an Integrated Disbursement and Information System (IDIS) monthly working group that focuses on the tracking activities, drawing of funds, and management of the system. The City will continue its efforts to increase overall training of staff, execute consistent and accurate written agreements, and have frequent and regular meetings on improving performance.

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

The City coordinates with public and private housing agencies and social service agencies through the citizen participation process, the Fair Housing Committee, and Continuum of Care (CoC), and the Community Development Advisory Board (CDAB). Additionally, beneficiaries of the City's housing assistance are referred to the Cincinnati Metropolitan Housing Authority (CMHA) to investigate the availability of Section 8 Housing Vouchers. Fair marketing is conducted with assistance of the local fair housing agency, Housing Opportunities Made Equal.

The Continuum of Care (CoC) is organized on a year-round basis to include several working groups whose role is to coordinate services and housing for their specific group of clients, improve access to mainstream resources and benefits, and facilitate improvements in systems needed by the homeless. Each of the working groups meets monthly. The working groups include the following: Family Homelessness Group, Homeless Management Information System (HMIS) Advisory Committee, Homeless Outreach Group, Permanent Supportive Housing Group, Transitional Housing Group, Rapid Rehousing Group, and Homeless Veteran's Group. A representative of each work group, along with representatives from the following entities are seated on the CoC Board: homeless education liaison, Healthcare for the Homeless, Veteran's Services, homeless coalition, Runaway and Homeless Youth, Victim Services Provider, ESG subrecipients, agency executive directors, City of Cincinnati, Hamilton County, UFA/HMIS Lead agency, and at least one homeless or formerly homeless community member. The CoC Board meets monthly to oversee planning, coordinate efforts, and monitor progress

on the goals of the Consolidated Plan.

Discussion:

Program Specific Requirements

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

Introduction:

CDBG, HOME, ESG, and HOPWA are reported on a program year (PY) basis from July 1st through June 30th. The program income amount listed is the amount received to date in PY 2025. All CDBG program income received during the program year will be allocated to established programs of the same year.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	1,057,210
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	1,057,210

Other CDBG Requirements

1. The amount of urgent need activities	1
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

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

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

HOME is reported on a program year (PY) basis from July 1st through June 30th. The program income amount of \$69,060.00 is the amount received in PY 2024 that will be programmed during PY 2025. All program income received during a program year will be allocated to established programs of the same year.

The City of Cincinnati plans to continue to operate its HOME Investment Partnerships Program similar to previous years. As such, other forms of investment of equity payments, interest-bearing and non-interest-bearing loans or advances, interest subsidies, deferred payment loans, grants, and loan guarantees are not planned as part of the 2025 – 2029 Consolidated Plan.

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

Throughout the 2025 – 2029 Consolidated Plan, the City will continue to assist homebuyers directly with down payment assistance through the HOME funded American Dream Downpayment Initiative (“ADDI”) Program. The direct homebuyer assistance provided follows the HOME affordable homeownership limits for the area. Eligible applicants for the ADDI Program are accepted year-round on a first-come first-serve basis and must be first-time eligible homebuyers who will reside in the home as their primary residence for five years. The City defines first-time home buyers as not having owned a home for at least three years. The City does not limit the beneficiaries or provide preference to any population. The City does not intend to utilize subrecipients or CHDOs in administering the ADDI program. Applications for the ADDI program are available at the City’s office and also located on the City of Cincinnati’s website: <https://choosecincy.com>

The City does not currently offer any programs that provide HOME funds for rehabilitation assistance of owner-occupied single-family housing.

Pursuant to 24 CFR 92.254(a)(5)(ii)(A)(2), the City implements, utilizes, and enforces a recapture provision for the ADDI Program through its written funding agreement with the homebuyer, as well as the promissory note, and mortgage required under such agreement, which provides that the

HOME assistance is provided to the homebuyer as a deferred forgivable loan and is reduced on a pro rata basis for each year the recipient homebuyer owns and occupies the home as their primary residence during the stated affordability period. The City utilizes this recapture provision for all assistance to homebuyers. The City does not utilize the resale provision with the homebuyer assistance program. The HOME assistance is provided as a 5-year deferred loan where 20% of the loan balance is proportionally forgiven each year the homebuyer occupies the home as their principal residence.

Any voluntary or involuntary sale, transfer of ownership of the property, or failure to maintain the property as the homebuyer's primary residence triggers the recapture requirements. The amount of the City's HOME assistance subject to recapture is determined by the net proceeds from the sale of the property. In the event that the net proceeds of the sale of the property are insufficient to repay the City the full amount of its HOME investment due, the City will accept the available net proceeds from the property's sale as satisfaction of the City's loan amount provided under the agreement, promissory note, and will release its mortgage encumbering the property.

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

For single family development projects involving new construction, the City provides deferred payment loans to developers that may be forgiven upon sale of each dwelling unit to an eligible income homebuyer whose income does not exceed 80% AMI. The City requires developers to direct interested homebuyers to apply for the City's ADDI Program to determine income eligibility of homebuyers. Upon sale to such eligible homebuyers, the City implements a recapture provision where it will recoup a portion of the HOME assistance provided to homebuyers if the housing does not continue to be occupied as the principal residence of the family for the duration of the affordability period, as further described in the City's ADDI Program, above.

The City follows the affordability periods outline in 24 CFR 92.254(a)(4), but does not intend to provide assistance above \$15,000 under the City's ADDI Program:

The City's HOME investment subject to recapture is based on the amount of HOME assistance that enabled the homebuyer to purchase the dwelling unit. This includes any direct assistance that reduced the purchase price from the fair market value to an affordable price but excludes the difference between the purchase price and the cost of producing the unit, which would be development subsidy to the developer.

Any single family dwelling units constructed with HOME assistance that are not sold by a developer to an eligible homebuyer within the time requirements of 24 CFR 92.254(a)(3) must be converted into rental units, and a restrictive covenant must be recorded against the applicable units requiring the developer rent the units to an eligible tenant as affordable rental housing and that said units

comply with the requirements in 24 CFR 92.252, including the applicable period of affordability. The restrictive covenant puts subsequent purchasers of the property on notice that the property is subject to affordability requirements which must assume the obligations of the remaining affordability period. A mortgage is also recorded against the property as collateral for the City's loan of HOME funds for the length of affordability.

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

The City does not intend to use HOME funding to refinance existing debt during 2025 through 2029.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

The City does not intend to use HOME funding for HOME TBRA activities.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

The City does not intend to use HOME funding for HOME TBRA activities.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

In accordance with the City's approved HOME-ARP Allocation Plan, the following preferences will apply to HOME-ARP rental housing and permanent supportive housing projects. For Rental Housing/Permanent Supportive Housing projects, preference will be given to individuals and households who are eligible under the homeless and at-risk of homelessness Qualifying Populations (QP1 and QP2). Because the City of Cincinnati will use the Cincinnati/Hamilton County CoC's Coordinated Entry System (CES) for assessment and referral to all HOME-ARP projects, there will be prioritization for chronically homeless households, households with the most severe needs and levels of vulnerability, including vulnerability from violence/safety concerns, medical/behavioral health vulnerability, and age (youth 18-24 and seniors 55+). Prioritization will comply with the

Cincinnati/Hamilton County CoC's Coordinated Entry policies. The establishment of the preferences herein comply with all applicable fair housing, civil rights, nondiscrimination and equal opportunity laws and requirements, including but not limited to those requirements listed in 24 CFR 5.105(a) (e.g., Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and Americans with Disabilities Act). The City of Cincinnati will not establish limitations on eligibility for a HOME-ARP project or activity.

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

1. Include written standards for providing ESG assistance (may include as attachment)

ESG funds are used locally to support emergency shelter operations and Rapid Re-housing programs. In order for emergency shelters to receive Emergency Solutions Grant funds, the shelter must be in compliance with the federal regulations outlined in 24 CFR 91 and 576. The City has mandated that participating shelters be monitored and in compliance with the Emergency Shelter Program, Operations, and Facility Accreditation Standards. Staff at Strategies to End Homelessness (STEh), the non-profit organization that administers the ESG program, monitors all emergency shelter agencies annually for compliance. A copy of the Shelter Standards and Shelter Diversion Manual are included as attachments. ESG-funded Rapid Re-housing programs are accessed through the CoC's Coordinated Entry System.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The CoC established the first phase of Coordinated Entry, coordinating entry into emergency shelters, in 2008 when the Central Access Point opened. The second phase of Coordinated Entry, dealing with access to CoC, ESG and VA funded housing programs, began on January 1, 2016. The third phase of the CoC's Coordinated Entry process, referred to as Coordinated Exit, began in July 2015. The Coordinated Entry Manual, covering all three phases, can be viewed at www.strategiestoendhomelessness.org

3. Identify the process for making sub-awards and describe how the ESG allocation available to

private nonprofit organizations (including community and faith-based organizations).

The City of Cincinnati and Hamilton County, as the local ESG recipients, determine the exact amount of ESG funding that will go toward Emergency Shelter and Rapid Rehousing, within HUD requirements. ESG funds may be allocated for the City administration of ESG-eligible activities as needed.

Regarding ESG funding for Emergency Shelter, the CoC Board has adopted a policy approving, and STEH facilitates annually, what is known as the “Prince of Peace” process. This process uses HMIS data pertaining to shelter performance and bed nights provided to allocate funds. Using agreed upon performance measures, identified in collaboration with the ESG recipients and sub-recipients, higher performing projects receive a higher level of funding than poorer performers. After this HMIS data-driven allocation is presented by STEH, the shelter operators meet, with City of Cincinnati and STEH staff present, to review the allocation and corresponding data for accuracy. The final allocation for each agency is then submitted to the City and County for use in their respective budgets and Action Plans.

Regarding ESG funds for Rapid Rehousing, the CoC board works with STEH to release a request for proposal (RFP) to which any organization in the jurisdiction that wants to provide rapid re-housing services can respond, and then to select the most appropriate organization to deliver such services.

The CoC and STEH coordinate efforts with all ten emergency shelter operators within the jurisdiction, including the three operators that do not receive ESG funding.

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

The requirement of 24 CFR 576.406(a) has been met. The City’s Continuum of Care has a HUD-designated primary decision-making group and oversight board referred to as the Homeless Clearinghouse. This group is mandated to have at least one homeless/formerly homeless person as an active member. As the oversight board of the CoC, the Clearinghouse’s responsibilities are:

1. Ensure that the CoC is meeting all of the responsibilities assigned to it by HUD regulations;
2. Represent the relevant organizations and projects serving homeless subpopulations;
3. Support homeless persons in their movement from homelessness to economic stability and affordable permanent housing within a supportive community;
4. To be inclusive of all the needs of all of Cincinnati's and Hamilton County's homeless population, including the special service and housing needs of homeless sub-populations;
5. Facilitate responses to issues and concerns that affect the agencies funded by the CoC that are beyond those addressed in the annual CoC application process. Additionally, STEH monitors all ESG subrecipients annually and subrecipients are required to have a homeless or formerly homeless individual on their agency board.

5. Describe performance standards for evaluating ESG.

Performance measures are included in the Prince of Peace allocation process for Emergency Solutions Grant shelter funding. The starting point allocation divides the funding between shelters based on their number of bed nights and their previous year's outcomes related specifically to positive housing results, and rate of returns to homelessness. Outcomes are compared to the community average for each measure and an agency's allocation increases or decreases based on how their individual outcomes compare to the community averages. Performance measures also include meeting the required match on all expenditures.

Rapid Rehousing projects are evaluated on compliance with regulations, number served, positive exits to housing, income, and recidivism measures. Project falling below community benchmarks may be subject to corrective action.

Rapid rehousing benchmarks will consider specific populations such as youth, families, and high-barrier populations. Emergency Shelter benchmarks will consider "safe beds", family shelter, and shelters for single individuals.

The total amount of administration of ESG is capped at 7.5% annually. The maximum amount allocated for emergency shelter activities will not exceed the greater of 60% of the annual allocation or the 2010 amount committed for homeless assistance activities of \$555,000.

