

The City of Cincinnati's

2014 HUD ACTION PLAN

*For programs to be executed during the City's
FY14 (January 1, 2014 – June 30, 2014) and
FY15 (July 1, 2014 – December 31, 2014)*

2014 Consolidated Plan Action Plan

Table of Contents

Section	Page Number
Action Plan Overview	i
2014 Action Plan Summary	ii
AP-05 Executive Summary	1
PR-05 Lead and Responsible Agencies.....	5
AP-10 Consultation	6
AP-12 Participation	12
AP-15 Expected Resources.....	16
AP-20 Annual Goals and Objectives.....	20
AP-35 Projects.....	27
AP-38 Projects Summary	29
AP-50 Geographic Distribution	58
AP-55 Affordable Housing.....	59
AP-60 Public Housing	61
AP-65 Homeless and Other Special Needs Activities.....	62
AP-70 HOPWA Goals	68
AP-75 Barriers to Affordable Housing.....	69
AP-85 Other Actions.....	71
AP-90 Program Specific Requirements	76
Attachment 1 – Consolidated Plan Goals and Objectives	
Attachment 2 – Citizen Participation Comments	
Attachment 3 - Fair Housing Activities Update	
Attachment 4 – Consolidated Plan Project Summaries and Progress to Date	
Attachment 5 – Entitlement Grant Program Budgets by Con Plan Goal and Objective	

ACTION PLAN OVERVIEW

The City of Cincinnati's 2014 Annual Action Plan presents a series of initiatives to be accomplished between January 1, 2014 and December 31, 2014, which corresponds to the City's Fiscal Year 2014 (January 1, 2014 to June 30, 2014) and Fiscal Year 2015 (July 1, 2014 to December 31, 2014). The purpose of the Action Plan is to ensure that public services, economic development, and housing services are delivered in an efficient and effective manner. The Action Plan identifies and seeks to implement various programs administered and subsidized with the use of federal funds. Most important the Action Plan is a reflection of the annual goals and objectives set-forth in the Five-Year Consolidated Plan 2009-2014.

The Action Plan is submitted annually to the U.S. Department of Housing and Urban Development (HUD) and constitutes an application for funds under the following federal formula grants:

- Community Development Block Grant (CDBG)
- Home Investment Partnership (HOME);
- Housing Opportunities for Persons with AIDS (HOPWA);
- Emergency Solutions Grant (ESG); and

The Action Plan is a comprehensive plan that identifies key initiatives that would significantly improve the quality of life and/or financial stability of Cincinnati residents. The plan is derived from the goals established in the 5 Year Consolidated Plan and it is formulated in a collaborative manner with the assistance of Cincinnati staff across various departments. In addition, the plan is integrated with contributions from public forums and the Community Development Advisory Board discussions.

City of Cincinnati
2014 Consolidated Plan Action Plan Summary

CDBG, HOME, ESG and HOPWA Summary

- The 2014 Revised Action Plan includes programs to be funded by four entitlement grants from the U.S. Department of Housing and Urban Development (HUD), including: Community Development Block Grant (CDBG); HOME Investment Partnership Program (HOME); Emergency Solutions Grant (ESG); and Housing Opportunities for Persons with AIDS (HOPWA) Program.
- 2014 Action Plan Resource Estimates reflect grant awards as posted online on March 18, 2014 and are outlined in the table below. Adjustments were made from the Proposed Action Plan submitted on November 15, 2013.

Summary of Resources

	2013 Appropriated	2014 Award
CDBG		
Entitlement Grant	\$11,275,150	\$11,059,989
Program Income	\$1,000,000	\$1,300,000
Unallocated Prior-year resources	<u>\$140,407</u>	<u>\$0</u>
Total	\$12,415,557	\$12,359,989
HOME		
Entitlement Grant	\$2,092,556	\$2,099,044
Program Income	\$150,000	\$150,000
Unallocated Prior-year resources	<u>\$530,391</u>	<u>\$0</u>
Total	\$2,772,947	\$2,249,044
ESG		
Entitlement Grant	\$811,284	\$915,979
Unallocated Prior-year resources	<u>\$10,000</u>	<u>\$0</u>
Total	\$821,284	\$915,979
HOPWA		
Entitlement Grant	\$643,006	\$672,639
Sunset Resources	\$50,472	\$0
Unallocated Prior-year resources	<u>\$51,674</u>	<u>\$0</u>
Total	\$745,152	\$672,639
Grand TOTAL	\$16,754,940	\$16,197,651

2014 CDBG Summary

In 2013, \$9,137,938 was allocated for 26 CDBG programs. The 2014 Action Plan includes a budget of \$9,134,189 for 27 programs. In order to separately track job training and housing repairs, the Blueprint for Success was split into two programs with Blueprint for training expenses and Compliance Assistance Repairs for the Elderly (CARE) for housing repairs.

2014 CDBG Program Requests by CDBG Objective

CDBG Goal	2013 Approved	2014 Award
<i>Housing Development</i>	\$2,961,185	\$3,062,365
<i>Economic Development</i>	\$3,716,753	\$3,306,575
<i>Slum & Blight Elimination</i>	\$2,375,000	\$2,693,000
<i>Citizen Safety</i>	\$85,000	\$72,250
<i>Planning and Administration</i>	<u>\$3,082,940</u>	<u>\$3,203,973</u>
TOTAL	\$12,220,878	\$12,338,162

CDBG Project funding includes project delivery costs which can range from 5% to 10% of total project funding for most projects. Project delivery costs include staff time, legal costs, and supplies.

Program administration costs are restricted to no more than 20% of the current year grant plus program income. Proposed funding of \$2,326,285 is less than the 20% cap of \$2,471,998.

Public Services cannot exceed 15% of the current year grant award and prior year program income. Proposed funding for Public Services programs is \$1,712,259, which is below the estimated 15% cap of \$1,808,998.

Slum and Blight activities cannot exceed 30% of the total CDBG funding expended on programs. Proposed funding for Slum and Blight activities total \$2,394,000, which is below the estimated cap of \$2,740,257.

2014 HOME Summary

A total of \$ 2,024,140 in HOME resources is planned in 2014 for the Department of Trade & Development for seven eligible housing activities.

2014 ESG and HOPWA Summary

The ESG and HOPWA requests are submitted by Strategies to End Homelessness. The estimated funding available for ESG and HOPWA in 2014 is \$915,979 and \$672,639 respectively. The estimated ESG funding includes funding for homelessness prevention activities required by the Hearth Act.



Executive Summary

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

1. Introduction

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

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.

Development Vision Statement

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

Overall Development Goal

The City's overall development goal is to develop and support comprehensive efforts to expand choices and opportunities for individuals and families to enjoy decent housing, a suitable living environment, and expanded economic opportunities. Decent housing is affordable, safe, and accessible. A suitable living environment is safe, livable, free from blighting influences, and economically integrated.

3. Evaluation of past performance

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

Past performance issues are discussed throughout this plan and annually in the Consolidated Annual Performance and Evaluation Report (CAPER).

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City of Cincinnati's Department of Trade and Development manages the development of the plan for the CDBG, HOME, ESG, and HOPWA funding. The City of Cincinnati's Department of Trade and Development, in conjunction with the City of Cincinnati's Office of Budget and Evaluation, provided guidance to all City departments and subrecipients receiving program funding. In August, departments and subrecipients submit requests for resources to the Department of Trade and Development and to the Office of Budget and Evaluation. Requests are compiled and provided for public review in the draft Annual Action Plan. The Action Plan document is posted on the City's website and provided to all participants during the pre-scheduled public hearing. A more detailed summary of the citizen participation process is included in the AP-12 Participation section of this Action Plan.

Following the public hearing, the Department of Trade and Development and the Office of Budget and Evaluation reconciles requests with estimated resources and presents a Recommended Annual Action Plan to the City's Executive Budget Committee. The Executive Budget Committee is comprised of the City Manager, Assistant City Managers, Finance Director, Budget Director, and other key executive staff. The Office of Budget and Evaluation receives the recommendations of the Executive Budget Committee and submits a Recommended Annual Action Plan to City Council's Budget and Finance Committee in October for deliberation, and a Final Action Plan will be presented to City Council for approval. The City Council approval process includes a final opportunity for public input.

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.

A public hearing was held in City of Cincinnati offices at Centennial II Plaza on September 12, 2013, to receive public comments regarding the Recommended Annual Action Plan which was available for

review and comment on the City of Cincinnati's Department of Trade and Development's web page beginning August 28, 2013. Notice of this Public Hearing has been widely distributed. Paid advertisement was published in the Cincinnati Enquirer on August 28, 2013. Additionally, the notice was

posted in the City Bulletin on August 28 and September 4. Notice of the Public Hearing was provided to a wide array of community and nonprofit organizations including all of the Cincinnati Community Councils via e-mail. Social media, including Facebook and Twitter was also utilized to notify public. Prior to the meeting, staff fulfilled one phone request to mail the document to a resident.

A public hearing will be held in City of Cincinnati offices at Centennial II Plaza behind City Hall on September 12, 2013, to receive public comments on the Recommended Annual Action Plan. The Action Plan which was available for review and comment on the City of Cincinnati's Department of Trade and Development's webpage on August 28, 2013. Notice of this Public Hearing has been widely distributed. Paid advertisement was published in the Enquirer on August 28, 2013. The notice was run in the City Bulletin on August 28, 2013 and September 4, 2013 as well. Notice of the Public Hearing was emailed to a wide array of community and nonprofit organizations including all Cincinnati Community Councils and the Affordable Housing Advocates Network. The notice was posted on Facebook and Twitter and shared via those platforms.

Opening comments and introductions were made by Kiya Patrick, Community Development Administrator. Attendees were provided information regarding the categories and levels of HUD funding expected to be available in 2014; in addition to the types of projects expected to be undertaken. Seven of the 12 individuals in attendance spoke formally. Two people spoke against the Commons on Alaska project which is funded with prior year HOME funds; and five people spoke in favor of these five existing programs: Historic Stabilization of Structures, Fair Housing, Tenant Based Rental Assistance, Emergency Mortgage Assistance, Neighborhood Business District Improvement Program, Operating Support for Community Development Corporations, as well as the former Homesteading Program.

The City received three additional public comments through e-mail in support of the Drug Elimination Program. The City received one request for a mailed copy of the Action Plan, one phone call in support of the Summer Youth Employment Program and one call with concerns about the cuts in Fair Housing program funding. No additional emails or letters were received.

A detailed description of all comments received at the Public Hearing is provided in the Citizen Participation Comments attachment in AD-26.

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

The funding for the Commons on Alaska project was funded with prior year HOME funds and is not included in this Action Plan. Other comments in support of six existing programs - Historic Stabilization of Structures, Fair Housing, Tenant Based Rental Assistance, Emergency Mortgage Assistance, Neighborhood Business District Improvement Program, Operating Support for Community Development Corporations and Drug Elimination Program- were considered in making funding levels for these

programs. Some programs received higher than 15% funding cuts due to prior year resources being available for future projects. The former Homesteading Program was not included for funding due to a lack of resources.

7. Summary

The citizen participation process included engagement from a variety of residents and community leaders. The comments provided were thoroughly analyzed and considered in the development of this Action Plan.

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	City of Cincinnati	Department of Trade and Development
CDBG Administrator	City of Cincinnati	Department of Trade and Development
HOPWA Administrator	City of Cincinnati	Department of Trade and Development
HOME Administrator	City of Cincinnati	Department of Trade and Development
ESG Administrator	City of Cincinnati	Department of Trade and Development
HOPWA-C Administrator	N/A	N/A

Table 1 – Responsible Agencies

Narrative (optional)

Lead Agency

The Department of Trade and Development administers the City's Consolidated Plan grants in conjunction with the Office of Budget and Evaluation. In 2014, individual projects will be administered by the following City Departments or through qualified sub-recipients selected by each department: Department of Trade and Development, Parks Department, Department of Public Services, Health Department and Police Department.

The City of Cincinnati contracts with Strategies to End Homelessness (STEh) to facilitate the administration, implementation and monitoring of programs related to the Continuum of Care for the Homeless, the Emergency Solutions Grant (ESG), Housing Opportunities for Persons With AIDS (HOPWA), and the Shelter Plus Care Program.

Consolidated Plan Public Contact Information

Kiya Patrick, Community Development Administrator

Department of Trade and Development

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

1. Introduction

The City coordinates with key organizations and individuals as described below.

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 City partnered with Hamilton County to update the Impediments to Fair Housing study for the 2010-2014 Consolidated Plan. The update was received in May 2009 and a joint committee representing Hamilton County, Cincinnati Community Development, City Planning and Buildings, and Budget and Evaluation met regularly throughout 2010 to evaluate the findings in the Update, and develop strategies to implement solutions to the findings. In addition, a citizen's advisory committee provided guidance on addressing the impediments. On July 20, 2010, the City Manager submitted the City's Fair Housing Action Plan which directs the City's fair housing efforts for 2010 to 2014 during the next few years. The joint committee between County and City staff continue to meet regularly to work to resolve each of the 18 identified impediments. A more detailed narrative regarding Fair Housing is provided as an Appendix in AD-26.

CMHA hired a new Executive Director last year who is implementing community outreach and engagement throughout both the City of Cincinnati and Hamilton County. The City and CMHA staff have held initial discussions to collaborate on future development projects.

The City partners with its Community Development Advisory Board (CDAB) to enhance coordination. This volunteer citizen group provides Consolidated Plan recommendations to the City Manager and 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.

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.

The City of Cincinnati and Hamilton County collaborate to determine the level of funding for each ESG eligible activity (street outreach, emergency shelter, homeless prevention, rapid re-housing, HMIS, and administration) with input from the Continuum of Care or CoC Board, known as the Homeless Clearinghouse. Currently, ESG funds are used for homelessness prevention and emergency shelter only.

Homelessness Prevention: The CoC lead agency, Strategies to End Homelessness, administers the ESG funding allocated to homelessness prevention- in collaboration with the United Way of Greater Cincinnati's Emergency Assistance system and agencies. At risk households are identified through the Central Access Point (CAP) hotline (the CoC's centralized intake service), and connected with case management and direct financial assistance through one of five United Way agencies.

Emergency Shelter: ESG emergency shelter funds are allocated through a community process developed and overseen by, the CoC lead agency, Strategies to End Homelessness (STEH). Interested providers must participate in the Homeless Management Information System (HMIS), VESTA system, in order to apply for funding. Following the verification of applications, providers gather annually to review the needs within the community and to allocate the funds. Allocation recommendations are forwarded to the City of Cincinnati's Department of Trade and Development for evaluation and inclusion in the Annual Action Plan.

STEH, the CoC lead agency, is contracted by the City and County to serve as the ESG fiscal agent, monitor sub-recipient performance, evaluate outcomes, and consult with the CoC board regarding any potential action to be taken against poor performers. The CoC has designated the "Prince of Peace" process to allocate ESG shelter operations funding. STEH facilitates the annual "Prince of Peace" process to allocate ESG shelter operation funding, an allocation based upon program performance. Higher performing projects, as determined by HMIS data, are recommended for a higher level of funding than poorer performers. The allocation process is based on established performance measures developed in collaboration with the ESG recipients and sub recipients. The process includes baseline funding for each agency that has submitted an application for the funding. During the annual Price of Peace meeting, each agency provides a brief program description and requests changes to the proposed allocation. A consensus is reached regarding the final allocation for each agency and the allocation is submitted to the City and County for inclusion in their respective Action Plans. If issues arise with any ESG funded emergency shelter, issues are brought to the attention of the Homeless Clearinghouse, the CoC Board.

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, and Hamilton County, contract with Strategies to End Homelessness, the CoC Lead Agency, to facilitate the CoC process locally. Both the City and the County maintain seats on the CoC Board, known as the Homeless Clearinghouse. The CoC Board is the entity that directly oversees the CoC's project prioritization process, which includes the development of performance standards for both CoC and ESG, funded projects. Evaluation of individual project outcomes, as well as establishment of community standards for program achievement, are overseen by the City and County, as a part of the Homeless Clearinghouse, and are based on HMIS-generated outcome data. All CoC and ESG funded projects are required to participate in the local HMIS system.

In addition, local CoC efforts are coordinated with the Ohio Department of Development, which oversees CoC and ESG funding at the state level. All projects applying for ESG funding from ODOD must first consult with STEH, and document that the funding requested from ODOD will be used in a manner consistent with the goal and objective of the local CoC.

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

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 Community Councils Neighborhood Organization Private Sector Banking / Financing
	What section of the Plan was addressed by Consultation?	Action Plan
	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 to provide the City with feedback and recommendation on the CDBG and HOME programs. Specifically, the CADB provides guidance to the City on how resources should be allocated 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-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 Foundation Private Sector Banking / Financing

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Action Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As described above, STEH is the Cincinnati and Hamilton County Continuum of Care that provides guidance on homeless programs, including ESG.

Table 2 – Agencies, groups, organizations who participated

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

The City consults a variety of agencies in the Action Plan process covering most of the types listed above.

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 (STEH)	The Homeless to Homes Plan was developed with input from non-profit organizations, the business community, faith-based organizations, local government, funders, and non-profit organizations. Then, the homeless population goals and objectives were developed with input from the Homeless to Homes Plan and the City of Cincinnati Administration. The Hamilton County Commission, as well as the County Department of Community Development were also consulted during the development of the recommendations in order to ensure that a consistent plan is being implemented across both jurisdictions.

Table 3 – Other local / regional / federal planning efforts

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 re-established the Community Development Advisory Board (CDAB) in 2011. The CDBG and HOME program requests were reviewed by the CDAB members. The CDAB members provided the City Administration with feedback on the level of priority that should be given to each program. Additionally, the CDAB hosted the public hearing of the Annual Action Plan. The CDAB received public comment and incorporated their comments into their recommendations to the City.

The public hearing hosted by the CDAB was held in City of Cincinnati offices at Centennial II Plaza on September 12, 2013, to receive public comments regarding the Recommended Annual Action Plan. The Action Plan which was available for review and comment on the City of Cincinnati's Department of Trade and Development's web page beginning August 28, 2013. Notice of this Public Hearing has been widely distributed. Paid advertisement was published in the Enquirer on August 28, 2013. Additionally, the notice was posted in the City Bulletin on August 28, 2013 and September 4, 2013. Notice of the Public Hearing was provided to a wide array of community and nonprofit organizations including all of the Cincinnati Community Councils via e-mail. Social media such as Twitter was utilized to notify the Affordable Housing Advocates network.

The public hearing was held in City of Cincinnati offices at Centennial II Plaza, which is an accessible facility. Other accommodations for sight or hearing-impaired persons and for non-English speaking persons were available upon request. In finalizing its 2014 Action Plan Budget, the City accepted comments received from citizens at the public hearing and in writing 30 days after the publication of the 2014 Action Plan budget.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response and attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
1	Public Hearing	Non-targeted/broad community	Twelve people attended and seven of these individuals spoke during the hearing.	Two people spoke against the Commons on Alaska project which is funded with prior year HOME funds; and five people spoke in favor of these five existing programs: Historic Stabilization of Structures, Fair Housing, Tenant Based Rental Assistance, Emergency Mortgage Assistance, Neighborhood Business District Improvement Program, Operating Support for Community Development Corporations, as well as the former Homesteading Program.	The funding for the Commons on Alaska project was funded with prior year HOME funds and is not included in this Action Plan. Other comments in support of five existing programs (Historic Stabilization of Structures, Fair Housing, Tenant Based Rental Assistance, Emergency Mortgage Assistance, Neighborhood Business District Improvement Program, and Operating Support for Community Development Corporations) is included at the same proportionate level as 2013 as anticipated cuts were applied equally to all programs. The former Homesteading Program was not included for funding due to a lack of resources.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response and attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
2	Newspaper Ad	Non-targeted/broad community	Same as above			
3	Emails to community leaders	Community leaders and subrecipient organizations	The majority of response to the emails sent was seen in the attendance at the public hearing as outlined above. Three additional emails were received in support of the Drug Elimination Program as well.			

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response and attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
4	Formal Written Statements	Community Leaders and subrecipients	In response to emails and the public hearing notice, we received three formal written statements included in Attachment 2 Citizen Comments. Two are from subrecipients, Housing Opportunities Made Equal and Greater Cincinnati Legal Aid Society. The third is from the Community Development Advisory Board.	Subrecipient feedback supports existing programs and CDAB feedback sets priorities for funding programs.	All feedback was considered in making final funding decisions.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Total estimated Consolidated Plan resources are just over \$16 million. This includes CDBG, HOME, ESG, and HOPWA.

Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	11,059,989	1,300,000	0	12,359,989	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	2,099,044	150,000	0	2,249,044	0	
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	672,639	0	0	672,639	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	915,979	0	0	915,979	0	

Table 4 - 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

All of the City's Consolidated Plan programs generate leverage and meet the required match standards. Federal resources are an important element of many of the housing and economic development projects funded by the City. These projects require a variety of sources including, federal, state, local, and private dollars, to make them happen.

Of the City's 25 CDBG programs, 10 of the programs generate leverage. The City estimates \$16 million in leveraged resources in 2014 from CDBG. Of the City's six HOME programs, four of the programs generate leverage. The City estimates \$19 million in leveraged resources in 2014 from HOME. For both CDBG and HOME, the leveraged resources include private investment, state and federal grants, volunteer hours, and in-kind donations. Leverage varies from year to year based in part on the projects that are funded.

Strategies to End Homelessness (STEH) has developed policies and procedures for monitoring recipients of CoC funding, which include reviewing documentation of matching funds.

Dollar-for-dollar match is verified for all Emergency Solutions Grant funds. Shelter providers must define their match upon submission of ESG budgets, prior to contract award, and prior to expenditures. During the annual monitoring visit, sub-recipients must verify their match and provide Strategies to End Homelessness (STEh) with a copy of the match certification. Sub-recipients are also asked at the end of each year to document the leverage for their programs. The Department of Trade and Development reviews all of the information gathered from STEh. Strategies to End Homelessness also manage the Shelter Diversion program and provide the required match for the remaining funds.

Additionally, STEh manages the The CoC program including Shelter Plus Care and Supportive Housing Program funding. During the annual prioritization process, each sub-recipient must submit a budget on a standardized template, demonstrating the required match for the program. Commitment letters with the source of the funds are required for cash or in-kind match. Commitment letters for cash match must be from the recipient of CoC funds; commitment letters for in-kind match must be submitted from the agency providing the service/item and the letter demonstrate commitment to a Memorandum of Understanding.

Finally, HOPWA funds match the 100 Shelter Plus Care units designated to serve homeless persons with HIV/AIDS within the Cincinnati/Hamilton County Continuum of Care., HOPWA supportive services dollars provide a portion of the required “plus care” match. These 100 Shelter Plus Care subsidies increase the availability of safe, decent, and affordable housing options to low-income persons living with HIV/AIDS. Strategies to End Homelessness monitors HOPWA sub-recipients for leveraged funds to be included in the Consolidated Annual Performance and Evaluation Report.

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

This is not applicable.

Discussion

This is not applicable.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

No Goals Found

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeownership Housing Development	2014	2014	Affordable Housing	City-wide		CDBG: \$460,000 HOME: \$561,731	Homeowner Housing Added: 19 Household Housing Unit
2	Homeowner Supportive Services	2014	2014	Affordable Housing	City-wide		CDBG: \$2,097,930 HOME: \$203,125	Public service activities for Low/Moderate Income Housing Benefit: 120 Households Assisted Homeowner Housing Rehabilitated: 1420 Household Housing Unit Direct Financial Assistance to Homebuyers: 43 Households Assisted
3	Rental Housing Development	2014	2014	Affordable Housing	City-wide		CDBG: \$100,000 HOME: \$580,277	Rental units rehabilitated: 50 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Renters Supportive Services	2014	2014	Affordable Housing	City-wide		CDBG: \$237,375 HOME: \$400,000	Public service activities for Low/Moderate Income Housing Benefit: 585 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 145 Households Assisted
5	Promote Fair Housing	2014	2014	Fair Housing	City-wide		CDBG: \$167,060	Public service activities for Low/Moderate Income Housing Benefit: 806 Households Assisted
6	Promote Commercial and Industrial Development	2014	2014	Economic Development	City-wide		CDBG: \$920,000	Facade treatment/business building rehabilitation: 58 Business
7	Industrial Site Redevelopment	2014	2014	Economic Development	City-wide		CDBG: \$555,000	Brownfield acres remediated: 2 Acre
8	Promote Business Development Opportunities	2014	2014	Economic Development	City-wide		CDBG: \$788,700 HOME: \$110,000	Public service activities other than Low/Moderate Income Housing Benefit: 16698 Persons Assisted Jobs created/retained: 3 Jobs Other: 16 Other
9	Job Training Services	2014	2014	Low and Moderate Income Clientele	EMPOWERMENT ZONE City-wide		CDBG: \$1,042,874	Public service activities other than Low/Moderate Income Housing Benefit: 386 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
10	Slum and Blight Elimination	2014	2014	Quality of Life	EMPOWERMENT ZONE City-wide		CDBG: \$2,394,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 48878 Persons Assisted Rental units rehabilitated: 0 Household Housing Unit Homeowner Housing Rehabilitated: 0 Household Housing Unit Buildings Demolished: 355 Buildings Housing Code Enforcement/Foreclosed Property Care: 3881 Household Housing Unit
11	Citizen Safety	2014	2014	Quality of Life	EMPOWERMENT ZONE		CDBG: \$72,250	Public service activities other than Low/Moderate Income Housing Benefit: 7099 Persons Assisted
12	Homeless Shelters & Other Homeless Housing Support	2014	2014	Homeless	City-wide		HOME: \$169,007 ESG: \$450,000	Homeless Person Overnight Shelter: 4441 Persons Assisted Housing for Homeless added: 10 Household Housing Unit
13	Homeless Prevention	2014	2014	Homeless	City-wide		ESG: \$397,281	Homelessness Prevention: 150 Persons Assisted
14	Operating Support for HIV/AIDS Housing Facilities	2014	2014	Non-Homeless Special Needs	City-wide		HOPWA: \$215,000	HIV/AIDS Housing Operations: 50 Household Housing Unit
15	Supportive Services for Persons with HIV/AIDS	2014	2014	Non-Homeless Special Needs	City-wide		HOPWA: \$101,813	HIV/AIDS Housing Operations: 124 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
16	Housing Assistance for Persons with HIV/AIDS	2014	2014	Non-Homeless Special Needs	City-wide		HOPWA: \$335,647	Tenant-based rental assistance / Rapid Rehousing: 27 Households Assisted HIV/AIDS Housing Operations: 286 Household Housing Unit

Table 5 – Goals Summary

Goal Descriptions

1	Goal Name	Homeownership Housing Development
	Goal Description	This goal promotes the development of new homeownership housing as well as the preservation of existing homeownership housing. The projects that support this goal include: Strategic Housing Initiatives, Homeowner Rehab Loan Program, and Single Family Homeownership Development.
2	Goal Name	Homeowner Supportive Services
	Goal Description	This goal provides financial assistance to new and current homeowners. The projects that support this goal are the Down Payment Initiative, Emergency Mortgage Assistance, Housing Repair Services and the Compliance Assistance Repairs for the Elderly (CARE) program.
3	Goal Name	Rental Housing Development
	Goal Description	This goal promotes the rehabilitation of rental housing for low to moderate income residents. The project that supports this goal is the Rental Rehabilitation Program.
4	Goal Name	Renters Supportive Services
	Goal Description	This goal provides services and financial assistance to renters. The projects that support this goal are Code Enforcement Relocation, Tenant Representation, Section 8 Mobility Program, and Tenant Based Rental Assistance.

5	Goal Name	Promote Fair Housing
	Goal Description	This goal promotes and supports fair housing practices in the city. The project that supports this goal is Fair Housing Services.
6	Goal Name	Promote Commercial and Industrial Development
	Goal Description	This goal promotes development and redevelopment in the city's neighborhoods. The program through which this goal is met is the Neighborhood Business District Improvement Program.
7	Goal Name	Industrial Site Redevelopment
	Goal Description	This goal promotes the redevelopment of brownfields within the city and is completed through the Strategic Program for Urban Redevelopment (SPUR) program.
8	Goal Name	Promote Business Development Opportunities
	Goal Description	This goal promotes the development of businesses and other organizations that improve economic opportunities in the City. The projects that support this goal are Small Business Services and Technical Assistance, Small Business Loan Fund, Financial and Credit Union Services, Earned Income Tax Credit Outreach and Financial Literacy, Findlay Market - Nonprofit Capacity Building & Urban Gardens, and Neighborhood Capacity Building and Technical Assistance.
9	Goal Name	Job Training Services
	Goal Description	This goal provides opportunities for low to moderate income individuals to receive job training. The programs that support this goal are Blueprint for Success and Summer Youth Employment.
10	Goal Name	Slum and Blight Elimination
	Goal Description	This goal promotes sustainable neighborhoods by eliminating blighting influences. The projects that support this goal are Concentrated Code Enforcement, Hazard Abatement, Mill Creek Greenway Program, Lead Hazard Testing Program, Future Blooms, and the Historic Structures Stabilization Program.
11	Goal Name	Citizen Safety
	Goal Description	This goal promotes public safety in targeted areas to create better communities which is accomplished through the Drug Elimination Program.

12	Goal Name	Homeless Shelters & Other Homeless Housing Support
	Goal Description	This goal supports emergency shelter operations and essential supportive services for shelter residents as well as the development of supportive housing for chronically homeless individuals. The projects that support this goal is the ESG Homeless Shelters and the Homeless to Homes – Permanent Supportive Housing project.
13	Goal Name	Homeless Prevention
	Goal Description	This goal supports a shelter diversion program that will serve individuals and families at risk of becoming homeless. The project that supports this goal is the ESG Homeless Shelters and Homelessness Prevention project.
14	Goal Name	Operating Support for HIV/AIDS Housing Facilities
	Goal Description	This goal is accomplished by providing support to the operation of Caracole’s housing facility for homeless persons with HIV/AIDS.
15	Goal Name	Supportive Services for Persons with HIV/AIDS
	Goal Description	This goal supports services for homeless HIV/AIDS persons including temporary housing with medical support, outreach services and case management. Funding is provided to Caracole, the Cincinnati Center for Respite Care and the Northern Kentucky Independent Health District to meet this goal.
16	Goal Name	Housing Assistance for Persons with HIV/AIDS
	Goal Description	This goal supports keeping HIV/AIDS persons in housing. Assistance is provided in the form of short-term rent/mortgage and utility assistance as well as longer term tenant based rental assistance. Funding is provided to Caracole and the Northern Kentucky Independent Health District to meet this goal.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

In general, the City uses HOME Investment Partnership dollars for affordable housing projects. The table below estimates the number of individuals, by income category, the City will provide affordable housing. This estimate is based on the results in the HOME Summary of Accomplishments report in the 2012 CAPER.

Income Categories	2012 CAPER %	2014 HOME Goals
0-30%	56%	215
31%-50%	22%	83
51%-60%	9%	35
61%-80%	13%	51
Total	100%	384

AP-35 Projects – 91.220(d)

Introduction

The City has a total of 36 projects for its four grant programs - CDBG, HOME, HESG, and HOPWA. These projects allow the City to address housing, economic development, quality of life and homeless goals and objectives as outlined in this Annual Action Plan.

#	Project Name
1	Strategic Housing Initiatives Program
2	Homeowner Rehab Loan Program
3	Single Family Homeownership Development
4	Housing Repair Services
5	Emergency Mortgage Assistance Program
6	Downpayment Initiative
7	Rental Rehabilitation Program
8	Code Enforcement Relocation
9	Tenant Representation
10	Section 8 Mobility Program
11	Tenant Based Rental Assistance
12	Fair Housing Services
13	Neighborhood Business District Improvement Program
14	Strategic Program for Urban Redevelopment
15	Small Business Services and Technical Assistance
16	Small Business Loan Fund
17	Findlay Market - Nonprofit Capacity Building
18	Earned Income Tax Credit and Financial Literacy
19	Financial and Credit Union Services
20	Neighborhood Capacity and Technical Assistance
21	Blueprint for Success
22	Summer Youth Employment Program
23	Concentrated Code Enforcement
24	Hazard Abatement Program
25	Mill Creek Greenway Restoration
26	Lead Hazard Testing Program
27	Future Blooms
28	Historic Stabilization of Structures
29	Drug Elimination Program
30	Homeless to Homes Permanent Supportive Housing
31	Homeless Shelters & Homelessness Prevention
32	Caracole House

#	Project Name
33	Center for Respite Care
34	Northern Kentucky Independent District Health
35	Compliance Assistance Repairs for the Elderly (CARE)
36	Administration
37	Findlay Market - Urban Gardens
38	Section 108 Loan Debt Service

Table 6 – 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 and 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 for addressing the City of Cincinnati needs is a lack of funding.

Projects

AP-38 Projects Summary

Project Summary Information

1	Project Name	Strategic Housing Initiatives Program
	Target Area	City-wide
	Goals Supported	Homeownership Housing Development
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$400,000 HOME: \$341,731
	Description	The Strategic Housing Initiatives program provides for targeted investments in housing projects consisting of at least four housing units throughout the City's neighborhoods with a primary emphasis on homeownership opportunities.
	Target Date	12/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	The number of families assisted will vary depending on the projects that are funded. All families will be low to moderate income and will likely be homeowners; however, the program allows for rental rehab of 1-4 unit buildings as well.
	Location Description	Location depends on projects funded.
	Planned Activities	Specific projects will be decided in 2014 based on program selection criteria.
2	Project Name	Homeowner Rehab Loan Program
	Target Area	City-wide

	Goals Supported	Homeownership Housing Development
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$40,000
	Description	The Homeowner Rehab Loan program (HRLP) provides low-interest deferred loans and lead grants to low and moderate-income homeowners to correct building code violations; improve accessibility; enhance emergency conservation; and stabilize safe, sanitary housing citywide. This program currently services loans made in prior years. New rehabilitation work is on hold while the City reevaluates the program.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	No new families will be assisted.
	Location Description	City-wide
	Planned Activities	No new loans are being made at this time pending further review of the program. This funding will provide servicing of 300 to 400 existing loans via an outside contractor.
3	Project Name	Single Family Homeownership Development
	Target Area	City-wide
	Goals Supported	Homeownership Housing Development
	Needs Addressed	No Priority Needs
	Funding	HOME: \$220,000

	Description	The program is designed to reimburse Habitat for Humanity for water and sewer tap fees, building permit fees, water permit fees, remote meter fees, a developer fee and other approved fees related to the construction of eligible new single family dwellings. The program also includes eligible infrastructure and construction costs for newly constructed or rehabilitated units, demolition costs, and construction modifications to blend units with existing neighborhood styles or address accessibility issues, and homebuyer assistance.
	Target Date	12/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	The number of families assisted will vary depending on projects funded, but we estimate 6 families for 2014. All families will be low to moderate income and will be homeowners.
	Location Description	City-wide
	Planned Activities	Homes and homeowners are selected by Habitat for Humanity for each year. The homes are often clustered in one area for maximum efficiency in rehabilitation and/or new construction efforts. Homes can be new construction or rehabilitated.
4	Project Name	Housing Repair Services
	Target Area	City-wide
	Goals Supported	Homeowner Supportive Services
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$1,868,685
	Description	Housing Repair Services provide grants for emergency and critical repairs to very low-income homeowners. Emergency Services are limited to two emergencies per household per year and have a maximum of \$2,500. Critical repairs are those needed for the safety of the client and have a maximum of \$10,000. This program also provides forgivable loans and grants to low income, elderly homeowners to correct code violations issued pursuant to Neighborhood Enhancement Program exterior inspections.
	Target Date	12/31/2014

	Estimate the number and type of families that will benefit from the proposed activities	1400 families should be assisted; all will be very low income; and many will be elderly.
	Location Description	City-wide
	Planned Activities	Eligible homeowners are selected on a first-come, first-serve basis until all funding is expended for emergency and critical repairs to very low-income homeowners. Emergency Services are limited to two emergencies per household per year and have a maximum of \$2,500. Critical repairs are those needed for the safety of the client and have a maximum of \$10,000. This program also provides forgivable loans and grants to low income, elderly homeowners to correct code violations issued pursuant to Neighborhood Enhancement Program exterior inspections.
5	Project Name	Emergency Mortgage Assistance Program
	Target Area	City-wide
	Goals Supported	Homeowner Supportive Services
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$98,000
	Description	The Emergency Mortgage Assistance program provides up to three months of mortgage payments for low-income City of Cincinnati homeowners facing foreclosure due to job loss, illness, death of the primary wage earner, or other circumstances beyond their control. Homeowners may receive this assistance to bring their loan current if they have reestablished an income stream. All clients in mortgage trouble receive in-depth foreclosure prevention counseling and case management that links them with other social service agencies.
	Target Date	8/31/2015
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 100 families will be assisted.

	Location Description	City-wide
	Planned Activities	Eligible residents are selected on a first-come, first-serve basis until all funds are expended. This program is on a contract from September 2014 to August 2015.
6	Project Name	Downpayment Initiative
	Target Area	City-wide
	Goals Supported	Homeownership Housing Development
	Needs Addressed	No Priority Needs
	Funding	HOME: \$203,125
	Description	The Down Payment Initiative program funds down payment assistance, which is used towards the purchase of single family housing by low to moderate income owner-occupant families who are first-time homebuyers. Eligible project costs include down payment and closing costs.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 30-35 families will be assisted and all will first time homebuyers.
	Location Description	City-wide
	Planned Activities	This program provides downpayment assistance for first time homeowners, the amount of which varies depending on the financial needs of the individuals and families purchasing their homes. The program also provides payments to HUD certified nonprofit organizations that provide the required homebuyer counseling to these individuals and families. Prior year resources are being used in 2014 so we anticipate 2014 funds being used into 2015.
7	Project Name	Rental Rehabilitation Program
	Target Area	City-wide
	Goals Supported	Rental Housing Development

	Needs Addressed	No Priority Needs
	Funding	CDBG: \$100,000 HOME: \$580,277
	Description	The purpose of the Rental Rehabilitation Program is to increase the number of renovated rental housing units available to low-income families. Owners of housing units may receive up to 50% of the cost of rehabilitating a housing unit in the form of a deferred, forgivable loan as long as the housing unit remains available to low-income families for at least five years.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	The number of families assisted will depend on the project selected for funding.
	Location Description	City-wide
	Planned Activities	The RRP funds will be used to rehabilitate existing rental housing stock. The actual projects are selected throughout the year based on applications submitted and project underwriting and evaluation. The projects are 10 units or more and are likely multi-year projects.
8	Project Name	Code Enforcement Relocation
	Target Area	City-wide
	Goals Supported	Renters Supportive Services
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$50,000
	Description	This project allows the City of Cincinnati to pay the first month's rent or security deposit for persons moving to decent, safe and sanitary housing who have been displaced by code enforcement and/or the hazards of lead paint. Staff take applications from low to moderate income persons and provide vacancy lists and management company lists to clients. Qualified participants receive up to \$650 for rental assistance and moving costs.

	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	About 40 families will be assisted.
	Location Description	City-wide
	Planned Activities	Eligible residents are selected on a first-come, first-serve basis until funds are expended. 2014 funds will likely be used into 2015.
9	Project Name	Tenant Representation
	Target Area	City-wide
	Goals Supported	Renters Supportive Services
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$147,000
	Description	The Tenant Representation Project (TRP) administered by the Legal Aid Society provides legal representation for low and moderate-income tenants in the City of Cincinnati. The TRP prevents homelessness by stopping unlawful evictions, corrects illegal lockouts and utility shutoffs, and requires landlords to complete repairs to make rental units decent, safe, and sanitary. The project also prevents retaliation against tenants who ask the City Building and Health Departments to inspect for code violations.
	Target Date	8/31/2015
	Estimate the number and type of families that will benefit from the proposed activities	About 375 families will be assisted.
	Location Description	City-wide

	Planned Activities	Eligible residents are selected on a first-come, first-serve basis until funding is expended. This program contract runs from September 2014 to August 2015.
10	Project Name	Section 8 Mobility Program
	Target Area	City-wide
	Goals Supported	Renters Supportive Services
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$40,375
	Description	The Section 8 Mobility Program (formerly Section 8 Tenant Counseling and Placement) provides placement services to Section 8 voucher holders to assist them in securing affordable housing in low poverty neighborhoods. In addition to the services mentioned above, Housing Opportunities Made Equal (H.O.M.E.) also provides an outreach component to landlords.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	About 35 families will be assisted.
	Location Description	City-wide
	Planned Activities	Eligible residents are selected on a first-come, first-serve basis until funding is expended.
11	Project Name	Tenant Based Rental Assistance
	Target Area	City-wide
	Goals Supported	Renters Supportive Services
	Needs Addressed	No Priority Needs
	Funding	HOME: \$400,000

	Description	The Hamilton County Department of Community Development will operate and provide Tenant Based Rental Assistance (TBRA) to eligible households within the City of Cincinnati. The TBRA will cover a portion of the household rent payment for a minimum of 85 client households over a 12-month period. Client households have one or more disabled members.
	Target Date	9/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	About 85 families will be assisted. All families will have at least one member with a disability.
	Location Description	City-wide
	Planned Activities	Due to decreasing HOME funds, this program supports only existing TBRA recipients. Program contract is October 2014 to September 2015.
12	Project Name	Fair Housing Services
	Target Area	City-wide
	Goals Supported	Promote Fair Housing
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$167,060
	Description	The City contracts with Housing Opportunities Made Equal (H.O.M.E.) to promote equal housing opportunities for all home seekers regardless of race, sex, color, nationality, religion, handicap, or familial status and to reduce unlawful discrimination in housing and increase integration throughout Cincinnati's neighborhoods. The program does complaint intake, investigation, counseling, and files legal complaints against persons, firms, or organizations suspected of discrimination in housing.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1,000 families will be assisted. These families will be inquiring about fair housing laws and bringing forward possible violations. HOME will also work with landlords and realtors as well.

	Location Description	City-wide.
	Planned Activities	Eligible residents and landlords receive assistance on a first-come, first-serve basis until funding is expended.
13	Project Name	Neighborhood Business District Improvement Program
	Target Area	City-wide
	Goals Supported	Promote Commercial and Industrial Development
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$920,000
	Description	The Neighborhood Business District Improvement program enhances the business environment in the City's NBDs by constructing streetscape public improvements, infrastructure improvements, property acquisition, or other development activities.
	Target Date	12/31/2017
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 60 businesses in the selected NBD's will be assisted.
	Location Description	City-wide
	Planned Activities	The Cincinnati Neighborhood Business Districts United (CNBDU) manages a rigorous review process in selecting which business districts receive assistance through this program. Assistance can be on a wide continuum from business district planning and design, to facade improvement programs, to implementation of multi-phase construction and streetscape projects.
14	Project Name	Strategic Program for Urban Redevelopment
	Target Area	City-wide
	Goals Supported	Industrial Site Redevelopment
	Needs Addressed	No Priority Needs

	Funding	CDBG: \$555,000
	Description	The Strategic Program for Urban Redevelopment/GO Cincinnati Program facilitates the redevelopment of abandoned, vacant, or underutilized industrial and commercial sites where expansion or redevelopment may be complicated by environmental contamination. The funds will be used to acquire property, remediate contamination, construct public improvements, and perform activities to facilitate redevelopment of brownfield sites.
	Target Date	12/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable.
	Location Description	TBD
	Planned Activities	The interdepartmental SPUR/Go Cincinnati team selects projects based on established criteria for CDBG investment.
15	Project Name	Small Business Services and Technical Assistance
	Target Area	City-wide
	Goals Supported	Promote Business Development Opportunities
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$126,000
	Description	The Small Business Services and Technical Assistance Program supports a system of accessible technical assistance to meet the start-up and growth needs of micro-enterprises and small businesses. Programs and services provided include capacity development, business education and coaching, entrepreneurial training, incubation and technical assistance in the form of loan packaging, accounting services, legal services, appraisals, environmental assessments, and inventory control audits.
	Target Date	6/30/2015

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 75 people will be assisted.
	Location Description	City-wide
	Planned Activities	Eligible business owners and entrepreneurs are selected on a first-come, first-serve basis until funding is expended.
16	Project Name	Small Business Loan Fund
	Target Area	City-wide
	Goals Supported	Promote Business Development Opportunities
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$90,000
	Description	The Cincinnati Small Business Loan Fund (CSBLF) is a revolving loan program that is used to fill financing gaps for small to mid-sized businesses located in the City of Cincinnati. These businesses must create or retain jobs for City residents, or provide benefit to residents of low and moderate-income neighborhoods.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 4 businesses will receive loans
	Location Description	City-wide
	Planned Activities	Eligible businesses are selected based on selected program criteria on a first-come, first-serve basis until funding is expended.
17	Project Name	Findlay Market - Nonprofit Capacity Building
	Target Area	EMPOWERMENT ZONE
	Goals Supported	Job Training Services

	Needs Addressed	No Priority Needs
	Funding	CDBG: \$168,000
	Description	The Corporation for Findlay Market has entered into a management agreement with the City of Cincinnati to assume responsibility for management and leasing of Findlay Market facilities. Project subsidy will be used to recruit new small businesses to the Market, develop existing businesses, and support daily operations of the facilities.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Over-the-Rhine
	Planned Activities	The Corporation will create a new job training program for hard to employ persons to implement a Safe and Clean program at the Market.
18	Project Name	Earned Income Tax Credit and Financial Literacy
	Target Area	City-wide
	Goals Supported	Promote Business Development Opportunities
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$1,700
	Description	The purpose of the Earned Income Tax Credit Outreach and Financial Literacy Program is to improve the quality of life for low-income taxpayers who live in Cincinnati by expanding their awareness of the Federal Earned Income Tax Credit, by providing increased access to free tax preparation and filing services, and by facilitating programs to enhance their financial literacy. Funding is used to pay for printed materials advertising the program clinics.
	Target Date	12/31/2014

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 750 people will be assisted.
	Location Description	City-wide
	Planned Activities	Free tax preparation is provided at selected sites throughout the City. No eligible resident is turned away from receiving this service. Program funds provide for marketing materials only for this volunteer-based program.
19	Project Name	Financial and Credit Union Services
	Target Area	City-wide
	Goals Supported	Promote Business Development Opportunities
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$55,000
	Description	The Financial and Credit Union Services program provides operating support to SmartMoney Community Services. SmartMoney assists low-income residents, primarily in the West End and Over-the-Rhine neighborhoods, by providing a full range of banking services. SmartMoney also provides free tax preparation through the SmartTax program. The Economic Education portion of this program includes SmartDollars & Sense, a comprehensive workshop covering all topics in basic money management. SmartChange Financial Counseling is a one-on-one counseling program structured to provide individual sessions to participants who are having problems balancing their income with their expenses. SmartChange participants have an opportunity to review their credit reports, and if needed, arrange repayment plans with creditors.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 150 families will be assisted

	Location Description	City-wide
	Planned Activities	Eligible residents will be selected on a first-come, first-serve basis until funds are expended.
20	Project Name	Neighborhood Capacity and Technical Assistance
	Target Area	City-wide
	Goals Supported	Promote Business Development Opportunities
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$320,000 HOME: \$110,000
	Description	The Neighborhood Capacity Building and Technical Assistance Program is designed to build and strengthen the capacity of Community Development Corporations (CDCs) through three principal activities: 1. Supporting neighborhood-based CDCs by providing operating funds; 2. Providing technical assistance and training to CDCs; and 3. Providing administrative oversight of the programs.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	The number for families served will depend on projects executed by the CDCs.
	Location Description	City-wide
	Planned Activities	To be determined.
21	Project Name	Blueprint for Success
	Target Area	City-wide
	Goals Supported	Job Training Services
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$82,874

	Description	The Blueprint for Success Program is based on the Youth Build model, to assist ex-offenders and at-risk young adults ages 16-30 in obtaining their high school diploma or GED as well as marketable construction skills. Participants will be trained in all aspects of residential construction through the rehabilitation. Funding for housing repairs is provided in the CARE program.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 29 residents will receive training.
	Location Description	City-wide
	Planned Activities	Eligible residents are selected based on program criteria on a first-come, first-serve basis until funding is expended.
22	Project Name	Summer Youth Employment Program
	Target Area	City-wide
	Goals Supported	Job Training Services
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$960,000
	Description	The Summer Youth Employment Program trains youth in the areas of work place etiquette and basic work skills by utilizing workshops, presentations, and on the job experiences. The program provides youth with opportunities to explore their interests and career options in public, nonprofit and private organizations.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 350 youth will receive employment.
	Location Description	City-wide

	Planned Activities	Eligible residents are selected based on completed applications and interviews on a first-come, first-serve basis until all spots are filled.
23	Project Name	Concentrated Code Enforcement
	Target Area	City-wide
	Goals Supported	Slum and Blight Elimination
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$575,000
	Description	Inspections of homes and businesses are conducted in targeted areas and areas in transition. Corrections achieved through Concentrated Code Enforcement involve repairing porches, windows, and siding; painting; and removal of dilapidated garages, fences and sheds, junk cars and weeds. Owners receiving orders are informed of funding availability to correct violations, including the Housing Repair Services and CARE programs. This program provides for complaint driven inspections of unsafe conditions in targeted areas as well.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 3880 buildings will be inspected.
	Location Description	City-wide
24	Planned Activities	The specific areas for concentrated code enforcement are determined by the Neighborhood Enhancement Program. 2014 neighborhoods have not yet been selected.
	Project Name	Hazard Abatement Program
	Target Area	City-wide
	Goals Supported	Slum and Blight Elimination
	Needs Addressed	No Priority Needs

	Funding	CDBG: \$1,150,000
	Description	The mission of the Hazard Abatement Program is the preservation of the public health, safety, and welfare through demolition and barricading or repair of abandoned buildings. The Barricade Program was initiated in 1993 for the purpose of securing vacant abandoned buildings against entry by trespassers. Under the Hazard Abatement Program, condemned buildings citywide are demolished or repaired after normal code enforcement activities have been exhausted.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Specific buildings to be barricaded and/or demolished are selected based on code enforcement, orders written, noncompliance with orders written and overall condition of the properties.
25	Project Name	Mill Creek Greenway Restoration
	Target Area	City-wide
	Goals Supported	Slum and Blight Elimination
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$78,000
	Description	The Mill Creek Greenway Restoration Program creates a greenway system within the riverine-riparian corridor of the Mill Creek. This project provides planning and coordination services for greenway projects, volunteer recruitment for cleanup, and environment enhancing projects. The project's goals are to create innovative and sustainable greenway trails, parks, and other amenities within the riparian corridor of the Mill Creek and help revitalize neighborhoods located near the river's floodplain.
	Target Date	12/31/2014

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 42,000 residents will benefit from this program.
	Location Description	Millcreek Valley areas
	Planned Activities	The program provides matching funds to the Mill Creek Greenway Restoration project to leverage additional investment. Specific plans for 2014 are still underway.
26	Project Name	Lead Hazard Testing Program
	Target Area	City-wide
	Goals Supported	Slum and Blight Elimination
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$495,000
	Description	The Lead Hazard Testing Program provides funding for lead inspections of residences occupied by children who have been identified as having an elevated blood lead level (EBL). The State of Ohio has lowered the blood lead criteria level, which requires intervention to 15 ug/dl of blood. In addition, the program responds to complaints from households where a child may be exposed to lead but has not yet been diagnosed. The Health Department uses another HUD Lead Grant to remediate lead issues. Additional services provided with this program are education and outreach, equipment rental and follow up nursing care for affected families.
	Target Date	6/30/2014
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 100 children will be tested for EBL. Additional families will benefit from the LEAD grant.
	Location Description	City-wide.

	Planned Activities	This program assists children and families in need as defined by complaints about potential lead poisoning and test results from potential clients. The Health Department attends health fairs and educational events throughout the year to provide outreach and training. Equipment rental is advertised to property owners throughout the year as well.
27	Project Name	Future Blooms
	Target Area	City-wide
	Goals Supported	Slum and Blight Elimination
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$185,000
	Description	The Future Blooms Program focuses on enhancing the aesthetics' of targeted areas by painting windows and doors on boarded up buildings, and improving vacant lots by growing grass, adding trees where appropriate, and using a fence to define the space as a "Future Blooms" project. These properties are highly visible and this program encourages redevelopment in the surrounding areas.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 8,000 people will benefit
	Location Description	Throughout Over-the-Rhine
28	Planned Activities	Specific buildings to be enhanced are selected throughout the year and are usually chosen next to buildings that are undergoing redevelopment.
	Project Name	Historic Stabilization of Structures
	Target Area	City-wide
	Goals Supported	Slum and Blight Elimination
	Needs Addressed	No Priority Needs

	Funding	CDBG: \$210,000
	Description	The Historic Structures Stabilization Program would abate public nuisance conditions and stabilize historic properties. Under Ohio Law if there is a historic building that is deemed a public nuisance, the City has the right to take action to abate the public nuisance conditions without taking ownership of the property. The City would use this right under the law to maintain the public health, safety, and welfare while at the same time preserve the historic structures for potential future rehabilitation.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City-wide
	Planned Activities	Specific projects for 2014 have not been selected yet.
29	Project Name	Drug Elimination Program
	Target Area	City-wide
	Goals Supported	Citizen Safety
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$72,250
	Description	The Drug Elimination Program provides funding for increased law enforcement and crime prevention education in Over-the-Rhine. These officers engage in public education and drug enforcement activities, including investigation, surveillance, and arrest of drug traffickers. It is anticipated that these enforcement activities will also lead to the arrests of criminals for offenses other than and/or related to drug trafficking and abuse.
	Target Date	12/31/2014

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 7,000 residents will benefit
	Location Description	Over-the-Rhine
	Planned Activities	Community outreach and drug elimination services are provided throughout Over-the-Rhine based on police data and chamber direction.
30	Project Name	Homeless to Homes Permanent Supportive Housing
	Target Area	City-wide
	Goals Supported	Homeless Shelters & Other Homeless Housing Support
	Needs Addressed	No Priority Needs
	Funding	HOME: \$169,007
	Description	The Homeless to Homes Permanent Supportive Housing Program will provide partial financing for the construction or rehabilitation of new transitional housing units and new permanent supportive housing units.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 10 families will benefit
	Location Description	TBD
	Planned Activities	This program will provide funding for permanent supportive housing projects for individuals and families either coming from homelessness or those facing immediate homelessness.
31	Project Name	Homeless Shelters & Homelessness Prevention
	Target Area	City-wide

	Goals Supported	Homeless Shelters & Other Homeless Housing Support Homeless Prevention
	Needs Addressed	No Priority Needs
	Funding	ESG: \$847,281
	Description	This project funds the operation of emergency shelter facilities as well as essential services for the residents. Additionally, this project includes the funding of a shelter diversion program that will serve individuals and families at risk of homelessness by providing Housing Relocation and Stabilization Services as well as Tenant Based Rental Assistance. Finally, this project includes administrative funding for the HESG program.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 4,500 families will benefit.
	Location Description	City-wide
	Planned Activities	This program provides funding for all ESG activities including Homeless Shelters & Other Homeless Housing; Homelessness Prevention; and Administration. The Strategies to End Homelessness (STEH) administers all ESG programs and subrecipient contracts.
32	Project Name	Caracole House
	Target Area	City-wide
	Goals Supported	Operating Support for HIV/AIDS Housing Facilities Supportive Services for Persons with HIV/AIDS Housing Assistance for Persons with HIV/AIDS
	Needs Addressed	No Priority Needs
	Funding	HOPWA: \$497,074

	Description	Since 1993, Caracole has been the City's provider of Shelter Plus Care tenant-based rental assistance for homeless persons with HIV/AIDS through HUD's Continuum of Care funding process. The Shelter Plus Care program will continue to provide subsidies for homeless individuals and families with HIV/AIDS and HOPWA funds will, in part, match the value of those subsidies with outreach services, case management, supportive services for clients, additional tenant based rental assistance, and housing placement services. Caracole services include TBRA, STRMU, housing placement, supportive services and operating support for housing facilities.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 200 households will be assisted.
	Location Description	City-wide
	Planned Activities	Caracole services include TBRA, STRMU, housing placement, supportive services and operating support for housing facilities. Existing clients are given priorities in receiving services and new clients are added depending on available funding.
33	Project Name	Center for Respite Care
	Target Area	AVONDALE NRSA
	Goals Supported	Supportive Services for Persons with HIV/AIDS
	Needs Addressed	No Priority Needs
	Funding	HOPWA: \$22,182

	Description	The Cincinnati Center for Respite Care, which has 15 beds for emergency shelter individuals, provides emergency shelter for homeless persons who require medical care not available within a regular shelter bed. Services include 24-hour residential, recuperative adult care services for homeless men and women clients. Clients are referred from shelters through the Health Resource Center clinic or the Medical Van, from hospital emergency rooms, and from inpatient units of various hospitals in Greater Cincinnati. About 14% of Center for Respite Care's population is HIV positive.
	Target Date	6/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	The number of patients varies depending on need and averages 10 to 20 patients per year.
	Location Description	CRC is located in a nursing home in Avondale.
	Planned Activities	CRC provides medical services for patients who are homeless; a portion of these patients have HIV/AIDS. CRC is reimbursed for those clients that are HIV positive with HOPWA funds.
34	Project Name	Northern Kentucky Independent District Health
	Target Area	City-wide
	Goals Supported	Housing Assistance for Persons with HIV/AIDS
	Needs Addressed	No Priority Needs
	Funding	HOPWA: \$128,197
	Description	These short-term rent/mortgage/utility funds assist individuals and families with HIV/AIDS throughout Northern Kentucky in remaining in independent living situations and maintaining their existing housing. This funding provides for assistance in locating and securing housing when persons with HIV/AIDS are homeless. Due to the absence of an application from any Indiana-based HOPWA provider, the Northern Kentucky District Health Department receives funds designated specifically for providing assistance to eligible clients living within the Indiana counties of the Greater Cincinnati EMSA.
	Target Date	6/30/2015

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 170 families are assisted with STRMU depending on the financial need and length of assistance.
	Location Description	The EMSA for HOPWA includes 15 counties in Ohio, Northern Kentucky and Indiana. This program funds activities in all Northern Kentucky and Indiana counties.
	Planned Activities	Existing clients are given priorities in receiving STRMU and new clients are added depending on available funding.
35	Project Name	Compliance Assistance Repairs for the Elderly (CARE)
	Target Area	City-wide
	Goals Supported	Homeownership Housing Development
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$131,245
	Description	The CARE program provides forgivable loans and grants to low income, elderly homeowners to correct code violations issued pursuant to a Neighborhood Enhancement Program, "house to house" exterior property condition inspection and code enforcement action. Owner occupants would receive financial assistance in correcting common exterior code violations.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 10 families will benefit.
	Location Description	TBD
	Planned Activities	Eligible homeowners will apply for assistance and will receive services on a first-come, first-serve basis until all funds are expended.
36	Project Name	Administration

Target Area	City-wide
Goals Supported	Homeownership Housing Development Rental Housing Development Renters Supportive Services Homeowner Supportive Services Promote Fair Housing Promote Commercial and Industrial Development Industrial Site Redevelopment Promote Business Development Opportunities Job Training Services Slum and Blight Elimination Citizen Safety Homeless Shelters & Other Homeless Housing Support Homeless Prevention Operating Support for HIV/AIDS Housing Facilities Supportive Services for Persons with HIV/AIDS Housing Assistance for Persons with HIV/AIDS
Needs Addressed	No Priority Needs
Funding	CDBG: \$2,471,998 HOPWA: \$20,179 HOME: \$224,904
Description	This project covers administration costs for three of four grant programs - CDBG, HOME and HOPWA programs. HESG admin is listed separately.
Target Date	12/31/2014
Estimate the number and type of families that will benefit from the proposed activities	All data will be included in program activities.

	Location Description	City-wide
	Planned Activities	This supports operating costs for three of the four entitlement grants. ESG administration is included in the ESG activities as required by IDIS.
37	Project Name	Findlay Market - Urban Gardens
	Target Area	EMPOWERMENT ZONE
	Goals Supported	Promote Business Development Opportunities
	Needs Addressed	No Priority Needs
	Funding	CDBG: \$28,000
	Description	The Corporation will fund urban gardens in the Over-the-Rhine neighborhood. Volunteers and neighborhood youth will sell the produce at Findlay Market which will address the need for fresh produce in this urban food desert. Proceeds will support the gardens and promote business development.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 7,000 residents will benefit.
	Location Description	Over-the-Rhine
	Planned Activities	
38	Project Name	Section 108 Loan Debt Service
	Target Area	EMPOWERMENT ZONE City-wide
	Goals Supported	Rental Housing Development Promote Business Development Opportunities Homeless Shelters & Other Homeless Housing Support
	Needs Addressed	No Priority Needs

	Funding	CDBG: \$984,835
	Description	This program will cover current and future debt service for projects funded with Section 108 loans.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 140 families will be assisted.
	Location Description	Section 108 loan debt service is being paid for prior year loans and 2014 loans, including Avondale Town Center in Avondale, Laurel Homes in the West End and Broadway Square in Pendleton. Additional loans may be initiated for the relocation of the Drop Inn Center in Queensgate and the Women's Shelter in Mt. Auburn. Anna Louise Inn in Mt. Auburn is projected to close in January 2015.
	Planned Activities	Current Section 108 loan debt service is being paid for Avondale Towne Center and Laurel Homes. The following projects will be financed with Section 108 loan debt in 2014: YWCA Women's Shelter Relocation, Anna Louise Inn Relocation, Drop Inn Center Relocation and Broadway Square housing development project.

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

Generally the 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 EMSA which covers 15 counties in the area. Although the three 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 allocates funding based on statistical information on number of cases of HIV/AIDS by county and state to ensure that each geographic area is receiving funding commensurate with need.

Geographic Distribution

Target Area	Percentage of Funds
LAUREL HOMES AND LINCOLN COURT	
EMPOWERMENT ZONE	12
WALNUT HILLS NRSA	
COLLEGE HILL NRSA	
AVONDALE NRSA	
City-wide	88

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

As stated above, in general the HUD programs are not allocated to specific areas and serve the entire population of the City. This is due to program design and general need throughout most city neighborhoods. The City's Neighborhood Enhancement Program (NEP) provides concentrated City services for a 90-day time period to address blight, crime and other nuisances, and its goal is to serve as a kick-start to long-term neighborhood revitalization and reinvestment. New neighborhoods are chosen each year. Funding for the Concentrated Code Enforcement program are utilized in the NEP. Two CDBG programs are concentrated in the Over-the-Rhine Neighborhood, which is part of the Empowerment Zone: Drug Elimination and Future Blooms. Additionally, the City provides CDBG funds to the Corporation for Findlay Market to manage Findlay Market which is located in Over-the-Rhine, but the market serves all city residents.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Affordable housing activities undertaken by the City will address the needs of homeless, non-homeless, and special-needs households. Various programs will provide these households with rental assistance, new units or rehabilitated units. No acquisition is planned. The goals for affordable housing and further details on the projects included are provided below.

One Year Goals for the Number of Households to be Supported	
Homeless	3,385
Non-Homeless	19
Special-Needs	460
Total	3,864

Table 8 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	495
The Production of New Units	10
Rehab of Existing Units	935
Acquisition of Existing Units	0
Total	1,440

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

Discussion

The City will provide housing assistance through all four grant programs - CDBG, HOME, ESG, and HOPWA. The Strategic Housing Initiatives Program and Single Family Homeownership Program will provide housing assistance in the form of new units to non-homeless beneficiaries to 19 households. The ESG Shelters and Homeless Prevention project (3375 households) will provide shelter and housing and the Homeless to Homes - Permanent Supportive Housing project will provide new units (10 households) to 3,385 homeless households. Rental assistance will be provided to 495 non-homeless and special-needs households through the following programs: HOME Tenant Based Rental Assistance-TBRA (68 households), ESG Homelessness Prevention (150 households), HOPWA Short-term Mortgage/Rent and Utility Assistance-STRMU (250 households), and HOPWA Tenant Based Rental Assistance-TBRA (27 households). The Housing Repair Services (935 households), Compliance Assistance Repairs for the Elderly-CARE (10 households) and the Rental Rehab (50 households) projects will provide 995 non-homeless households with rehabilitated units. The City does not plan to acquire any existing units.

AP-60 Public Housing – 91.220(h)

Introduction

In FY2011, the Cincinnati Metropolitan Housing Authority (CMHA) assisted approximately 11,200 families and a total of 29,000 individuals through the Housing Choice Voucher (HCV) Section 8 Program. The FY2011 grant for the HCV program was \$72.5 million. In FY2011, CMHA also assisted 9,900 individuals in 5,200 public housing units with a budget of approximately \$60 million which includes the operating subsidy (\$38.5 million) and capital subsidies (\$11.5 million) as well as rental income (\$10 million).

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

In 2012, CMHA hired a new executive director who set several goals to transform CMHA into a Hamilton County asset. During the past year, CMHA has worked to increase efficiency and open communication throughout Cincinnati and Hamilton County. In the most recent CMHA newsletter, these efforts are summarized: "During several recent community meetings, we've heard neighbors describe CMHA as 'engaged,' 'valuable' and 'positive' for the area. In fact, at a recent coffee and conversation in Price Hill, resident Nancy Sullivan told us: 'It's exciting to hear what's in store and witness the transformation' at CMHA." CMHA is also striving for excellence in all agency operations with initiatives such as the Good Neighbor Agreement between CMHA and local community organizations. CMHA is also implementing employee Six Sigma training to further open communication and operational efficiency.

The City of Cincinnati performs the environmental reviews for CMHA including the Request for Release of Funds for the agency.

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

The City's Down Payment Assistance Program is available to all income-qualified residents, including public housing residents, to encourage homeownership. In addition, the Financial and Credit Union Services project assists low-income individuals, including public housing residents, in obtaining banking services. This project also funds workshops on financial literacy, credit counseling and mortgage savings accounts - all of which are key elements in the path to homeownership.

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 not designated as troubled.

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

Introduction

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

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

The Homeless Outreach Group is a group of outreach providers who meet monthly to discuss best practices. A representative from the Cincinnati Police Department maintains a seat in that group. Currently there are four agencies, (five programs), providing outreach services to those who are living on the street:

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

Plans for the coming year for targeting services to the unsheltered population include the establishment of a new permanent housing program for those individuals who are unsheltered due to their past criminal background. Such individuals often have felony records that include charges that preclude emergency shelters from housing them, such as sexual related offenses.

Addressing the emergency shelter and transitional housing needs of homeless persons

Cincinnati is moving forward with recommendations and strategies from the Homeless to Homes plan related to ending chronic homelessness, including the reconfiguration of the emergency shelter beds for single individuals into smaller bed configurations that provide a higher level of services to residents; provide more intensive case management services that support individual development; develop and follow through with case plans that move them quickly from homelessness into housing; provide comprehensive daytime services. The Homeless to Homes plan recommends maintaining the existing beds in the Emergency Shelters serving single men and women, but reconfiguring them to better serve the homeless population. Many of the recommendations have already been completed, and the following are still being implemented:

- a. The Emergency Shelter for Single Women should be separated from the Men's Shelter. Currently, women are sheltered at the Drop Inn Center with the men. While they are housed in a separate area of the shelter, they do enter through the same entrance and share the same common areas. The YWCA has been identified as the agency that will build and operate a new Emergency Shelter for Single Women. The YWCA is working with Strategies to End Homelessness and 3CDC to develop this facility. The site has been identified and purchased with demolition completed. The site is shovel ready and awaiting confirmation on final gap capital funding before breaking ground. The YWCA anticipates opening in 2014.
- b. City Gospel Mission has secured a new site to increase the number of faith-based beds, as well as daytime and case management services. They have secured a building permit and a contractor and are waiting final funding before breaking ground on the new facility. Once opened and operating, they will have 76 beds for homeless men.

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

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 local homeless services system is coordinating its efforts toward assisting all homeless and at risk people by simultaneously pursuing three strategies: 1) Homelessness Prevention/Shelter Diversion, 2) Improving services to assist people who are already homeless, 3) Providing housing resources so that households have options available to them to exit homelessness.

Homelessness Prevention/Shelter Diversion: ESG funds are being used to divert households at imminent risk of entering shelter back into housing and services. The Shelter Diversion program is being run in partnership between the City of Cincinnati, Hamilton County, the United Way of Greater Cincinnati and 4 of its Emergency Assistance agencies, and Strategies to End Homelessness, the CoC Lead Agency. One of the risk factors considered for inclusion in this program is a prior history of homelessness.

Improved services: the recommendations & improvements for emergency shelter services that are being implemented as a part of the Homeless to Homes initiative (described above) will significantly raise the level of daytime and case management services being offered within the shelter system.

Housing: Rapid Re-Housing (RRH) is a nationally recognized best practice for quickly ending episodes of homelessness in a cost efficient and effective way. RRH has become a high priority in our community with twelve programs at seven agencies that have transitioned this year from transitional housing to RRH program models (Center for Respite Care, Ohio Valley Goodwill, Bethany House Services, Freestore Foodbank, Lighthouse Youth Services, Talbert House Services, The Salvation Army, and YWCA).

The implementation of the Continuum of Care Interim rule calls for the CoC to develop and implement policies and procedures for prioritizing households who are most in need of transitional housing, RRH or permanent supportive housing. The CoC workgroups are currently meeting to develop these policies and procedures and will be implemented in our community in 2013. The CoC work groups are also in the process of developing a Coordinated Assessment System, unique to our community, to ensure that homeless individuals and families are referred to the program that best meets their needs and can quickly become stably housed.

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

In addition, Talbert House and Goodwill Industries have been awarded a Supportive Services for Veteran Families Veteran Affairs (SSVF VA) grants to implement a program which is geared at preventing homelessness for veterans and their families as well as rapidly transitioning those experiencing homelessness back into permanent housing. This program along with the ESG-funded Shelter Diversion Program will work to prevent families and individuals at risk of homelessness from becoming literally homeless.

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.

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

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

Ohio requires that if a child is 16 years or older and is likely to remain in care the agency must have a written independent living plan to achieve self-sufficiency developed within 30 days of the completion of an assessment. The plan should be based upon the assessment and include input from the youth, the case manager, the caregiver, and significant others. The independent living plan should be reviewed at least every 90 days until the agency's custody is terminated. A review of the state protocol at the local level (Cincinnati/Hamilton County) through the Hamilton County Department of Job and Family Service (HCJFS) indicates that assessments are completed on all foster teens at age 16 or as they come into custody, using the Daniel Memorial Assessing and Contracting with Youth tool which provides for the assessments and the follow-up planning. The HCJFS After Care Worker is responsible for devising an individual plan for each emancipated youth, including housing plans. HCJFS is the PCSA responsible for the implementation of the policy at the local level.

Health Care The Ohio General Assembly enacted laws governing the transfer and discharge of residents in nursing homes (NHs) and residential care facilities (RCFs) [Ohio Revised Code (ORC) section 3721.16], adult care facilities (ACFs) [ORC section 3722.14], and community alternative homes

(CAH)[ORC section 3724.10]. The Ohio Department of Health (ODH) promulgated Chapter 3701-16 of the Ohio Administrative Code (OAC) that further expounds on the transfer and discharge rights of NH and RCF residents and OAC rules 3701-20-24 (ACF) and 3701-16, 23 (CAH). ODH ensures that these provider types follow the appropriate regulations regarding transfer, discharge, or both, by reviewing documentation that the facility has initiated discharge planning and that alternatives have been explored and exhausted prior to discharge.

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

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

Discussion

Mental Health Care It is the policy of Ohio Department of Mental Health (ODMH) that homeless shelters are not appropriate living arrangements for persons with mental illness. Patients being discharged from ODMH Behavioral Health Organizations/Hospitals (BHO) are not to be discharged to a shelter or to the street. Community Support Network (CSN) programs are required to have appropriate emergency housing plans in place in the event their clients undergo unexpected residential change. These entities, in conjunction with the responsible or contracting Board or agency, must exhaust all reasonable efforts to locate suitable housing options for patients being discharged. Patients in ODMH BHOs shall not be discharged to homeless shelters and clients in an ODMH CSN program shall not be relocated from community housing options to homeless shelters unless the responsible board or contract agency has been involved in the decision making process and it is the expressed wish of the affected person and other placement options have been offered to the affected person and refused. When a discharge or relocation to a homeless shelter occurs under these guidelines, the reasons shall be documented in the person's chart and reviewed via the BHOs quality improvement process. Persons may not be discharged or relocated to homeless shelters for the convenience of staff, as a punitive measure, or for expediency. ODMH BHO policies shall be consistent with this directive.

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

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

Shelter Diversion funds can be used for deposits, rental payments, rent arrears, utility payments and utility arrears to assist a person in finding and maintaining permanent housing. A person will develop a case plan that will address their stabilization needs, including housing and income. All of the agencies participating in Shelter Diversion use the HMIS system (VESTA). Callers are screened at Central Access Point (CAP) and referrals are made through VESTA. All client data is maintained in VESTA along with financial requests. A sub-grant has been arranged with Legal Aid of Greater Cincinnati to provide legal assistance. City and County ESG funds have been blended with The United Way funds to implement this program.

Additionally, a Veteran's Administration (VA) funded-homelessness prevention program operated by Goodwill started on October 1, 2012. Beginning October 1, 2013, Talbert House will also have VA funding. Both programs serve veterans and their families who are at-risk of becoming homeless with case management and financial services. Veterans and their families are referred by CAP to Goodwill or Talbert House for assistance.

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	250
Tenant-based rental assistance	27
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	50
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	25
Total	352

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

Introduction

Several Cincinnati policies may have the unintended consequence of increasing the cost of developing affordable housing units. These policies are consistent with the basic federal statute goal of creating a suitable living environment by reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for lower income persons and revitalization of deteriorating neighborhoods. The Impaction Ordinance (346-2001), passed by City Council in 2001, requires, in the budgeting of CDBG and HOME Investment Partnership program funds and in the approval of low income tax credit projects, opposition of the construction of new publicly-assisted low-income rental units unless the construction reduces the concentration of poverty or are intended for occupancy by the elderly. The Housing Advisory Council (HAC) recommendations, developed in 2004, includes an objective of increasing the number of affordable rental units in areas where few similar units exist with the rationale that increasing affordable rental units in such communities will give low to moderate-income families additional housing choices and reduce concentration pressures on communities with a disproportionate share of affordable housing. The Cincinnati Metropolitan Housing Authority (CMHA) is also looking for opportunities to purchase properties in low-poverty neighborhoods that currently have few assisted units. While these policies are consistent with the goal of creating a more suitable living environment for lower income families and individuals, creation of housing units in higher income communities will cost more to develop due to land prices and will likely take longer to develop due to community opposition or hesitancy to house lower income individuals and families.

The City of Cincinnati and Hamilton County jointly requested that Housing Opportunities Made Equal (HOME), a Fair Housing Agency, conduct an Analysis of Impediments to Fair Housing (AI) update for the City and County jurisdictions. The AI was completed in May 2009, and in the AI, 18 recommendations were developed to respond to the issues of 1) NIMBYism based on stereotypes, 2) Improving choice in the Housing Choice Voucher Program, 3) Predatory Lending and Lending Discrimination, 4) Discrimination Against People with Disabilities, 5) a Lack of Accessible Housing, 6) Discrimination Against Families with Children, and 7) Sexual Harassment. Following the recommendations, the City and County began a series of meetings with a working group comprised of staff from the Department of City Planning and Buildings, the Department of Trade and Development, the Hamilton County Department of Community Development, CMHA and fair housing advocates to address the report and its recommendations. A Fair Housing Committee was formed in early 2010 and continues to meet on a quarterly basis. The committee works to further develop the recommendations, and advise the City and County on ways to address the recommendations of the Analysis to Impediments.

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

Please see Action Plan Attachment 3 on Fair Housing Activities.

Discussion

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

AP-85 Other Actions – 91.220(k)

Introduction

Actions planned to address obstacles to meeting underserved needs

Housing and Other Community Development Underserved Needs

As this plan will demonstrate, the need for housing, community development, and quality of life services in order 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, a suitable living environment, and expanded economic opportunities are met for all Cincinnati residents and businesses, especially those with the most need.

Homeless Underserved Needs

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

Actions planned to foster and maintain affordable housing

The City plans to accomplish affordable housing goals and objectives through housing projects such as the Strategic Housing Initiatives Program, the Rental Rehabilitation Program, the Single Family Homeownership Development with Cincinnati Habitat for Humanity, 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. Performance measures and funding levels for these programs are included in AP-20 Annual Goals and Objectives, AP-38 Project Summary, and AP-35 Projects.

Actions planned to reduce lead-based paint hazards

In December 2010, the Cincinnati Health Department (CHD) Childhood Lead Poisoning Prevention Program (CLPPP) was awarded a three-year \$4.5 million HUD Lead Hazard Reduction Demonstration Grant. The grant includes a goal to perform lead hazard control work in a total of 325 income-eligible owner-occupied and rental housing units located throughout the City where a child under the age of six resides or frequents. CHD CLPPP was awarded a \$3 million dollar HUD Lead Hazard Control Grant received in 2007 that was completed in 2010. The initial commitment was to make 210 units, single family and multi-family, lead safe. The grant concluded with 286 homes made lead safe, exceeding the expected to target 76 units. While the primary focus of CHD CLPPP's lead grants are units where a lead

poisoned child resides, vacant units which will be rented to low income families with children are also included.

The Department of Trade and Development was awarded a three-year \$3 million HUD Lead Hazard Reduction Demonstration Grant in 2008 that was completed in 2011. The focus of this HUD grant proposal was on targeted neighborhoods where the majority of the City's elevated blood lead level caseloads are located. A total of 352 housing units received the initial lead risk assessment inspection. A total of 279 income-eligible, primarily owner-occupied housing units, where a child under the age of six resides or frequents, located within the target neighborhoods had lead hazard control work performed. The neighborhoods that have been documented as having a high prevalence of lead poisoning are: Westend, Over-the-Rhine, Mt. Auburn, Fairview-Clifton-University Heights, Corryville, Walnut Hills, Evanston, Madisonville, Avondale, Northside, South Cumminsville, North Fairmount, South Fairmount, East Price Hill, Lower Price Hill, West Price Hill, Bond Hill, and Carthage. Nine of these neighborhoods are also located within the City of Cincinnati's Empowerment Zone.

The Department of Trade and Development was awarded another three-year \$3 million HUD Lead Hazard Reduction Demonstration Grant in 2012. Mirroring the 2008 grant, the goals of this program are to address lead hazards in 240 income eligible housing units, primarily owner-occupied units, where a child under the age of six resides or frequents, located within the targeted neighborhoods where the City of Cincinnati experiences high prevalence of lead poisonings. The benchmarks to be attained with this grant are: 180 single and two-family units, 25 rental units, and 35 vacant units (for a total of 240 units) to be made lead-safe, at least 500 children residing in lead-safe residences, with 5,000 individuals to be educated on healthy homes, weatherization and energy efficiency. There are 30 lead education in-service training sessions and EPA lead safe renovator worker trainings and healthy homes training for 100 persons proposed with this grant, along with additional outreach activities.

Finally, the Department of Trade and Development has integrated HUD's lead-based paint regulations into its housing programs requiring risk assessments and lead hazard reduction work on rehabilitation projects completed with Federal assistance on structures built before 1978. Since 2000 through 2012, over 3,000 dwelling units have been assessed and over 1,800 dwelling units have been inspected and deemed lead safe (several of these units were identified as having no lead-based paint present from the lead risk assessment).

Actions planned to reduce the number of poverty-level families

The City of Cincinnati primarily focuses on programs that promote business development and provide employment training in its efforts to reduce the number of poverty level families. The Consolidated Plan includes three goals to address community development needs and reduce the number of poverty level households:

Economic Development Goals

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

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

Quality of Life Goal

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

The City plans to accomplish these goals and objectives through programs such as Blueprint for Success, Youth Employment Programs, Neighborhood Capacity Building and Technical Assistance, and the Neighborhood Business District Improvement Program. These programs are the primary way the City strives to expand economic opportunities, principally for low- and moderate-income persons, during the next year. Performance measures and funding levels for these programs are included in AP-20 Annual Goals and Objectives, AP-38 Project Summary, and AP-35 Projects.

Actions planned to develop institutional structure

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

Historically, the City has partnered with a Community Development Advisory Board (CDAB) which evaluated program requests and made 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 City Council and the Administration worked to revise the CDAB from 2009 through 2012. In 2012, the CDAB was re-established and was utilized in the 2012 Action Plan process, as well as the 2013 and 2014 Action Plan process. In 2014, the City Administration will work with the CDAB in preparing the 2015-2019 Consolidated Plan.

Audits conducted by the HUD Office of Inspector General (OIG) of the HOME Program in 2007 and 2008 led the City to review its practices and procedures. The City formalized its' Processes and Procedures. The document provides direction for basic processes in the administration of the Consolidated Plan programs for the following departments: Budget and Evaluation; City Planning and Buildings; Office of Contract Compliance; Citizen Complaint/Internal Audit; Accounts and Audit; Treasury; Law Department; and Trade and Development.

HUD 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 utilizing these functions to the best of its' ability 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) working group that focuses on the close out of projects. The IDIS team has made significant progress in closing older projects, projects remaining open following final draw of funds, and projects closed following completion but during rent up without complete beneficiary data.

The City will continue its efforts to increase training, execute better 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 Rental Rehabilitation Program are referred to the Cincinnati Metropolitan Housing Authority to investigate the availability of Section 8 Housing Vouchers.

The City partnered with Hamilton County to update the Impediments to Fair Housing study for the 2010-2014 Consolidated Plan. The update was received in May 2009 and a joint committee representing Hamilton County, Cincinnati Community Development, City Planning and Buildings, and Budget and Evaluation met regularly throughout 2012 to continue to evaluate the findings in the Update, and develop various strategies to implement solutions to the findings. In addition, a citizens advisory committee provided guidance on addressing the impediments. On July 20, 2010, the City Manager submitted the City's Fair Housing Action Plan which will drive the City's fair housing efforts during the next few years. The joint committee between County and City staff continue to meet regularly to work to resolve each of the 18 identified impediments.

The CoC is organized on a year-round basis to include a number of working groups whose role is to coordinate services and housing for their specific group of homeless persons, improve access to mainstream resources and benefits, and facilitate improvements in systems needed by the homeless. Each of the working groups meet at least quarterly. These working groups are divided as follows: Family Shelter Partnership, HMIS Advisory Committee, Homeless Individuals Task Force, Homeless Outreach Group, Permanent Housing Provider Group, Transitional Housing Group, Shelter Plus Care Provider Group, Substance Abuse Group, and the Benefit Access Group. A representative of each group plus a City, County, and homeless coalition representative are seated on the Homeless Clearinghouse, which meets quarterly to oversee planning, coordinate efforts and monitor progress on the goals of the consolidated plan.

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

As stated previously, the CDAB is a volunteer citizen group appointed by the Mayor and approved by the City Council. Its membership consists of representatives from the following areas: Community Council leadership, human services, labor, low-income advocates, small business, corporate entities, lenders, developers, real estate, Community Development Corporations (CDCs), and City staff. Its 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.

Discussion

Program Specific Requirements

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

Introduction

The City's program specific requirements for CDBG, HOME, ESG and HOPWA are listed below. For CDBG, the City of Cincinnati uses a three-year average to ensure compliance with the low moderate income benefit. The three years at this time are 2013, 2014 and 2015.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

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

The City plans to continue to operate its HOME Investment Partnership Program similar to previous years. As such, there are no other forms of investment planned as part of the 2014 Action Plan other than those described in CFR § 92.205(b).

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:

In 2014, the City will continue to assist homebuyers through the Strategic Housing Initiatives Program, Single Family Homeownership Development with Cincinnati Habitat for Humanity, Down Payment Initiative Program, and other specific projects/programs as opportunities present themselves. Resale or recapture provisions are stated in each contract and enforced through deed restrictions or homebuyer agreements, mortgages, and promissory notes. The City reviewed resale and recapture provisions for all HOME program contracts in 2009. The City utilizes the recapture provision for all assistance to homebuyers. Included below is the recapture language used in contracts for the City's HOME programs.

Homebuyer Assistance (Strategic Housing Initiatives Program, Single Family Homeownership Development with Cincinnati Habitat for Humanity, Down Payment Initiative Program):

Prior to the disbursement of the Loan Funds, the Borrower agrees to execute and deliver to the City: (A) the Note Homebuyers receiving down payment assistance to purchase a home are required to sign a Promissory Note and Mortgage. The Promissory Note contains Recapture Provisions that specify the repayment terms in the event that the housing does not continue to be the principal place of residence of the family for the duration of the period of affordability; (B) a mortgage to the Property, as security for the Note and the Loan Funds; (C) all documents required by the City's conditions of approval letter; and (D) all other documents and information reasonably requested by the City, each in a form acceptable to the City.

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:

The City utilizes the resale provision for all rental projects. Included below is the resale language used in contracts for the City's HOME programs.

Rental Development or Rehabilitation (Strategic Housing Initiatives Program, Rental Rehabilitation Program):

Developers and property owners who receive HOME funds through the Rental Rehab Program are required to keep the assisted units available for occupancy by tenants meeting HOME income guidelines throughout the applicable affordability period. This Resale Restriction is enforced using a Restrictive Covenant which runs with the land and does not expire upon sale of the property. In addition to the Restrictive Covenant, the City requires all lien holders (including State or Federal agencies), to sign a Mortgagee Consent to Restrictive Covenants. The Mortgagee Consent document is recorded along with the Restrictive Covenant and the purpose is for each lien holder to acknowledge the affordability restrictions outlined in the City's Restrictive Covenant and to grant the RC priority over their mortgage. This preserves the project's HOME affordability requirement in case of an adverse property transfer. The City has always recorded the Restrictive Covenant's on HOME funded properties, but we initiated the addition of the Mortgagee Consent in June 2012, to strengthen our protection of the HOME affordability period. Subsequent purchasers of the property must fulfill the remaining time of the affordability period. A mortgage is also placed on the property to ensure the HOME funds are protected. Special circumstances regarding enforcement of the Restrictive Covenant may exist in the event of a foreclosure or deed in lieu of foreclosure.

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 2014.

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

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

In order for emergency shelters to receive Emergency Solutions Grant funds, the City has mandated that participating shelters be monitored and in compliance with the Emergency Shelter Program, Operations, and Facility Accreditation Standards. Strategies to End Homelessness monitors all emergency shelter agencies annually for compliance. A copy of the Shelter Standards and Shelter Diversion Manual is attached in the Action Plan Attachment parts 4 and 5 respectively.

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

Cincinnati/ Hamilton County utilizes a Central Access Point (CAP). CAP currently screens and schedules intakes for the four family shelters, a shelter for 18-24 year old individuals, a single men's shelter, and a transitional housing program for single men with substance abuse issues. CAP also refers to a Shelter Diversion program, a case management program, to help individuals avoid entering shelter. Everyone who telephones CAP is screened in the same manner to determine which program is best suited the caller's needs. The caller is finally referred to the appropriate program and contacts the agency directly to complete their intake.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

In 2011, representatives from Hamilton County, the City of Cincinnati and Strategies to End Homelessness met to discuss the changes in the new Emergency Solutions Grant. At this meeting, the City and County decided that 2012 ESG funds would be used for emergency shelter expenses and homeless prevention programs. The City and County decided that the emergency shelters would receive the same level of funding received in the 2011 funding cycle and that the remainder of the funds would be used to continue the homeless prevention program. This was a one year process as new regulations were being defined; in the future, funding decisions will be made by the Continuum of Care. In 2012 and 2013, the decision was made to allocate the maximum amount of funding for emergency shelters in accordance with new regulations.

Annually, Strategies to End Homelessness prepares an Emergency Solutions Grant application for shelter funding. The application is sent via email to the prior year's providers and posted on the End Homeless website for any other applicants interested in applying. Agencies with interest in applying must be active in the community's HMIS, VESTA and have the prior year data available before the allocation process begins. The Emergency Solutions Grant Shelter allocation process is an inclusive process of the ESG provider network. Providers gather annually to review the needs within the community and to allocate funds. Allocation recommendations are forwarded to the City of

Cincinnati's Office of Budget and Evaluation for inclusion in the annual budget presented to the City Council for final approval.

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.

All sub-recipients are in compliance and have at least one board member representing the homeless or formerly homeless.

5. Describe performance standards for evaluating ESG.

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

Discussion

This is not applicable.

2014 ANNUAL ACTION PLAN ATTACHMENT 1 CONSOLIDATED PLAN GOALS AND OBJECTIVES

Consolidated Plan Goals and Objectives

Development Vision Statement

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

Overall Development Goal

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

Housing Goals

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

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

Housing Objective 2 (H-2): Develop and retain rental units that are affordable for persons of low and very low-incomes in a manner that is consistent with City policy. Units should be located near or within neighborhood business districts to create stronger mixed-use districts. Rental units are encouraged to be developed in conjunction with market rate units and in areas with lower levels of poverty to create stable mixed-income communities and support economic integration. Whenever possible, sustainable, energy-efficient, green building technologies and universal design principles should be used in the development of housing units and sites.

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

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

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

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

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

Economic Development Goals

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

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

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

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

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

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

Quality of Life Goal

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

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

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

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

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

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

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

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

A. Specific to Chronic Homeless

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

B. All Homeless Individuals and Families

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

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

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

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

A. Specific to Chronic Homeless

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

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

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

B. All Homeless Individuals and Families

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

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

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

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

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

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

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

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

A. Specific to Chronic Homeless

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

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

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

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

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

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

B. All Homeless Individuals and Families

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

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

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

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

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

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

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

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

A. Specific to Chronic Homeless

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

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

B. All Homeless Individuals and Families

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

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

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

2014 ANNUAL ACTION PLAN ATTACHMENT 2 CITIZEN PARTICIPATION COMMENTS

A public hearing was held in at 805 Central Avenue, Centennial II Plaza on September 12, 2013, to receive public comments on the 2014 Annual Action Plan which was available for review and comment on the City's web site beginning August 28, 2013.

Residents and Others in Attendance: Morris Williams; Linda Holterhoff; Joy Marshall; Alice Skirtz; Elizabeth Brown; Margo Warminski; Angela Sterns; Matt Bourgeois; Rosalind Fultz; Patricia Garry; and Dorothy Smoot.

Community Development Advisory Board (CDAB) Members in Attendance: Alex Peppers; Ed Cunningham; Michelle Dillingham; Simon Sotelo; Kathy Atkinson (chair); Matt Strauss; Bobby Maly; Kevin Finn; Reema Ruberg; Dwen Chester; and Kiya Patrick.

City Staff in Attendance: Dawn Geoppinger; Eileen Turner; Dan Kalubi; Aisha Tzillah; Peggy Roger; Zach Woolard; and Joy Pierson.

The public hearing was convened by Kiya Patrick, Community Development Administrator, who welcomed the public and introduced the CDAB. Everyone interested in speaking was asked to complete a comment card. Interested speakers were advised that the speakers would be called on a first-come, first-serve basis, with minutes available to speak.

An overview of the 2014 Action Plan was provided, along with information regarding the four grant programs included in the plan: CDBG, HOME, ESG and HOPWA. Kiya outlined the process in developing the 2014 Action Plan which included soliciting departmental requests, seeking CDAB feedback, seeking public feedback and making recommendations to the City Manager. The City Manager will present the information to City Council for final approval.

Speakers were asked to address the CDAB and called in order of public comment cards received.

SPEAKERS:

1. Morris Williams, from Bond Hill, addressed concerns regarding the Commons on Alaska project. He stated that he is involved in the Friends of Avondale 29 which is opposed to the Commons on Alaska project. He said he hopes that the funds for this project are reallocated to another project. He stated that he lives in Bond Hill but has family members who live on Alaska Avenue where the project will be located. Mr. Williams stated that he has been a community builder since he was 14 years old. He spent 30 years working with a coalition for strong and integrated neighborhoods, and this is a bad decision. He stated that if it was 20 units for homeless people - not 99 units for severely homeless – it would be better. He is also concerned that the project is next to two daycare centers and six elementary schools. He stated that he doesn't know who would want this to be near their

- homes. Mr. Williams said that he understands that we all need to help the homeless; however, his concern is that no other city has homeless shelters except Cincinnati. He also stated that all shelters are in black neighborhoods, there are two new facilities going to Mt. Auburn and this is 12 blocks away in Avondale. Mr. Williams is concerned about the demographics of the people who will be served at the new facility because they may hurt children and seniors. He said that if the city wants to revitalize Cincinnati it is not a good idea to put this in neighborhoods with low and moderate income needs. He said he is concerned that 89% of the potential residents are unemployed and will be walking the streets.
2. Margo Warminski from the Cincinnati Preservation Association spoke in favor of the Historic Stabilization of Structures program. She explained that the program is small but provides funding to repair severely deteriorated buildings. She stated that it preserves neighborhood landmarks for future development and helps economic development of the City. Ms. Warminski stated that this preserves a sense of place which follows an element of the new Plan Cincinnati comprehensive plan. She cited a recent example of two buildings on E. McMillian in East Walnut Hills that were deteriorated and stabilized on Peebles Corner. These buildings are now being developed with two businesses moving in them. She wants to see this program saved and wants to see funding levels increased.
 3. Elizabeth Brown from Housing Opportunities Made Equal (HOME) explained that this private organization provides fair housing services to the Greater Cincinnati area and helps to build integrated neighborhoods. HOME provides fair housing training and free mediation with homeowners and the real estate association. She pointed out that the services are funded by city contracts and that the funding has been reduced by almost 30% over the last three years. Ms. Brown is concerned about what these cuts mean for residents who seek justice; and small landlords who need training and mediation services. She explained that Plan Cincinnati includes a commitment to fair housing and that because the City accepts CDBG funding from HUD there is an obligation to provide fair housing services. Each year, a city staff person must certify that the City is meeting the fair housing needs of the city and HUD is looking at fair housing needs more closely. Ms. Brown said that Cincinnati has had recent fair housing issues, including an issue two years ago with a CMHA Board member being charged with fair housing violations and an issue last year with a “whites only” sign posted on an apartment pool. She pointed out a recent complaint from a P&G professional who was denied housing because of his race. *(Elizabeth also provided written comments which are included as Attachment A).*
 4. John Schrider of Legal Aid spoke about the need to help prevent foreclosures and to support fair housing. Mr. Schrider said that you can look at the vacant, blighted foreclosed properties throughout the City and see that it is getting worse and is a huge problem. He said we need to prevent more foreclosures and need to support getting loan modifications and City funding can support that. He said that

Community Development Corporations (CDCs) are doing all they can but the City needs to consider a new and improved homesteading program to convert buildings to low and moderate income housing. He suggested using the City's old program as a model but that it needs additional funding. He did not advocate taking funding from services provided now through Legal Aid. Mr. Schrider also discussed fair housing pointing out that it has been 50 years since Dr. King's I Have a Dream speech and that much progress has been made but that there is still work to do. He pointed out that fair housing is part of Plan Cincinnati and supports the Tenant Based Rental Assistance program as a good way to support this. He talked about a recent article in the Cincinnati Enquirer that talked about whether or not Cincinnati is a city that welcomes people and said that we need to do more to welcome all people.

5. Matt Bourgeois from Cincinnati Neighborhood Business Districts United spoke in favor of the Neighborhood Business District Improvement Program (NDBIP). He explained that NDBIP is successful because it includes peer review, engages business districts no matter where they are in the process of development, and requires active participation from NDBIP representatives. The peer review process includes all organizations who apply to review each other's applications, vote on the best options, collectively decide on the fairest decisions and removes politics from decisions. The program engages each business district no matter where they are in the process. Mr. Bourgeois explained that Clifton Heights started 10 years ago and went from planning stages, to gateway signs, to façade improvements and ultimately to streetscape improvements at McMillian and Calhoun. Lastly, he talked about the amount of time and active participation needed for NDBIP, including a ½ day bus trip, three consecutive evenings from 6 to 9 PM, in addition to the application review up front. It is very time consuming. Last year, they received 29 applications from 22 neighborhoods and 13 projects were funded in 12 NBDs. If cuts are made to last year's program, the Avondale streetscape would not have been funded and this is a critical development given the MLK exchange development. He would hate for this to happen in 2014.
6. Patricia Garry of the Community Development Corporations Association of Greater Cincinnati (CDCAGC) spoke about the funding provided to local CDCs through CDCAGC. She explained that 10 CDCs are supported this year with operating support including Madisonville and Walnut Hills organizations and the process used is not as complex as that of NDBIP. The funding process, which started in 2008 with LISC, was initially for 4 neighborhoods and then broadened the scope to include a RFP and application review. The committee reviewing the applications is made up of non-development representatives who recommend funding. The organization meets with the funded CDCs four times a year and sees its role as capacity building by sharing information from one area CDC to another CDC. The organization also meets as a whole twice a year.
7. Rosalind Fultz who is a resident of the contested area between Avondale and North Avondale spoke against funding the Commons on Alaska project. She said

it was difficult to speak against the project as a practicing Christian and stated that there was growing opposition by citizens who were never involved in civic engagement. She stated that there has been no transparent communication about the project with residents on Alaska Avenue. She said she appreciates HUD's investment in redeveloping mixed income neighborhoods but wants the process for this project to be stopped. Ms. Fultz said that it is important for HUD to know that the Avondale 29 Group will keep fighting to stop the project because it is a violation of the civic and civil rights of those in the neighborhood. She said they should not be accused of NIMBYism because the people close by to the project are engaged and committed people. She said that 85% of the people to be housed in the project will have severe and prolonged homelessness; 50% will have chronic substance abuse; 30% will have dual diagnosis; and many will be unemployed. She said that the NAACP, CFT and North Avondale community is against the project, as it is too close to a daycare center, walking distance to a charter school and close to six other schools and one more daycare center. She understands that homeless advocates want to identify locations that will permit clients to integrate into neighborhoods. She said that Avondale 29 made a Freedom of Information Act (FOIA) request in order to review the developer's application. The application revealed that most of the individuals to be assisted have no social ties or family ties to the neighborhood which concerns the people of the neighborhood.

Kathy Atkinson concluded the meeting and explained that there was still an opportunity to register comments online. She stated that the CDAB will take the feedback from the speaker's constituencies into consideration when making recommendations.

DISCUSSION OF COMMENTS NOT ACCEPTED

The funding for the Commons on Alaska project was funded with prior year HOME funds and is not included in this Action Plan.

Other comments in support of six existing programs - Historic Stabilization of Structures, Fair Housing, Tenant Based Rental Assistance, Emergency Mortgage Assistance, Neighborhood Business District Improvement Program, Operating Support for Community Development Corporations and Drug Elimination Program- were considered in making funding levels for these programs. Some programs received higher than 15% funding cuts due to prior year resources being available for future projects.

The former Homesteading Program was not included for funding due to a lack of resources.



Housing Opportunities Made Equal

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City of Cincinnati

2014 Consolidated Plan/Action Plan

Public Hearing

Thursday September 12, 2013

Housing Opportunities Made Equal (HOME) is the private fair housing agency serving the greater Cincinnati area. Our mission is to eliminate illegal discrimination in housing and to help build stable integrated communities. People who believe they have been treated unfairly call HOME. They are often angry and upset when they call. Our trained staff helps them sort through the situation and consider their options, sometimes it is poor property management or an issue of tenant rights, and sometimes it sounds like potential illegal discrimination. In those cases we work with the person to gather evidence and help them pursue enforcement of the fair housing laws. HOME also conducts fair housing training for Realtors, landlords, and the general public. And we jointly sponsor a free Housing Mediation Service with the Apartment Association and the Real Estate Investors Association.

The City contracts with HOME to provide these services for its residents using CDBG funding. In the last few years the amount the City allocates to fair housing has been reduced significantly. With the reduction proposed in the draft 2014 Action Plan, it will be almost a 30% reduction in three years. I am concerned about this reduction in fair housing services for the City; what it means for the residents who call us angry about what they see as injustice, what it means for the many small landlords in Cincinnati who need training, and what it means for the availability of mediation as an option to resolve disputes.

The City also receives a direct benefit from funding fair housing services. When the City receives the Federal dollars that are allocated through the Action Plan, it assumes a fair housing responsibility. One of the principal ways it meets this responsibility is by funding fair housing services for City residents. Each year a City official must sign a Certification that Cincinnati Affirmatively Furthers Fair Housing when it sends in its funding request. HUD has become very serious in enforcing this requirement; in recent years several cities have had Block Grant dollars withheld because HUD found they were not furthering fair housing.

We continue to have fair housing issues in Cincinnati. Just 2 years ago, HUD made findings of racial discrimination by the housing authority Board. The City made national news when a small landlord posted a White Only sign. And we are currently working with a young professional African American man who was transferred to Cincinnati by Procter & Gamble who called HOME when he was turned down for a rental home because of what he believes is racial discrimination. For these and many other reasons, I ask that you do what you can to not further reduce funding for fair housing services in Cincinnati.



I would like to raise one other funding issue with you that does not just relate to HOME. Although it is not explicit in the draft Action Plan, in the last couple of years the City has withheld 10% of the amount allocated for specific projects for what it calls “project administration.” It is my understanding this amount is in addition to the line item called Administration. This was a change a couple years ago that resulted in a 10% reduction of resources available to the organizations actually conducting the programs on the ground. I certainly do not fully understand the City’s accounting and budgeting processes and there may be another explanation, but this seems like double-dipping from Federal funds to make up for reductions in the City’s General Budget. I ask that this practice be looked at and explained.

Elizabeth Brown
Executive Director
Housing Opportunities Made Equal

LEGAL AID SOCIETY OF SOUTHWEST OHIO, LLC

AN AFFILIATE OF THE LEGAL AID SOCIETY OF GREATER CINCINNATI

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October 2, 2013

Hon. Milton R. Dohoney, Jr.
Office of the City Manager
801 Plum St., Suite 152
Cincinnati, OH 45202-1979

**RE: Proposed Funding for the 2014 CDBG Grant for Emergency
Mortgage Assistance**

Dear Mr. Dohoney:

I am writing to request continued funding at the 2013 levels for the Legal Aid Society's 2014 CDBG grant for Emergency Mortgage Assistance (EMA).

This grant is vital to the low and moderate-income homeowners who live in the City of Cincinnati. In the past 12 months, Legal Aid has used the EMA program to prevent 33 foreclosures in Cincinnati and keep the families in their homes.

The EMA program makes a direct payment to lenders on behalf of low and moderate-income Cincinnati homeowners who face foreclosure due to job loss, illness, death of the primary wage earner, or other circumstances beyond their control. These homeowners can receive a one-time grant up to \$2500 to bring their loan current if they have re-established an income stream to continue future mortgage payments. Often this grant makes the difference in whether or not a home can be saved from foreclosure. The EMA program also funds part of the cost of services provided by Legal Aid staff in assisting homeowners avoid foreclosure.

EMA grants and counseling help families remain in their homes, which in turn helps stabilize neighborhoods by reducing the number of vacant, foreclosed properties. In the long run, this "up-front" grant to homeowners saves the City money.

LEGAL SERVICES IN

Brown County
Butler County
Clermont County
Clinton County
Hamilton County
Highland County
Warren County



Vacant, foreclosed properties produce public safety costs and reduce municipal tax revenue due to the reduced property values and home equity of properties neighboring foreclosed properties.

A recent federal GAO report on the costs to communities of vacant, foreclosed properties highlighted that one vacant, foreclosed property reduced the value of each neighboring property by thousands of dollars (GAO 12-34, 2011, *Vacant Properties: Growing Number Increases Communities Costs and Challenges*). That cost does not include the reduction in tax revenue or the increased cost of public services to deal with vacant homes.

Since October 2012, Legal Aid has expended \$70,000 in EMA funds to 33 low to moderate-income families - an average grant of about \$2,121 per homeowner. This means that over the last year 33 homes in the City of Cincinnati continue to be occupied by their owners with affordable mortgages as a result of this grant. Importantly, Legal Aid expended these funds in just ten months - we were out of EMA funds by mid-July.

Here are the stories of two typical homeowners that Legal Aid has helped avoid foreclosure over the last year using the City's EMA grant.

An East Price Hill family who had lived in their home for seven years fell behind on their mortgage payments after the family's primary breadwinner became disabled. The family struggled to keep up with payments on their mortgage but were unable to do so. The interest rate on their mortgage loan was almost 10%, so they thought they might be able to refinance to reduce their payments. However, the value of their home had decreased, so the family had no ability to refinance. Legal Aid represented the homeowners in the foreclosure case brought by their lender. Legal Aid obtained a loan modification for the homeowners that reduced the family's payments and cut the principal balance in half. The City's EMA grant provided the necessary funds to allow the family to accept this loan modification.


A Walnut Hills woman who had lived in her home for fourteen years fell behind on her mortgage payments after an uninsured family member suffered a serious illness that resulted in thousands of dollars in medical bills. The homeowner used all of her income and savings but was unable to keep up with her mortgage payments. Legal Aid represented the woman in the foreclosure case brought by her lender and obtained a loan modification that allowed her to get caught up on her mortgage. The City's EMA grant provided the necessary down payment for the loan modification.

These stories help illustrate the impact the City's EMA program is having on Cincinnati families and neighborhoods. Without continued funding of this grant at 2013 levels, far more homes will be lost to foreclosure, and the cost to our communities will be that much greater.

Hon. Milton R. Dohoney, Jr.
Page 3
October 2, 2013

Please continue to fund the City's EMA grant at 2013 levels (\$100,000) for 2014.

Sincerely,



Mark B. Lawson
Managing Attorney
Consumer Group

MBL:cfc

cc: Jeff McElravy
Kiya Patrick

Statement from the Community Development Advisory Board

In May, 2012, the CDAB was convened to review the staff recommendations for allocating CDBG and HOME funds for 2013. The members of the Committee were appointed by Mayor Mallory and approved by City Council representing banks, developers, builders, non-profit organizations and neighborhood resident/leaders. The members of CDAB collectively bring a wealth of professional expertise and civic leadership to support City Council, City Administration and City staff in making decisions with respect to the use of CDBG and HOME dollars to ensure the greatest return on the invested dollars benefiting low/moderate income persons and eliminating blight within our City.

The newly appointed committee was oriented to the purpose, the role, and history of CDAB. The committee members accepted the responsibility to: 1) advise the City Manager on community development and housing needs; 2) recommend goals and strategies to address those needs; and 3) evaluate performance of programs that utilize Consolidated Plan resources.

The urgency of making budget adjustments as recommended by City staff for the balance of the 2013 fiscal year due to reduced federal funding levels was stressed as the first task to be undertaken by CDAB.

Over the next several weeks, the programs utilizing Consolidated Plan resources educated CDAB through reports and presentations that covered the strategies being implemented and the success of those strategies in meeting the goals set forth in the 2010-2014 Consolidated Plan.

At the end of the weeks of presentations, CDAB engaged in a **priority** ranking process of all programs that we agreed would guide our recommendations in the final years of the 2010-2014 Plan. While all funded programs aligned with the specific goals outlined when the Plan was submitted in 2009, the level of funding to implement the strategies was not forthcoming from HUD to successfully accomplish all of those goals.

In the prioritizing of the programs CDAB took into consideration the most pressing needs and the greatest opportunities for successful outcomes for the City in the balance of the current 5-year Consolidated Plan. The **priority** rankings are not presented as performance evaluations but rather guides to be followed to most effectively use the decreasing dollars available to us.

The Committee is also aware of significant organizational changes within City Administration at the start of the 2014 fiscal which began in July, 2013. This resulted in changes in the staff support for CDAB. This summary is intended to serve as a guide for the staff currently assigned in the various City departments and divisions as they submit budget requests for CDBG and HOME dollars for the 2014 fiscal year for approval and implementation.

The priority rankings are included in the attachment to this document. The green color coded projects indicate the highest priority ranking in green. CDAB believes these projects must be funded at a level that ensures successful outcomes. The second tier rankings in beige are good to fund while the third tier in violet should be funded at some level if there are dollars remaining to be allocated.

At the August 20, 2013 meeting of CDAB, a spreadsheet of proposed funding levels requested by City staff for 2014 CDBG funds was presented. The analysis of the requests demonstrated that an across the board reduction of 15% for the majority of programs was applied. This would seem to indicate that the priority rankings of CDAB were not taken into consideration as these funding levels were proposed. Based on that observation, CDAB did not endorse any of the proposed 2014 funding requests. We respectfully request due consideration be given to the priority rankings as the 2104 Action Plan is finalized and presented for City Council's budget approval.

Prepared by Kathy Atkinson, CDAB Chair on behalf of CDAB

Submission date: September 26, 2013

2014 ANNUAL ACTION PLAN ATTACHMENT 3

2010-2014 Analysis to Impediments to Fair Housing and Actions Taken and Planned to Date

The summary below provides the list of impediments to fair housing choice and actions that have been identified to overcome effects of impediments, as well as progress to date.

The City of Cincinnati and Hamilton County jointly requested that Housing Opportunities Made Equal, a Fair Housing Agency, conduct the Analysis of Impediments to Fair Housing Choice (A.I.) for the City and County jurisdictions. The A.I. was completed in May 2009, and in the A.I., 18 recommendations were made to respond to the issues of:

- 1) NIMBYism (Not In My Back Yard) based on stereotypes;
- 2) Improving choice in the Housing Choice Voucher Program;
- 3) Predatory lending and lending discrimination;
- 4) Discrimination against people with disabilities;
- 5) A lack of accessible housing;
- 6) Discrimination against families with children; and
- 7) Sexual Harassment.

The City and County then began a series of monthly meetings with a working group made up of staff from Cincinnati Department of City Planning and Buildings, Department of the City Manager Office of Budget and Evaluation, Cincinnati Department of Community Development, and Hamilton County Community Development, to address the report and its recommendations, and to create a Fair Housing Advisory Committee (FHAC) to advise the City and County on the plan and its final recommendation. The FHAC is charged with expanding on the draft responses to the identified impediments, including (1) determining goals and timelines to address each impediment, (2) resources or programs that will be used in financing the fair housing actions, (3) individuals, groups, or organizations to be involved in each action, including defining responsibilities, and (4) identifying a process for monitoring the progress in carrying out each action and evaluating its effectiveness.

The FHAC was formed, consisting of 16 representatives, including City and County staff, from agencies serving people with disabilities, fair housing advocates, affordable housing advocates, local banks and lenders, Legal Aid Society of Greater Cincinnati (Legal Aid), the Cincinnati Metropolitan Housing Authority (CMHA), and others. The City and County staff evaluated the responses and recommendations from the committee and have formulated this Fair Housing Action Plan. Updates are posted to this document as they are implemented.

2010 Report

The FHAC met three times during the spring of 2010 and City and County staff met regularly to prepare the initial impediments report and action plan.

2011 Update

No meetings were held during 2011 of the larger committee; however City and County staff met regularly and included various representatives of this committee or the larger community to hone in on specific impediments.

2012 Update

The larger FHAC was not convened in 2012 mostly due to key personnel changes in the City and County core “working group.” It had been anticipated new HUD regulations regarding Fair Housing and the development and implementation of Impediments Studies would be released necessitating a broader community discussion. That did not occur in 2012, but the new HUD regulations are anticipated to be released in April 2013. The core “working group” did expand the quarterly meetings to include representatives from Housing Opportunities Made Equal and the Center for Independent Living Options. In addition, the core group worked to include a regular representative from the CMHA as a new executive director was recently hired at that agency.

2013 Update

CMHA’s new Chief Executive Officer, Gregory Johnson, was hired in early January, and he agreed to be the agency’s representative to the core group. The larger FHAC will be convened in late 2013 as the proposed new Fair Housing Rule was released in June 2013. Work will also begin on our next Analysis of Impediments to Fair Housing Study.

2014 Plans

The FHAC will work on the 2015-2019 Analysis of Impediments to Fair Housing Study with citizen participation and community outreach.

Timeline: Ongoing

NIMBYism based on Stereotypes

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

2010 Report

Currently the Housing Authority keeps statistics on their clientele, including statistics on numbers of elderly, disabled, and employed receiving assistance. This information is brought to the public’s attention occasionally, when prompted. In addition, the local HUD office maintains a spreadsheet showing assisted housing by community and neighborhood in the City and County. The City and County would like to work with the Housing Authority and HUD to disseminate this information more widely. This could be done through a media campaign, or through other venues such as housing workshops. The City, the County, CMHA, Housing Opportunities Made Equal, and Affordable Housing Advocates will work together to conduct a joint informational campaign in 2011.

2011 Update

CMHA has the statistics readily available upon request, but not currently on their website. They agree that adding this information to their website would make this information more accessible to the public.

The Affordable Housing Advocates (AHA) performed a PR/Marketing on the “true face” of affordable housing. All the parties mentioned should get together to talk about what each of us is doing.

2012 Update

No updates to report.

2013 Update

CMHA's new Chief Executive Officer, Greg Johnson, has made it a duty to educate the Hamilton County community about CMHA and the clients that it serves. Mr. Johnson has held over 100 Community Outreach Meetings throughout the county to educate the public about CMHA and listen to concerns directly from community residents. In addition, four communities have executed "Good Neighbor Agreements" and four more communities have agreements pending.

The City is addressing NIMBYism issues related to the placement of permanent supportive housing in Avondale. City Council initially supported the Low Income Housing Tax Credit (LIHTC) project called Commons on Alaska, but neighborhood opposition is growing to the project. The City is working with the developer and the Strategies to End Homelessness to educate the community about the need for the project and the facts about the project.

2014 Plans

CMHA hopes to hire a Community Liaison to work directly with local communities to quickly address concerns. CMHA plans to have its property managers start to attend community meetings in their respective neighborhoods. All parties should pursue the CMHA Housing Choice Voucher program discussion in 2014.

Timeline: Ongoing

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

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

A condition of funding for the City's Neighborhood Support Program (NSP) could require that neighborhood community councils facilitate discussion groups and/or programs on fair housing issues.

To tie fair housing issues more closely with development projects, the City and County will encourage developers awarded contracts, to attend fair housing training. The City and County will require developers seeking public assistance for any project with at least 50 housing units to conduct an analysis of the impact of the development on racial integration in the community. The analysis will assist jurisdictions in determining whether support for the project is consistent with their obligation to affirmatively further fair housing.

Public Service Announcements will be used to disseminate information on Affordable/Fair Housing concerns. CMHA should provide outreach and data to the community and advertise in their newsletter.

2010 Report

These two items – requiring that neighborhood community councils facilitate discussion groups and/or programs on fair housing issues and requiring developers seeking public assistance for any project with at least 50 housing units to conduct an analysis of the impact of the development on racial integration in the community – have not been implemented.

2011 Update

CMHA sponsored a booth at the Neighborhood Summit in 2011. CMHA is currently working on a marketing campaign, featuring “good stories” about their clients. CMHA has made changes to its monthly newsletter, utilizing an email format. This provides the opportunity to link to stories to outside information such as specific studies in an effort to educate the public further about fair housing. CMHA also continues to use its blog and twitter account as a vehicle for putting a face on affordable housing. As part of the Affordable Housing Advocates housing report event they had speakers talk about their experiences. See links to those videos on CMHA’s blog below:

- <http://www.cintimha.com/cmha-resident-participates-in-the-affordable-housing-advocates-event.aspx>
- <http://www.cintimha.com/from-subsidized-housing-to-home-ownership.aspx>

The City of Cincinnati amended its Rental Rehabilitation manual to include Fair Housing training and is working to garner neighborhood support for these amendments.

2012 Update

CMHA again sponsored a booth at the Neighborhood Summit in May 2012. They also continued their marketing campaign, featuring “good stories” about their clients.

2013 Update

Housing Opportunities Made Equal and several partner organizations sponsored a forum on March 13, 2013 called “When your neighbor is different from you, what happens next?” Residents and community leaders shared ideas and experiences about living in diverse communities. The event started with a panel of representatives of Pleasant Ridge, North Avondale, and Price Hill, and then participants engaged in an open discussion of the challenges and benefits of community diversity.

CMHA’s CEO, Gregory Johnson, has emphasized inclusion and encouraged communities to welcome CMHA clients into their neighborhoods through Community Outreach meetings and meetings with other local community groups. Mr. Johnson also encouraged these organizations to provide information about their neighborhoods as part of a welcome package to new residents. He believes this will help create a sense of inclusion and belonging to the community.

2014 Plans

CMHA is also willing to present to the First Suburbs group. A time and date should be coordinated through CMHA’s Communications Office.

Timeline: Ongoing

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

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

When 2010 census results are released and the Stable Integrated Communities research is updated, it is hoped that additional City neighborhoods and County communities will be added to the list of those that have been racially integrated for at least 20 years. The City Council and

County Commission will honor the Stable Integrated Communities at public meetings. AHA is interested in being invited to any of the mentioned forums to present information about their group.

2010 Report

In February 2010 City Planning and Buildings held a kick off at the annual city-wide Neighborhood Summit for the start of the Comprehensive Planning process. This plan will be completed in 2012. City Planning will use the planning process and the Comprehensive Plan to help create a positive vision of diverse, mixed income communities. The County still plans to analyze the County's Compass Housing section for recommendations in this area, and follow up with those recommendations.

Neighborhoods will be encouraged to highlight positive news and events related to fair housing issues at City Council meetings via awards presented to the communities. Awards could be presented on a quarterly basis.

2011 Update

The City's Comprehensive Planning effort, Plan Cincinnati, reached out to many neighborhoods and community leaders. A steering committee of 40 members oversees this effort and includes representation from minority groups, people advocating marginalized residents, and fair housing advocate representatives from the following organizations: Hispanic Chamber of Commerce; Evanston Community Council; Working In Neighborhoods; Avondale Community Council; Housing Opportunities Made Equal; Price Hill Will; the Cincinnati Hispanic Community; Urban Appalachian Council; Hispanic Professional Society; Hispanic Chamber of Commerce; African American Chamber of Commerce; and West End Community Council.

The Chronology of Plan Cincinnati is listed below:

2009 – Planning staff presented individually to all 52 Community Councils

February 2010 – Held Housing Session meetings

February 2010 – December 2011 – Steering Committee meetings

April to December 2010 – Held Working Group meetings – 2 meetings covered housing

January 2011 – Working Group open house

April 2011 – Neighborhood Summit – Housing Sessions including CMHA and Housing Opportunities Made Equal providing handouts at Information Fair)

July to December 2011 – Subgroups of Steering Committee met twice monthly for six months

Housing Section becomes LIVE Section – invited CMHA, WIN, Housing Opportunities Made Equal, and Urban Appalachian Council

March 2012 – Plan Cincinnati Open House – presented draft plan

The First Suburbs initiative is always looking for speakers for their quarterly meetings. The County staff members of the FHAC met with the First Suburbs Executive Committee in the fall of 2011 to discuss providing speakers, or working in concert in some areas.

Housing Opportunities Made Equal obtained small grants from private foundations to sponsor the update of the Stable Integrated Communities research based on the 2010 Census. A number of additional communities, both in the City and jurisdictions outside the City, were found to have been racially integrated for at least 20 years. Housing Opportunities Made Equal published a glossy neighborhood guide highlighting these communities. The City, the County, Housing Opportunities Made Equal, and Bridges for a Just Community organized a Hidden Treasures Forum which was held in November 2011 to discuss the research and share best

practices on building stable, diverse communities. The president of the County Commission and a representative of the City gave awards to the 28 communities.

2012 Update

Plan Cincinnati, the City's first Comprehensive Plan in 30 years was unveiled in March 2012. Discussion occurred throughout the community throughout the year, and the Plan was adopted by the Planning Commission and City Council in December 2012. Plan Cincinnati is a comprehensive document that will serve as a long-range plan to guide and manage growth, protect the environment and influence future development in our City.

Plan Cincinnati is divided into five "initiative areas" listed below:

- Compete: Be the pivotal economic force of the region
- Connect: Bring people and places together
- Live: Strengthen our magnetic city with energized people
- Sustain: Steward resources and ensure long-term viability
- Collaborate: Partner to reach our common goals

A complete copy of the Plan is located at: <http://plancincinnati.org/draft/index.htm>

There is a specific goal and strategy related to fair housing as part of the "Live" section. It is outlined below:

Live - Strengthen our magnetic city with energized people

The key to any successful city is livability. To create and sustain a thriving urban community where local pride and confidence is contagious, we must improve the public life and residential experience for our workforce and residents. People are the most important piece of a society. Our residents must experience a welcoming civic atmosphere and quality, healthy housing.

Live Goal 3: Provide a full spectrum of housing options, and improve housing quality and mobility

To meet the needs and wants of current and future residents, we must strive for a collection of "Neighborhoods of Choice," offering a variety of high quality housing and neighborhood amenities. Cincinnati has an abundance of housing, but its quality varies by neighborhood, and is not always the product people want or that meets their lifestyle. Cincinnati should offer housing products for all levels of income, from affordable to high-end.

Live Strategy - Affirmatively further fair housing

- Fair housing is an ongoing effort in cities across the United States, including Cincinnati. We need to be fair in our housing policies and adhere to fair housing laws that currently exist.
- Continue to enforce fair housing laws with regard to federally protected classes.
- Existing fair housing laws have been in effect for quite some time now. We need to strictly adhere to these laws and support them in order to prevent and stop all housing discrimination practices that are out there.

Short-range goals (1-3 years):

- Fund and support fair housing testing and enforcement activities to mitigate discrimination in housing.

- Practice inclusionary housing policies in accordance with the Fair Housing Action Plan and incorporate these policies into the future Land Development Code.
- Continue to meet the needs of special populations, such as frail elderly, those with physical impairments, developmental disabilities, HIV/AIDS, criminal records, and substance abuse problems.

Mid-range goals (4-7 years):

- Require (or incentivize) all City-funded residential development to follow inclusionary housing policies.
- Require (or incentivize) visitability in city-funded new construction when topographically feasible.

Long-range goals (8-10 years or ongoing):

- Advocate fair housing standards throughout the region.
- Prioritize equity by including a quota for low-income housing units in Transit-Oriented Development.

2013 Update

Six working groups have now formed to implement Plan Cincinnati; these groups are formed around the five goals below and a marketing team:

- Compete: Be the pivotal economic force of the region
- Connect: Bring people and places together
- Live: Strengthen our magnetic city with energized people
- Sustain: Steward resources and ensure long-term viability
- Collaborate: Partner to reach our common goals

2014 Plans

The working groups will continue their implementation efforts.

Timeline: Ongoing

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

The City and County support this recommendation, and welcome assistance from groups such as the Affordable Housing Advocates, the League of Women Voters, and other to help implement it. In 2006, the Affordable Housing Advocates (AHA) created a pledge form, which they had used in the past; however, the pledge has not been pursued because of the proliferation of candidate pledges for various purposes.

2010 Report

No local elections occurred in 2010.

2011 Update

This pledge has not been used due to the proliferation of candidate pledges for various purposes.

2012 Update

In February 2012, a candidate for state representative mailed campaign literature that called people receiving rental subsidies “a cancer that destroys our neighborhoods.” In response, Housing Opportunities Made Equal, Bridges for a Just Community, and the Cincinnati Human Relations Commission issued a public statement on Civility in Political Discourse.

2013 Update

No progress to report.

2014 Plans

No plans to use this pledge.

Timeline: Ongoing

Improve the Choice in the Housing Choice Voucher Program

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

The City currently provides funding to Housing Opportunities Made Equal to provide some assistance to Voucher holders to find units in low poverty areas, and to recruit landlords in these areas. The County had provided funding in the past under its Section 8 Program, but no longer operates that program. It may be difficult to provide additional funding from the City or County due to public service limits on the CDBG Program funds, but that can be explored. The County operates a tenant based assistance program with HOME funds, and recruits landlords for that program. The City, County, and CMHA could form a working group to discuss this collaboration, and explore other funding sources to expand current efforts. The City and County held discussions with CMHA about “Go Section 8,” which is the current tool being used to give clients information about available apartments, and HousingLocator.org.

2010 Report

In 2010, \$55,000 of CDBG was allocated for the Section 8 Mobility program. This program provides placement and transportation services to Section 8 voucher holders to assist them in securing affordable housing in low poverty neighborhoods outside of the City of Cincinnati. In addition to the services mentioned above, Housing Opportunities Made Equal also provides an outreach component to landlords. This program offers housing choices for residents, as one of the recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

2011 Update

In 2011, \$55,000 of CDBG was allocated for the Section 8 Mobility program and the County provided \$24,000 in 2011. The program was expanded to help both city and county residents with vouchers find housing in communities where there is currently little assisted housing, or in low poverty areas.

2012 Update

In 2012, \$47,500 of City CDBG funding and \$24,000 in County CDBG funding was allocated for the Section 8 Mobility program. The City’s CDBG allocation for tenant counseling was reduced due to a two-year cut of 28% in the CDBG program funding. Starting in October 2012, CMHA supported the Mobility program with \$25,000 per year. The Mobility program recruits landlords and provides placement services to Section 8 voucher holders to assist them in moving to low-poverty, non-impacted areas.

2013 Update

In 2013, \$47,500 of City CDBG funding and \$24,000 in County CDBG funding was allocated for the Section 8 Tenant Counseling and Placement Mobility program. CMHA continued funding for this program as well at \$25,000 per year.

2014 Plans

CMHA plans to continue to collaborate with HOME on their mobility program by promoting the program during its briefing sessions for new voucher holders and by referring voucher holders interested in moving to areas with lower concentrations of poverty to the agency. Additionally, CMHA will recruit new property owners to participate in the Housing Choice Voucher program. The agency has also commissioned a county-wide rent study to determine if existing payment standards promote housing choice and affordability in most communities.

In 2014, \$40,375 of City CDBG funding and \$24,000 in County CDBG funding was allocated for the Section 8 Tenant Counseling and Placement Mobility program. CMHA continued funding for this program as well at \$25,000 per year.

Timeline: Ongoing

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

2010 Report

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

The **Affordable Housing Advocates** have recommended the following:

“While current HUD rules permit CMHA to project base up to 20% of its Housing Choice Vouchers (HCV), AHA urges that CMHA limit use of this program to a small percentage of funding. AHA believes CMHA should use Project Based Vouchers strategically to expand housing opportunities. In addition to using the option to geographically expand housing opportunities, CMHA should use it to assist low income households with special needs, who have trouble finding suitable housing with tenant-based vouchers and to promote renovation of good existing affordable housing as a way to improve neighborhoods. CMHA should not use project basing of HCV to limit housing choice.”

2011 Update

The City and County held discussions with CMHA, but did arrive at a conclusion about how to address this. CMHA does not intend to use project based Vouchers to limit housing choice.

This issue was discussed with AHA and Housing Opportunities Made Equal staff. AHA emphasized the last line, “CMHA should not use project basing of HCV to limit housing choice.” Some fair housing advocates insist that allocating vouchers to specific buildings or units always limits choice. CMHA has experienced transitional leadership for several years. They have had an interim Executive Director for several years, and much turnover in the CMHA Board of Directors. It is anticipated that this issue will be discussed in more detail when more permanent leadership is in place.

2012 Update

No updates to provide.

2013 Update

At the first 2013 core group meeting, the new CMHA Executive Director states that CMHA has no plans to limit housing choices. CMHA will not approve the implementation of changing vouchers to project based vouchers if they increase the current impactation rate for a given area. They have two applications pending which are under consideration.

Timeline: Ongoing

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

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

2010 Report

Several fair housing advocates have volunteered to work with City Planning staff on the Housing and Neighborhood Development element of the City's Comprehensive Plan. Fair housing issues will be directly addressed in the plan. City Planning commits to conducting specific outreach to low-income tenants in the Comprehensive Planning process.

CMHA can help to outreach to their clients by: (1) putting information into Tenant Information Packets, (2) adding information to videos that play during recertification meetings, and (3) including links to these community meetings on their website.

The City's Comprehensive Planning effort, **Plan Cincinnati**, reached out to many neighborhoods and community leaders. A steering committee of 40 members oversees this effort and includes representation from minority groups, people advocating marginalized residents, and fair housing advocate representatives from the following organizations: Hispanic Chamber of Commerce; Evanston Community Council; Working In Neighborhoods; Avondale Community Council; Housing Opportunities Made Equal; Price Hill Will; the Cincinnati Hispanic Community; Urban Appalachian Council; Hispanic Professional Society; Hispanic Chamber of Commerce; African American Chamber of Commerce; and West End Community Council.

2011 Update

The **Plan Cincinnati** planning process continued during the year.

2012 Update

Citizen engagement and community outreach continued in the **Plan Cincinnati** comprehensive planning process as outlined above. The City also engaged in a new budgeting process called "**Priority-Driven Budgeting**". This included outreach to over 330 organizations with a series of open discussions, focus groups, and online forums to articulate expectations of city government. Over 240 people attended the 6 open meetings and 8 focus-group meetings with diverse and targeted audiences. One of the focus groups was hosted by

CMHA and included residents and voucher holders. Follow up emails and meetings were held throughout the year to keep stakeholders informed and engaged.

2013 Update

The **Priority-Driven Budgeting** initiative continued to reach out to diverse members with two community based meetings held in July and August.

Timeline: Ongoing

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

2010 Report

The City and County support this recommendation, and have expressed an interest in serving on such a committee. CMHA is finalizing this committee and it will include representatives of the City and the County.

2011 Update

One meeting was held during 2011. CMHA has this specific committee on hold right now, due to legal questions about having CMHA Board members at a meeting not considered public. In the meantime, clients and citizens can access Board members at Board meetings. Also, clients or concerned citizens can attend Manager's night-in, afterhours.

At a meeting with AHA, the City and County discussed idea of having a working group, to deal with other issues that the above mentioned committee would not take on. Some fair housing advocates are frustrated at the amount of time and difficulty involved with establishing an advisory committee, and urges more action by the City and County.

2012 Update

It is anticipated that this issue will be discussed in more detail when more permanent leadership is in place at CMHA. The new CMHA Executive Director announced a series of public meetings called "Community Conversations" in November 2012.

2013 Update

CMHA's new Executive Director explained that they will not establish an advisory committee but instead are implementing "Good Neighbor Agreements" with voucher residents and community groups. They are also implementing "Community Liaisons" for better information sharing amount their residents and the community.

Timeline: Ongoing

Predatory Lending and Lending Discrimination

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

The City and County support this recommendation, and will support initiatives that will assist in this effort. Legal Aid will draft correspondence for sign-on by the City and County to advise the

Prosecutor's Office, Sheriff's Office, area police departments, and the FBI of the need for assertive law enforcement action in this area.

2010 Report

The City allocated \$143,000 in 2010 CDBG funding for this program. Under contract with the Legal Aid Society the program provides up to three months of mortgage payments for low-income City of Cincinnati homeowners facing foreclosure due to predatory lending, job loss, illness, death of the primary wage earner, or other circumstances beyond their control. Homeowners may receive this assistance to bring their loan current if they have reestablished an income stream. All clients in mortgage trouble receive in-depth foreclosure prevention counseling and case management that links them with other social service agencies. This program addresses one of the predatory lending recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

The City has allocated \$276,700 in 2010 HOME funding for the Downpayment Initiative program. The downpayment assistance is used towards the purchase of single family housing by low- to moderate- income owner-occupant families who are first-time homebuyers. Eligible project costs include downpayment and closing costs. Families are counseled on becoming homeowners and all houses inspected. Only traditional mortgage products may be used with this program in order to avoid predatory loan products. This program addresses one of the predatory lending recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

2011 Update

City and County met with the local Community Reinvestment Act representatives in September 2011. These representatives pledged to work on financial issues related to several impediments. As a result of this and larger community efforts, a Financial Fitness Day was scheduled as outlined in 2012 Update below.

The City has allocated \$137,000 in 2011 CDBG funding for the Emergency Mortgage Assistance program. Under contract with the Legal Aid Society the program provides up to three months of mortgage payments for low-income City of Cincinnati homeowners facing foreclosure due to predatory lending, job loss, illness, death of the primary wage earner, or other circumstances beyond their control. Homeowners may receive this assistance to bring their loan current if they have reestablished an income stream. All clients in mortgage trouble receive in-depth foreclosure prevention counseling and case management that links them with other social service agencies. This program addresses one of the predatory lending recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

The County has allocated \$95,000 of 2011 CDBG funding for foreclosure prevention counseling to assist in this area.

The City allocated \$262,458 in 2011 HOME funding for the Downpayment Initiative program.

2012 Update

Cincinnati Mayor Mallory hosted a Financial Education Day on January 28, 2012, at The Public Library of Cincinnati and Hamilton County Main Library. This financial education clinic was provided in partnership with PNC Bank, the Financial Planning Association of Greater Cincinnati, LifeSpan Ohio, Urban League of Greater Cincinnati, Smart-Money, Bank on Greater Cincinnati, United Way, and Working in Neighborhoods. The event featured four educational workshops throughout the day on topics including: Working with Your Bank Account, Managing

Your Credit, Handling Foreclosure, and Tackling Debt. The free event, sponsored by PNC Bank, offers attendees personalized one-on-one financial consultations with certified professionals on to receive financial advice. The event is free and open to anyone interested in free financial advice.

The January 2012 event was staffed by the Financial Planning Association of Greater Cincinnati. In free 15 minute one-on-one private consultations, individuals were able to get advice on tax issues, small business development, investments, retirement planning, health and life insurance, estate planning, foreclosure or many other subjects. The personal consultations were operated on a first-come, first-served basis with no additional strings attached. Individuals did not have to share personal information, and there was no sale of products or services.

As a result of 2011 efforts, a Financial Fitness Day was held on March 10, 2012 sponsored by Fifth Third Bank, Huntington Bank, PNC Bank, U.S. Bank and Xavier University. Programs addressed financial literacy, credit scores, protecting yourself from identify theft, starting your own business, foreclosure prevention, strategies to manage debt and accessing loans.

A Fair Lending Forum was also held on April 5, 2012, at the Federal Reserve Bank Cincinnati branch. This roundtable discussion for housing and lending professionals included discussions on racial disparities as seen in the Home Mortgage Disclosure Act (HMDA) data.

In 2012, The City has allocated \$120,000 in funding for the Emergency Mortgage Assistance program. The County has also allocated CDBG funding for foreclosure prevention counseling to assist in this area. The City also allocated \$250,000 in HOME funding for the Downpayment initiative program which requires new homebuyers to use only traditional financing products.

Additional Funding from Mortgage Settlements

The federal government and 49 state attorney generals have reached a \$25.0 billion agreement with the nation's five largest mortgage servicers to address mortgage loan servicing and foreclosure abuses, provide financial relief to homeowners, and create new homeowners protections. Major servicer violations include: robo-signing affidavits in foreclosure proceedings, deceptive loan modifications, failure to offer alternatives to foreclosure, and filing improper documentation in federal bankruptcy court.

\$20.0 billion will go toward various forms of financial relief to borrowers. Mortgage servicers are required to fulfill these obligations within three years, and are incentivized to provide relief quickly. Servicers must provide at least 75 percent of their targets within the first two years. If servicers miss deadlines they will be required to pay additional cash. In addition to the \$20.0 billion, \$5.0 billion goes to federal and state governments. \$1.5 billion goes to borrowers who have lost their home to sale or foreclosure. The remaining \$3.5 billion goes to federal and state governments to repay public funds lost due to servicer misconduct.

On top of the settlements monetary obligations, the agreement requires new service standards. These standards will prevent foreclosure abuses in the past, such as robo-signing, improper documentation, lost work, and create new consumer protections. Foreclosure will be a last resort, and banks will be restricted from foreclosing while the homeowner is in consideration for a loan modification. Finally, this agreement does not prevent state and federal authorities from pursuing action against criminal conduct related to this or any other misconduct by the servicers.

The State of Ohio is estimated to receive \$335.0 million in monetary relief from the National Mortgage Settlement. This funding will be used to help distressed homeowners stay in their homes through advanced loan modifications, payments for victims of unfair foreclosure practices, supportive counseling, and foreclosure prevention. Attorney General Mike DeWine has divided this money into four categories to be allocated among Ohio's local governments. The first category will give an estimated \$102.0 million in benefits from loan modifications and other direct relief to victims. The second category will give an estimated \$44.0 million to those who have lost their home to foreclosure and suffered servicing abuse between January 1, 2008 and December 12, 2011. The third category will give an estimated \$90.0 million in refinancing loans to Ohio's "underwater" borrowers. Lastly, the fourth category allocates an estimated \$97.0 million to the Attorney General Grant Program for Abandoned and Vacant Property Demolition. Of the \$97.0 million in the Property Demolition fund \$2.0 million will be set aside to expand the Economic Crimes Division of the Ohio Attorney General's Office. These funds will be used to go after criminals who continue foreclosure rescue and debt relief scams, provide training to law enforcement about scams, and increase consumer education efforts to avoid scams.

Cincinnati was hit hard by foreclosures and the negative effects of abandoned buildings, specifically inhibiting economic growth, increased incidents of crime, and depressed home values in the surrounding area. The City received \$3.5 million from the Attorney General Moving Ohio Forward Grant Program for Abandoned and Vacant Property Demolition to address the City's growing problem of foreclosed and abandoned properties. The City provided the required 100% match or \$3.5 million in local matching funds for a total of \$7.0 million in funding for this "Move Ohio Forward" activity.

2013 Update

"Move Ohio Forward" work has begun in earnest and will continue throughout the year. The City has allocated \$100,000 in 2013 CDBG funds for the Emergency Mortgage Assistance program. The County has also allocated CDBG funding for foreclosure prevention counseling to assist in this area. The City has allocated \$250,000 in 2013 HOME funds to the Downpayment Initiative program. The County has allocated \$40,000 of 2013 CDBG funding for foreclosure prevention counseling to assist in this area.

In 2013, the City will also be contracting with Smart Money to provide financial literacy programs to City residents.

2014 Plans

"Move Ohio Forward" will be completed and depending on CDBG grant amounts, the City will allocate funding for the Emergency Mortgage Assistance and Smart Money Financial Literacy programs.

Timeline: Ongoing

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

The City and County support this recommendation. The City and County plan to hold an annual forum for mortgage lenders and brokers, to discuss how they handle and update their review process, and how they will address disparities found. Criteria will be developed for lenders and brokers to present their statistics from HMDA data and address any disparities that may exist.

2011 Update

As mentioned in #9 above, meeting took place with CRA representatives in September 2011 and they pledged to work on financial issues related to several impediments.

2012 Update

As a result of the 2011 efforts, a Financial Fitness Day was held in March 2012. A Fair Lending Forum is being held April 5, 2012, in response to this recommendation. It is sponsored by Housing Opportunities Made Equal, the City, the County, and the Federal Reserve Bank. The planning committee for the event included representatives of some of the largest lenders in the region.

2013 Update

The Mayor's Office offered the second annual Financial Fitness Day is March 2013. The Fair Lending Forum held in 2012 was considered very successful in bringing various parties to the table to discuss lending issues. A group made up of representatives from Housing Opportunities Made Equal, the Federal Reserve Bank, Fifth/Third Bank, PNC Bank, Chase Bank, Hamilton County, and the City of Cincinnati held a follow up meeting on April 6, 2013. The Fair Lending Forum topics included:

- A round table discussion related to fair lending and disparate impact
- Maintenance of bank-owned properties
- Selling practices related to bank-owned properties
- Lending standards in lower-income communities
- Helping low-income residents become homeowners

Timeline: Ongoing

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

The City and County support initiatives to encourage lenders to expand access to lending and banking services. In this time of cutbacks and consolidation, many banks are not expanding facilities, but if they are, we encourage them to consult with the City and County and Fair Housing agencies to determine where branches are needed. In addition, many banking services are accessible through the internet, so education and training in on-line banking could be provided by lenders to increase the accessibility to lower income and minority consumers. The City and County will encourage banks to offer alternative methods of access to low – moderate income and minority households. This discussion could occur at the annual forum with lenders mentioned in the response to #10.

2010 Report

The United Way is coordinating a Financial Stability Coordinating Council Task Force. The purpose of the task force is to work in collaboration with bankers, community-based representatives, local government officials and financial regulators to connect Greater Cincinnati's unbanked and under-banked individuals with appropriate and affordable, mainstream financial services.

Four committees, Financial Education; Product & Services; Tracking & Measurements; and Marketing & Community Outreach, have been working to complete respective tasks. National ad firm, Landor has been secured to provide all design materials pro bono. Surveys of all financial institutions are completed. Thirteen financial institutions & credit unions signed on.

2011 Update

As mentioned in #9 above, meeting took place with CRA representatives in September 2011 – they pledged to work on financial issues related to several impediments.

2012 Update

As explained in #9 above, as a result of the 2011 efforts, a Financial Fitness Day was held in March 2012.

2013 Update

As mentioned in #9 above, the City will be contracting with Smart Money to provide financial literacy programs to City residents in 2013.

Timeline: Ongoing

Discrimination Against People with Mental Disabilities

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

The City and County support this recommendation. Currently, training is provided by Housing Opportunities Made Equal to County personnel as needed. This effort could be expanded to include more County staff, City staff, and staff of other local zoning boards.

2011 Update

On April 26, 2011, fair housing training was provided for City and County Employees. Topics included introduction to fair housing laws, testing procedures, hot topics including harassment, discrimination against families, reasonable accommodation requirements, and accessibility issues. The training also addressed local government liability issues including exclusionary zoning, targeted enforcement, and affirmatively furthering fair housing. Thirty representatives were there from the Cincinnati property management and code enforcement staff, Cincinnati Police Department, Cincinnati Health Department, City Planning and Buildings Department, and City and County Community Development Departments.

The Hamilton County Regional Planning Commission provides a range of training for local zoning commissioners. Fair housing training specifically related to zoning issues will be included in their course offerings.

2012 Update

Housing Opportunities Made Equal provided training to City and County staff in smaller groups, one department or division at a time.

2013 Update

Housing Opportunities Made Equal provided training to City and County staff through the Ohio Kentucky Indiana Regional Council of Governments in May 2013.

Timeline: Ongoing

13) The City Planning and Buildings Department and Hamilton County Regional Planning Commission should provide sighting assistance programs that enable the sighting of special

needs housing by providing community education, dispute resolution services, and tools such as Good Neighbor Agreements.

The City and County support this recommendation, and welcome assistance from the Fair Housing Committee and the corresponding departments to help implement this initiative. The Planning Partnership meets annually and sighting assistance could be discussed as a training topic. The City and County could provide awareness coaching to the communities, non-profits, and developers.

2013 Update

No updates to provide.

Timeline: Begin 2014

A Lack of Accessible Housing

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

The City of Cincinnati has taken several steps to address this impediment. In 1998 the City Council established the Cincinnati Accessibility Board of Advisors to consider and make recommendations to the City Manager on issues of accessibility for disabled persons related to future public projects within the City. Ordinance 0239-2009 was approved September 2, 2009 to broaden the purpose of the advisory committee to include making recommendations to the City Manager on all general matters of accessibility for disabled persons within the City. The City's Senior Buildings Plans Examiner, from the Department of Planning and Buildings, participates with this committee in an ongoing capacity as it works to identify mobility issues and solutions.

In 2009 Housing Opportunities Made Equal held training for Hamilton County staff from the divisions of Community Development, Planning, and Building Inspection to review Fair Housing laws. In January 2010, a more specific training was held with County Building Inspection staff to review the specific requirements related to accessibility. Plans are underway to hold this specific training for existing Building Inspections staff on a bi-annual basis, with trainings held more frequently for new staff.

The City has begun scheduling fair housing training that began April 30, 2010 and invited the Mayor, members of the City Council, and staff from departments such as Community Development. This comprehensive training covers housing for people with disabilities including accessibility requirements for new construction. Appropriate staff of the Department of Planning and Buildings attended this training in 2011 by certified trainers. The City is considering offering this on a bi-annual basis. It specifically covers the Fair Housing Act design and construction requirements for new multifamily buildings.

2011 Update

In 2011 the Department of Planning and Buildings was allocated \$9,000 in funding for the following:

- Books on the ADA were purchased and made available for use by all Inspectors, Plan Examiners and the general public.
- Three days of training were provided May 17, 18, and 19, 2011 at the City's Permit Center and in Sharonville on the accessibility requirements for the Fair Housing Act. More than 200 people attended the training about the latest ADA Codes and Standards. Attendees included eight staff from Hamilton County and most of the jurisdictions around the City.

2012 Update

Additional Funding Provided

The City Planning Department received \$27,300 of additional funding to meet the following accessibility objectives:

- Educate staff
- Add books for staff and library
- Update website
- Provide educational programs for design professionals in Cincinnati
- Improve enforcement of codes and standards
- Promote accessibility program in the City
- Work with the Cincinnati Accessibility Board of Advisors (CABA)
- Reduce liability to the city

Visitability Task Force Report Supported

In 2011, City Council appointed a Visitability Task Force which addressed these issues and made a report and recommendations in July 2012. City Council Communication #201201088 and Motion #201201125 both reference and encourage the City to develop processes to increase Visitability for the impaired.

The summary of this report is inserted below:

In the fall of 2011, the Livable Communities Committee created a Visitability Task Force established to make a recommendation to City Council regarding the improvement and promotion of Visitable and accessible construction in the City of Cincinnati. In general, a Visitable residence is designed to be accessible to people who use wheelchairs, walkers, or struggle with steps. Specifically, a Visitable home has minimally a zero-step entrance, wide interior doors, and a wheel-chair friendly half-bathroom on the main floor. The need for Visitable and universally-designed housing has been identified in Plan Cincinnati and is supported by changing demographics, an aging population, and a desire to create an inclusive community.

The Visitability Task Force made several recommendations aimed at increasing the number of Visitable homes in Cincinnati. A Motion was made by City Council to adopt these recommendations.

Recommendation 1 - Extend the Community Reinvestment Act (CRA) Tax Abatement from ten years to twelve years: Studies have shown that the cost differential between a Visitable and a non-Visitable unit is less than \$300 (AARP Public Policy Institute, 2008). The Administration recognizes that developing Visitable housing is an uncommon approach for many homebuilders. Incentives such as Tax Abatements will likely result in builders gaining more experience, testing new markets, and ultimately increasing the supply of Visitable housing in Cincinnati. However, the recommendation of City Council conflicts with the Ohio Law. Revised Code 3735.67 does not permit the City to offer Tax Abatements in excess of ten years for renovation of one- and two-family housing. This limits

applicability of the Tax Abatement for Visitability to new construction and renovation of buildings with three or more units.

Recommendations 2, 3 and 4 – Community Development shall develop a Visitability Tool Kit, to promote Visitability, while partnering with various organizations including the Cincinnati Board of Realtors, the Home Builders Association of Greater Cincinnati, and the Center for Independent Living Options. Implementation of the program will require the development of standards to certify units as VISIBLE. Additionally, there is a need to train staff and City contractors and develop a system for inspecting and monitoring units that claim the Tax Abatement. Funding resources will need to be identified to: implement the program; pay for staff oversight hours; and potentially fund independent contractors to assist with unit certification and monitoring.

Recommendation 5 – The City shall encourage the state legislature to provide additional tax incentives: The Administration will support this effort.

Recommendation 6 – Work with the Hamilton County Auditor to include Visitability requirements on property reports: The Administration will contact the Hamilton County Auditor and begin this discussion. However, the City cannot guarantee what the Auditor's property reports will contain.

Recommendation 7 – City Planning and Buildings shall incorporate Visitability into development codes. The Department of Planning and Buildings has initiated a code diagnostic with their Land Development Code consultants to determine opportunities that would incorporate Visitability Standards into future developments and rehabilitation. The most feasible entry point for VISIBLE Tax Abatement approval would be as contractors seek permits and outline the development specifications.

The Administration recommended that City Council adopt most of the recommendations of the Visitability Task Force and implement twelve-year Tax Abatements for newly-constructed VISIBLE housing and for three-unit remodeled VISIBLE housing. The Administration also recommended that City Council identify a funding source to develop and implement a Visitability incentive program. The Administration did not recommend the issuance of Tax Abatements beyond ten years for renovations of one- and two-family dwellings due to the current conflict with the Ohio Revised Code.

CitiRama Event Needs Improvements

Accessibility advocates have been encouraging the City to promote and provide more accessible features in housing. The accessibility advocates have pointed out the CitiRama, a program the City sponsors encouraging new housing construction in established neighborhoods through private builders, had no accessible or visitable homes in its 2012 program. They contend even the site presented challenges to people in wheelchairs. The accessibility advocates state the housing should be constructed with at least minimum accessibility. This will be addressed and corrected in future CitiRama events.

2013 Plans

The recommendations of the Visitability Task Force will be reviewed for implementation.

2014 Plans

CitiRama 2014 will address the needed visitability issues.

Timeline: Ongoing

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

The City and County support this recommendation.

2010 Report

The County worked with organizations that assist renters with disabilities to determine need, scope, and final program design, and kicked off the program in September 2010. The County provided \$100,000 of 2010 CDBG funds for a program to provide grant funds for accessibility modifications for low income renters.

2011 Update

The County provided \$100,000 of 2011 CDBG funds accessibility modifications.

2012 Update

The County has committed \$25,000 in 2012 CDBG funding for accessibility modifications.

2013 Update

The County has committed \$25,000 in 2013 CDBG funding for accessibility modifications.

Timeline: Ongoing

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

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

2010 Report

The County currently encourages use of HousingLocator.org for clients in the Tenant Based Rental Assistance Program, which can note this in the database. Accessboard.gov is an additional site for assistance. CMHA is using a new service for their listings called "Go Section 8." A campaign has been launched for this new website. The free website allows the landlord to upload their information on available housing. CMHA has begun promotion of "Go Section 8" by disseminating information to clients, including in Mover Briefings, and putting brochures in their front lobby kiosk.

2011 Update

In 2011 \$500,000 of HOME funding was allocated to continue a contract to Hamilton County Community Development to operate and provide Tenant Based Rental Assistance (TBRA) to eligible households within the City of Cincinnati. The TBRA will cover a portion of the household rent payment for client households. The program is marketed to persons with disabilities. This program addresses one of the recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio relative to the lack of accessible housing.

2012 Update

The City allocated \$400,000 for the TBRA program due to HOME program reductions of 52% in the past two years of funding, the City is reevaluating the funding level of the TBRA program.

2013 Plans

The City Council appropriated \$400,000 for the TBRA program in the 2013.

2014 Plans

The Action Plan includes \$340,000 for the TBRA program in the 2014.

Timeline: Ongoing

Discrimination against Families with Children

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

The City and County support this recommendation. The Hamilton County Auditor tracks owner occupancy versus rentals for tax discount purposes, so this information could be used to help pinpoint owners of rental properties for educational mailings.

2010 Update

Proclamations were issued and special attention was paid to this issue during Fair Housing Month. Flyers/brochures were placed at different locations such as the Department of Community Development, City Planning and Buildings, the Permit Center, and the Hamilton County Administration Building on an ongoing basis.

Currently there is training being provided for landlords. The City and County should meet to strategize on how to market and educate the community on fair housing laws. Some ideas that could be considered are showcasing this information on the “Gems of the Queen City” CitiCable show, or on other television shows or other social media. The City and County will work with Housing Opportunities Made Equal to coordinate this to begin in 2011.

2011 Update

Housing Opportunities Made Equal provided training to landlords via the Real Estate Investors Association (REIA) meetings on an annual basis. Additional training is available free of charge to individuals or organizations. In response to an increase in the number of complaints in 2011, Housing Opportunities Made Equal implemented a radio campaign to increase awareness of discrimination against families with children and the closely related issue of sexual discrimination.

2012 Update

No updates to include.

2013 Update

The County staff administering Tenant Based Rental Assistance added discrimination awareness training to those people receiving TBRA. The City and County directed the Strategies to End Homelessness, formerly Cincinnati Continuum of Care, to add this training to their programs assisting individuals and families transitioning from shelters to rental housing.

2014 Plans

Additional public relations opportunities will be explored, including CitiCable shows.

Timeline: Ongoing

Sexual Harassment

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

The City and County support this recommendation. Input from the Fair Housing Committee is now being evaluated and will be added to this response.

2010 Report

The City of Cincinnati allocated \$214,500 in 2010 CDBG funding to carry out its fair housing activities. This will be under contract with Housing Opportunities Made Equal to promote equal housing opportunities for all home seekers regardless of race, sex, color, nationality, religion, handicap, or familial status and to reduce unlawful discrimination in housing and increase integration throughout Cincinnati's neighborhoods. The program does complaint intake, investigation, counseling, and files legal complaints against persons, firms, or organizations suspected of discrimination in housing. This program addresses many of the resolutions of illegal practices recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio. The County provides \$75,000 of CDBG funding to Housing Opportunities Made Equal each year to fund similar activities.

In 2010 the City also allocated \$187,000 in CDBG funding for the Tenant Representation Project (TRP) administered by the Legal Aid Society. The project provides legal representation for low and moderate-income tenants in the City of Cincinnati. The TRP prevents homelessness by stopping unlawful evictions, corrects illegal lockouts and utility shutoffs, and requires landlords to complete repairs to make rental units decent, safe, and sanitary. The project also prevents retaliation against tenants who ask the City Building and Health Departments to inspect for code violations. This program addresses one of the illegal practices recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

Housing Opportunities Made Equal launched for the first time a radio campaign on the topic of sexual harassment. CMHA offers education during their Housing Choice Vouchers (HVC) briefings on the issue. CMHA also suggested they could add information about this into the Fair Housing section of their Tenant Handbook that is given to clients at the initial Briefing.

Housing Opportunities Made Equal should provide ongoing training to the Police Department on sexual harassment, due to the number of complaint calls they receive on the issue. Police officers will learn to refer women to Housing Opportunities Made Equal if the complaint involves housing, but is not criminal.

The County of City should take the initiative to ask Sheriff or police departments to invite Housing Opportunities Made Equal to provide training. Housing Opportunities Made Equal has lost touch with police officers and needs to re-establish a relationship.

2011 Update

The City allocated \$214,500 in 2011 of CDBG funding, and the County allocated \$75,000 in CDBG funding to carry out fair housing activities contractually with Housing Opportunities Made Equal. The City also allocated \$187,000 of CDBG funding for the Tenant Representation Project (TRP) administered by the Legal Aid Society.

As mentioned above, Housing Opportunities Made Equal provides training to landlords via the Real Estate Investors Association (REIA) meetings on an annual basis. Additional training is available free of charge to individuals or organizations. In response to an increase in the number of complaints in 2011, Housing Opportunities Made Equal implemented a radio campaign to increase awareness of discrimination against families with children and the closely related issue of sexual discrimination.

2012 Update

The City allocated \$185,000 in 2012 of CDBG funding, and the County will allocate \$75,000 in CDBG funding to carry out fair housing activities contractually with Housing Opportunities Made Equal. The City allocated \$150,000 of CDBG funding for the Tenant Representation Project (TRP) administered by the Legal Aid Society.

2013 Plans

Fair Housing - The City allocated \$185,000 in CDBG funding in 2013 and the County allocated \$75,000 in CDBG funding to carry out fair housing activities contractually with Housing Opportunities Made Equal.

Tenant Representation - The City also allocated \$150,000 of CDBG funding in 2013.

The County staff administering Tenant Based Rental Assistance will add this discrimination awareness training to those people receiving TBRA. The City and County will direct the Strategies to End Homelessness, formerly Cincinnati Continuum of Care, to add this training to their programs assisting individuals and families transitioning from shelters to rental housing. Additional public relations opportunities will be explored, including CitiCable shows.

2014 Plans

Fair Housing - The City allocated \$157,250 of CDBG funding for 2014 given projected budget cuts. The County allocated \$75,000 in CDBG funding to carry out fair housing activities contractually with Housing Opportunities Made Equal.

Tenant Representation - The City also allocated \$127,500 of CDBG funding for 2014.

Timeline: Ongoing

Conclusion

These recommendations will be reviewed quarterly by City and County staff in a formal setting to track progress in each of the areas of the Fair Housing Action Plan. Staff will convene the Fair Housing Advisory Committee as needed to add additional input on progress, and formulate new or change existing recommendations. Formal reporting to HUD will be done on an annual basis in conjunction with the CAPER and Action Plan.

2014 Annual Action Plan Attachment 4

2014 Recommended Action Plan and Con Plan Results to Date by Objective and Program

Housing Objectives

Strategic Housing Initiatives Program

The Strategic Housing Initiatives program provides for targeted investments in housing projects consisting of at least four housing units throughout the City's neighborhoods with a primary emphasis on homeownership opportunities.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$420,000	\$420,000	7	Housing Units	74	69
HOME	\$0	\$341,731	5			

Homeowner Rehab Loan Program

The Homeowner Rehab Loan program (HRLP) provided low-interest deferred loans and lead grants to low and moderate-income homeowners to correct building code violations; improve accessibility; enhance emergency conservation; and stabilize safe, sanitary housing citywide. This activity provides for loan servicing only as the City reevaluates the program. This program covers the cost of servicing 300 to 400 past loans.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$40,000	\$40,000	0	Loans	0	0

Housing Repair Services

Housing Repair Services provide grants for emergency and critical repairs to very low-income homeowners. Emergency Services are limited to two emergencies per household per year and have a maximum of \$2,500. Critical repairs are those needed for the safety of the client and have a maximum of \$10,000. This program also provides forgivable loans and grants to low income, elderly homeowners to correct code violations issued pursuant to Neighborhood Enhancement Program exterior inspections.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$1,868,685	\$1,868,685	1,190	Housing Units	7,155	5,015

Emergency Mortgage Assistance

The Emergency Mortgage Assistance program provides up to three months of mortgage payments for low-income City of Cincinnati homeowners facing foreclosure due to job loss, illness, death of the primary wage earner, or other circumstances beyond their control. Homeowners may receive this assistance to bring their loan current if they have reestablished an income stream. All clients in mortgage trouble receive in-depth foreclosure prevention counseling and case management that links them with other social service agencies.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$100,000	\$98,000	102	Households	225	236

Compliance Assistance Repair for the Elderly (CARE)

The CARE program provides forgivable loans and grants to low income, elderly homeowners to correct code violations issued pursuant to a Neighborhood Enhancement Program, "house to house" exterior property condition inspection and code enforcement action. Owner occupants would receive financial assistance in correcting common exterior code violations such as leaking roof; dilapidated porch; unsafe stairs; defective siding; painting and similar repairs required under the Cincinnati Housing Code. Program was funded in 2010 and 2014.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$0	\$131,245	12	Households	85	67

2014 Recommended Action Plan and Con Plan Results to Date by Objective and Program

Single Family Homeownership Development-Cincinnati Habitat for Humanity

The program is designed to reimburse Habitat for Humanity for water and sewer tap fees, building permit fees, water permit fees, remote meter fees, a developer fee and other approved fees related to the construction of eligible new single family dwellings. The program also includes eligible infrastructure and construction costs for newly constructed or rehabilitated units, demolition costs, construction modifications to blend units with existing neighborhood styles or address accessibility issues, and homebuyer assistance.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
HOME	\$220,000	\$220,000	6	Housing Units	41	29

Downpayment Initiative

The Downpayment Initiative program funds down payment assistance, which is used towards the purchase of single family housing by low- to moderate-income owner-occupant families who are first-time homebuyers. Eligible project costs include down payment and closing costs.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
HOME	\$250,000	\$203,125	33	Households	203	171

Rental Rehabilitation Program

The purpose of the Rental Rehabilitation Program is to increase the number of renovated rental housing units available to low-income families. Owners of housing units may receive up to 50% of the cost of rehabilitating a housing unit in the form of a deferred, forgivable loan as long as the housing unit remains available to low-income families for at least five years.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$100,000	\$100,000	30	Housing Units	247	215
HOME	\$640,000	\$580,277				

Code Enforcement Relocation

This project allows the City of Cincinnati to pay the first month's rent or security deposit for persons moving to decent, safe and sanitary housing who have been displaced by code enforcement and/or the hazards of lead paint. Staff take applications from low-income persons and provide vacancy lists and management company lists to clients. Qualified participants receive up to \$650 for rental assistance and moving costs.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$50,000	\$50,000	75	Households	748	504

Tenant Representation

The Tenant Representation Project (TRP) administered by the Legal Aid Society provides legal representation for low and moderate-income tenants in the City of Cincinnati. The TRP prevents homelessness by stopping unlawful evictions, corrects illegal lockouts and utility shutoffs, and requires landlords to complete repairs to make rental units decent, safe, and sanitary. The project also prevents retaliation against tenants who ask the City's Code Enforcement and Health Departments to inspect for code violations.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$150,000	\$147,000	375	People	2,466	2,084

2014 Recommended Action Plan and Con Plan Results to Date by Objective and Program

Section 8 Mobility Program

The Section 8 Mobility Program (formerly Section 8 Tenant Counseling and Placement) provides placement services to Section 8 voucher holders to assist them in securing affordable housing in low poverty neighborhoods. In addition to the services mentioned above, Housing Opportunities Made Equal (H.O.M.E.) also provides an outreach component to landlords.

Funding Source	Approved	Recommended	2014 Goal	2010-2014 Accomplishments		
	2013	2014		Indicator	Proposed	Completed
CDBG	\$47,500	\$40,375	35	Households	200	291

Tenant Based Rental Assistance (TBRA)

The Hamilton County Department of Community Development will operate and provide Tenant Based Rental Assistance (TBRA) to eligible households within the City of Cincinnati. The TBRA will cover a portion of the household rent payment for each household over a 12-month period.

Funding Source	Approved	Recommended	2014 Goal	2010-2014 Accomplishments		
	2013	2014		Indicator	Proposed	Completed
HOME	\$400,000	\$400,000	57	Households	278	163

Fair Housing Services

The City contracts with Housing Opportunities Made Equal (H.O.M.E.) to promote equal housing opportunities for all home seekers regardless of race, sex, color, nationality, religion, handicap, or familial status and to reduce unlawful discrimination in housing and increase integration throughout Cincinnati's neighborhoods. The program does complaint intake, investigation, counseling, and files legal complaints against persons, firms, or organizations suspected of discrimination in housing.

Funding Source	Approved	Recommended	2014 Goal	2010-2014 Accomplishments		
	2013	2014		Indicator	Proposed	Completed
CDBG	\$185,000	\$167,060	857	People	4,904	4,158

Other Community Needs

Neighborhood Business District (NBD) Improvement Program

The Neighborhood Business District Improvement program enhances the business environment in the City's NBDs by constructing streetscape public improvements, infrastructure improvements, property acquisition, or other development activities.

Funding Source	Approved	Recommended	2014 Goal	2010-2014 Accomplishments		
	2013	2014		Indicator	Proposed	Completed
CDBG	\$920,000	\$920,000	58	Businesses	313	517

Strategic Program for Urban Redevelopment/GO Cincinnati

The Strategic Program for Urban Redevelopment/GO Cincinnati Program facilitates the redevelopment of abandoned, vacant, or underutilized industrial and commercial sites where expansion or redevelopment may be complicated by environmental contamination. The funds will be used to acquire property, remediate contamination, construct public improvements, and perform activities to facilitate redevelopment of brownfield sites.

Funding Source	Approved	Recommended	2014 Goal	2010-2014 Accomplishments		
	2013	2014		Indicator	Proposed	Completed
CDBG	\$570,000	\$555,000	2	Acres	9	17

2014 Recommended Action Plan and Con Plan Results to Date by Objective and Program

Small Business Services & Technical Assistance

The Small Business Services and Technical Assistance Program supports a system of accessible technical assistance to meet the start-up and growth needs of micro-enterprises and small businesses. Programs and services provided include capacity development, business education and coaching, entrepreneurial training, incubation and technical assistance in the form of loan packaging, accounting services, legal services, appraisals, environmental assessments, and inventory control audits.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments		
				Indicator	Proposed	Completed
CDBG	\$140,000	\$126,000	75	Businesses	668	926

Small Business Loan Fund

The Cincinnati Small Business Loan Fund (CSBLF) is a revolving loan program that is used to fill financing gaps for small to mid-sized businesses located in the City of Cincinnati. These businesses must create or retain jobs for City residents, or provide benefit to residents of low and moderate-income neighborhoods.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments		
				Indicator	Proposed	Completed
CDBG	\$100,000	\$90,000	3	Jobs	22	20

Corporation for Findlay Market

The Corporation for Findlay Market (CFM) has entered into a management agreement with the City of Cincinnati to assume responsibility for management and leasing of Findlay Market facilities. In 2010 to 2013, the funds were used to recruit new small businesses to the Market, develop existing businesses, and support daily operations of the facilities. In 2014, funding will be used in two programs - \$168,00 for Nonprofit Capacity Building and \$28,000 for the urban gardens.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments		
				Indicator	Proposed	Completed
CDBG	\$497,250	\$196,000	1	Organizations	5	4

Earned Income Tax Credit Outreach and Financial Literacy

The purpose of the Earned Income Tax Credit Outreach and Financial Literacy Program is to improve the quality of life for low-income taxpayers who live in Cincinnati by expanding their awareness of the Federal Earned Income Tax Credit, by providing increased access to free tax preparation and filing services, and by facilitating programs to enhance their financial literacy.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments		
				Indicator	Proposed	Completed
CDBG	\$2,000	\$1,700	766	People	11,576	9,925

Neighborhood Capacity Building & Technical Assistance

The Neighborhood Capacity Building and Technical Assistance Program is designed to build and strengthen the capacity of Community Development Corporations (CDCs) through three principal activities: 1. Supporting neighborhood-based CDCs by providing operating funds; 2. Providing technical assistance and training to CDCs; and 3. Providing administrative oversight of the programs.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments		
				Indicator	Proposed	Completed
CDBG	\$320,000	\$320,000	10	Organizations	50	31
HOME	\$110,000	\$110,000	3	Organizations	23	16

2014 Recommended Action Plan and Con Plan Results to Date by Objective and Program

Blueprint for Success

The Blueprint for Success Program is based on the Youth Build model, to assist ex-offenders and at-risk young adults ages 16-30 in obtaining their high school diploma or GED as well as marketable construction skills. Participants will be trained in all aspects of residential construction through the rehabilitation. Housing repair costs now included in CARE above.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$237,910	\$82,874	29	People	199	106

Youth Employment Programs

The Youth Employment Program trains youth in the areas of work place etiquette and basic work skills by utilizing workshops, presentations, and on the job experiences. The program provides youth with opportunities to explore their interests and career options in public and private employment options.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$960,000	\$960,000	350	People	2,042	2,284

Financial and Credit Union Services

Financial and Credit Union Services provides support for SmartMoney Program. SmartMoney provides economic education and financial counseling services to low-income residents. This program was added in 2013.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$110,000	\$55,000	255	People	555	0

Quality of Life

Concentrated Code Enforcement

Inspections of homes and businesses are conducted in targeted areas and areas in transition. Corrections achieved through Concentrated Code Enforcement involve repairing porches, windows, and siding; painting; and removal of dilapidated garages, fences and sheds, junk cars and weeds. Owners receiving orders are informed of funding availability through the Department of Community Development to correct violations. This program provides for complaint driven inspections of unsafe conditions in targeted areas as well.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$575,000	\$575,000	3,880	Housing Units	19,400	17,837

Hazard Abatement Program

The mission of the Hazard Abatement Program is the preservation of the public health, safety, and welfare through demolition and barricading or repair of abandoned buildings as well as one-time site restoration after demolition. Demolition site restoration will involve installing ground cover, shrubs, trees or natural landscaping or other low maintenance landscaping treatment. The Barricade Program was initiated in 1993 for the purpose of securing vacant abandoned buildings against entry by trespassers. Under the Hazard Abatement Program, condemned buildings citywide are demolished or repaired after normal code enforcement activities have been exhausted.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$800,000	\$1,150,000	600	Housing Units	2,364	2,864

2014 Recommended Action Plan and Con Plan Results to Date by Objective and Program

Millcreek Greenway Restoration

The Mill Creek Greenway Restoration Program creates a greenway system within the riverine-riparian corridor of the Mill Creek. This project provides planning and coordination services for greenway projects, volunteer recruitment for cleanup, and environment enhancing projects. The project's goals are to create innovative and sustainable greenway trails, parks, and other amenities within the riparian corridor of the Mill Creek and help revitalize neighborhoods located near the river's floodplain.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$85,000	\$72,250	1	Public Facilities	5	4

Lead Hazard Testing Program

The Lead Hazard Testing Program provides funding for lead inspections of residences occupied by children who have been identified as having an elevated blood lead level (EBL). The State of Ohio has lowered the blood lead criteria level, which requires intervention to 15 ug/dl of blood. In addition, the program responds to complaints from households where a child may be exposed to lead but has not yet been diagnosed. The program then provides access to services to remediate lead and to healthy homes inspections. The program also provides outreach, education and case management follow up including home visits.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$510,000	\$495,550	100	People	500	288

Future Blooms

The Future Blooms Program focuses on enhancing the aesthetics' of Neighborhood Enhancement Program focus areas and other targeted areas by painting windows and doors on boarded up buildings, and improving vacant lots by growing grass, adding trees where appropriate, and using a fence to define the space as a "Future Blooms" project. In addition, in 2011 this program will start an Urban Farming employment training program to provide sustainable employment options to low-income individuals and encourage productive use of vacant land within the City.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$185,000	\$185,000	5,060	People	25,300	20,240

Historic Structures Stabilization

The Historic Structures Stabilization Program would abate public nuisance conditions and stabilize historic properties. Under Ohio Law if there is a historic building that is deemed a public nuisance, the City has the right to take action to abate the public nuisance conditions without taking ownership of the property. The City would use this right under the law to maintain the public health, safety, and welfare while at the same time preserve the historic structures for potential future rehabilitation. This program was not funded in 2010.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$220,000	\$210,000	1.5	Housing Units	17	9

Drug Elimination Program

The Drug Elimination Program provides funding for increased law enforcement activity in Over-the-Rhine. These officers engage in drug enforcement activities, including investigation, surveillance, and arrest of drug traffickers. It is anticipated that these enforcement activities will also lead to the arrests of criminals for offenses other than and/or related to drug trafficking and abuse.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
CDBG	\$85,000	\$72,250	5,338	People	26,690	23,113

2014 Recommended Action Plan and Con Plan Results to Date by Objective and Program

Homeless Housing / Special Populations Housing

Homeless to Homes - Permanent Supportive Housing

The Homeless to Homes Permanent Supportive Housing Program will provide partial financing for the construction or rehabilitation of new transitional housing units and new permanent supportive housing units. Major project, Anna Louise Inn, delayed due to court litigation.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
HOME	\$543,352	\$167,007	14	Housing Units	221	0

Emergency Solutions Grant - Homeless Shelters & Other Homeless Housing

This activity funds the operation of emergency shelter facilities as well as essential services for the residents.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
ESG	\$450,000	\$450,000	4,441	Households	21,539	15,544

Emergency Solutions Grant - Homelessness Prevention

This activity includes the funding of a shelter diversion program that will serve individuals and families at risk of homelessness by providing Housing Relocation and Stabilization Services as well as Tenant Based Rental Assistance.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
ESG	\$491,345	\$397,281	127	Households	577	307

Caracole House

Since 1993, Caracole has been the City's provider of Shelter Plus Care tenant-based rental assistance for homeless persons with HIV/AIDS through HUD's Continuum of Care funding process. The Shelter Plus Care program will continue to provide subsidies for homeless individuals and families with HIV/AIDS and HOPWA funds will, in part, match the value of those subsidies with outreach services, case management, supportive services for clients, additional tenant based rental assistance, and housing placement services.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
HOPWA	\$599,905	\$494,480	159	Households	775	656

Cincinnati Center for Respite Care

The Cincinnati Center for Respite Care (15 beds/ES individuals) program provides emergency shelter for homeless persons who require medical care not available within a regular shelter bed. Services include 24-hour residential, recuperative adult care services for homeless men and women clients. Clients are referred from shelters through the Health Resource Center clinic or the Medical Van, from hospital emergency rooms, and from inpatient units of various hospitals in Greater Cincinnati. About 14% of Center for Respite Care's population is HIV positive.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments Indicator	Proposed	Completed
HOPWA	\$34,000	\$28,913	25	Households	84	389

2014 Recommended Action Plan and Con Plan Results to Date by Objective and Program

Northern Ky. Independent Health District

These short-term rent/mortgage/utility funds assist individuals and families with HIV/AIDS throughout Northern Kentucky in remaining in independent living situations and maintaining their existing housing. This funding provides for assistance in locating and securing housing when persons with HIV/AIDS are homeless. Due to the absence of an application from any Indiana-based HOPWA provider, the Northern Kentucky District Health Department receives funds designated specifically for providing assistance to eligible clients living within the Indiana counties of Cincinnati's EMSA.

Funding Source	Approved 2013	Recommended 2014	2014 Goal	2010-2014 Accomplishments		
				Indicator	Proposed	Completed
HOPWA	\$155,695	\$129,067	145	Households	719	489

2014 Annual Action Plan Attachment 5
Community Development Block Grant (CDBG) by Goal and Objective

	2013 Approved	2014 Award
Housing Objectives		
Homeownership Housing Development		
Strategic Housing Initiatives Program	\$420,000	\$420,000
Homeowner Rehab Loan Program	\$40,000	\$40,000
Homeownership Total	\$460,000	\$460,000
Homeownership Supportive Services		
Housing Repair Services	\$1,868,685	\$1,868,685
Emergency Mortgage Assistance	\$100,000	\$98,000
Compliance Assistance Repairs for the Elderly (CARE)	\$0	\$131,245
Homeownership Supportive Services Total	\$1,968,685	\$2,097,930
Rental Housing Development		
Rental Rehabilitation Program	\$100,000	\$100,000
Rental Housing Total	\$100,000	\$100,000
Renters Supportive Services		
Code Enforcement Relocation	\$50,000	\$50,000
Tenant Representation	\$150,000	\$147,000
Section 8 Mobility Program	\$47,500	\$40,375
Renters Supportive Services Total	\$247,500	\$237,375
Promote Fair Housing		
Fair Housing Services	\$185,000	\$167,060
Fair Housing Total	\$185,000	\$167,060
TOTAL HOUSING DEVELOPMENT	\$2,961,185	\$3,062,365
Other Community Needs		
Economic Development		
Promote Commercial and Industrial Development/Redevelopment		
NBD Improvement Program	\$920,000	\$920,000
Commercial and Industrial Development Total	\$920,000	\$920,000
Industrial Site Redevelopment/SPUR		
Strategic Program for Urban Redevelopment/GO Cincinnati	\$570,000	\$555,000
Industrial Site Redevelopment/SPUR Total	\$570,000	\$555,000
Promote Business Development Opportunities		
Small Business Services & Technical Assistance	\$140,000	\$126,000
Small Business Loan Fund (CSBLF)	\$100,000	\$90,000
Corporation for Findlay Market (CFFM) - Safe & Clean	\$497,250	\$168,000
Corporation for Findlay Market (CFFM) - Urban Gardens		\$28,000
Financial & Credit Union Services	\$110,000	\$55,000
Earned Income Tax Credit Outreach and Financial Literacy	\$2,000	\$1,700
Neighborhood Capacity Building & Technical Assistance	\$320,000	\$320,000
Business Development Opportunities Total	\$1,169,250	\$788,700
	2013 Approved	2014 Proposed

Job Training, Placement Services, and Employment Opportunities

Blueprint for Success	\$97,503	\$82,875
Youth Employment Programs	\$960,000	\$960,000
Job Training and Placement Total	\$1,057,503	\$1,042,875

<i>TOTAL ECONOMIC DEVELOPMENT</i>	\$3,716,753	\$3,306,575
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Quality of Life**Slum & Blight Elimination**

Concentrated Code Enforcement	\$575,000	\$575,000
Hazard Abatement Program	\$800,000	\$1,150,000
Millcreek Greenway Restoration	\$85,000	\$78,000
Lead Hazard Testing Program	\$510,000	\$495,000
Future Blooms	\$185,000	\$185,000
Historic Structures Stabilization	\$220,000	\$210,000
Slum & Blight Elimination Total	\$2,375,000	\$2,693,000

Citizen Safety

Drug Elimination Program	\$85,000	\$72,250
Citizen Safety Total	\$85,000	\$72,250

<i>TOTAL QUALITY OF LIFE</i>	\$2,460,000	\$2,765,250
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<i>PROJECTS TOTAL</i>	\$9,137,938	\$9,134,189
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Planning, Administration & Debt Service

Office of the City Manager/Contract Compliance	\$52,650	\$53,507
Budget & Evaluation	\$30,976	\$58,098
Accounts & Audits	\$137,806	\$136,195
Treasury	\$25,260	\$23,240
Economic Development	\$171,341	\$175,511
Community Development	\$1,226,050	\$1,084,416
Planning and Buildings	\$398,306	\$401,098

<i>Personnel and Non-Personnel Operating</i>	\$2,042,389	\$1,932,065
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City Pensions	\$68,210	\$77,300
PEAP	\$1,830	\$1,600
Workers' Comp Insurance	\$19,200	\$9,600
Audit & Examiner's Fees	\$5,720	\$5,720
Indirect Costs	\$300,000	\$300,000

<i>Non-departmental Accounts</i>	\$394,960	\$394,220
<i>Total Admin Above</i>		\$2,326,285

<i>Section 108 Debt Service</i>	\$645,591	\$753,802
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<i>TOTAL PLANNING AND ADMINISTRATION</i>	\$3,082,940	\$3,080,087
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<i>TOTAL CDBG BUDGET</i>	\$12,220,878	\$12,214,276
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Relationships by Goal and Objective

	2013 Approved	2014 Award
Housing Objectives		
Homeownership Housing Development		
Strategic Housing Initiatives Program	\$0	\$341,731
Single Family Homeownership Development	\$220,000	\$220,000
total	\$220,000	\$561,731
Rental Housing Development		
Rental Rehab Program	\$640,000	\$580,277
total	\$640,000	\$580,277
Homeownership Supportive Services		
Down Payment Initiative	\$250,000	\$203,125
total	\$250,000	\$203,125
Renters Supportive Services		
Tenant Based Rental Assistance (TBRA)	\$400,000	\$400,000
Renters Supportive Services Total	\$400,000	\$400,000
TOTAL HOUSING DEVELOPMENT	\$1,510,000	\$1,745,133
Other Community Needs		
Economic Development		
Promote Business Development Opportunities		
Neighborhood Capacity Building & Technical Assistance	\$110,000	\$110,000
Promote Business Development Opportunities Total	\$110,000	\$110,000
TOTAL ECONOMIC DEVELOPMENT	\$110,000	\$110,000
Homeless Housing		
Homeless Shelters & Other Homeless Housing		
Homeless to Homes - Permanent Supportive Housing	\$543,352	\$169,007
Homeless Shelters & Other Homeless Housing Total	\$543,352	\$169,007
TOTAL HOMELESS HOUSING	\$543,352	\$169,007
Planning, Administration & Debt Service	\$224,522	\$224,904
TOTAL HOME	\$2,387,874	\$2,249,044

Emergency Solutions Grant (ESG) by Goal and Objective

	2013 Approved	2014 Award
Homeless Housing		
Homeless Shelters & Other Homeless Housing Support		
Strategies to End Homelessness	\$450,000	\$504,452
Homeless Shelters & Transitional Housing Support Total	\$450,000	\$504,452
Homelessness Prevention		
Strategies to End Homelessness	\$310,439	\$347,408
Homelessness Prevention Total	\$310,439	\$347,408
<i>TOTAL HOMELESS HOUSING</i>	\$760,439	\$851,860
Planning, Administration & Debt Service	\$60,846	\$64,119
TOTAL ESG	\$821,285	\$915,979

Housing Opportunities for Persons with AIDS (HOPWA) by Goal and Objective

	2013 Approved	2014 Award
Special Populations Housing		
Operating Support for HIV/AIDS Housing Facilities		
Caracole House	\$215,365	\$194,587
Operating Support for HIV/AIDS Housing Facilities Total	\$215,365	\$194,587
 Supportive Services for Persons with HIV/AIDS		
Caracole House Shelter Plus Services	\$50,257	\$45,408
Cincinnati Center for Respite Care	\$32,000	\$28,913
Supportive Services for Persons with HIV/AIDS Total	\$82,257	\$74,321
 Housing Assistance for Persons with HIV/AIDS		
Northern Ky. Independent Health District	\$142,848	\$129,067
Caracole Short-Term Housing Assistance	\$99,730	\$90,108
Caracole Tenant Based Rental Assistance	\$149,046	\$134,667
Caracole Housing Placement	\$32,882	\$29,709
Housing Assistance for Persons with HIV/AIDS Total	\$424,506	\$383,551
 TOTAL SPECIAL POPULATIONS HOUSING	\$722,128	\$652,459
Planning, Administration & Debt Service	\$19,175	\$20,180
 TOTAL HOPWA	\$741,303	\$672,639