Executive Summary

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

1.   Introduction

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

The 2020 – 2024 City of Cincinnati, Ohio Consolidated Plan is the result of a collaborative process to identify housing and community development needs and to establish goals, priorities, and strategies to address those needs, especially for low- and moderate-income households. The process serves as the framework for a community-wide dialogue to better focus funding from the U.S. Department of Housing and Urban Development formula block grant programs to meet local needs.

The 2020 – 2024 Consolidated Plan was created with the input and active participation of over 1,600 people, including an online community survey, stakeholder meetings, internal staff meetings with various divisions and departments, City Council input, and the Community Development Advisory Board (CDAB). A broad cross-section of the community was represented in these efforts.

The City of Cincinnati looks forward to partnering with HUD, surrounding jurisdictions and government entities, service provider partners, the business community and community leadership to achieve the goals and objectives established for the next five years.

The Consolidated Plan is organized into four primary sections:
1.   The Process (PR)

2. Needs Assessment (NA)
3. Housing Market Analysis (MA)
4. Strategic Plan (SP)

The Process section describes the development of the Consolidated Plan and discusses how the public was involved in the process, how the City consulted with public and private service providers, and other stakeholders to facilitate the development of the Plan. The section also shares key findings from the public survey and stakeholder meetings.
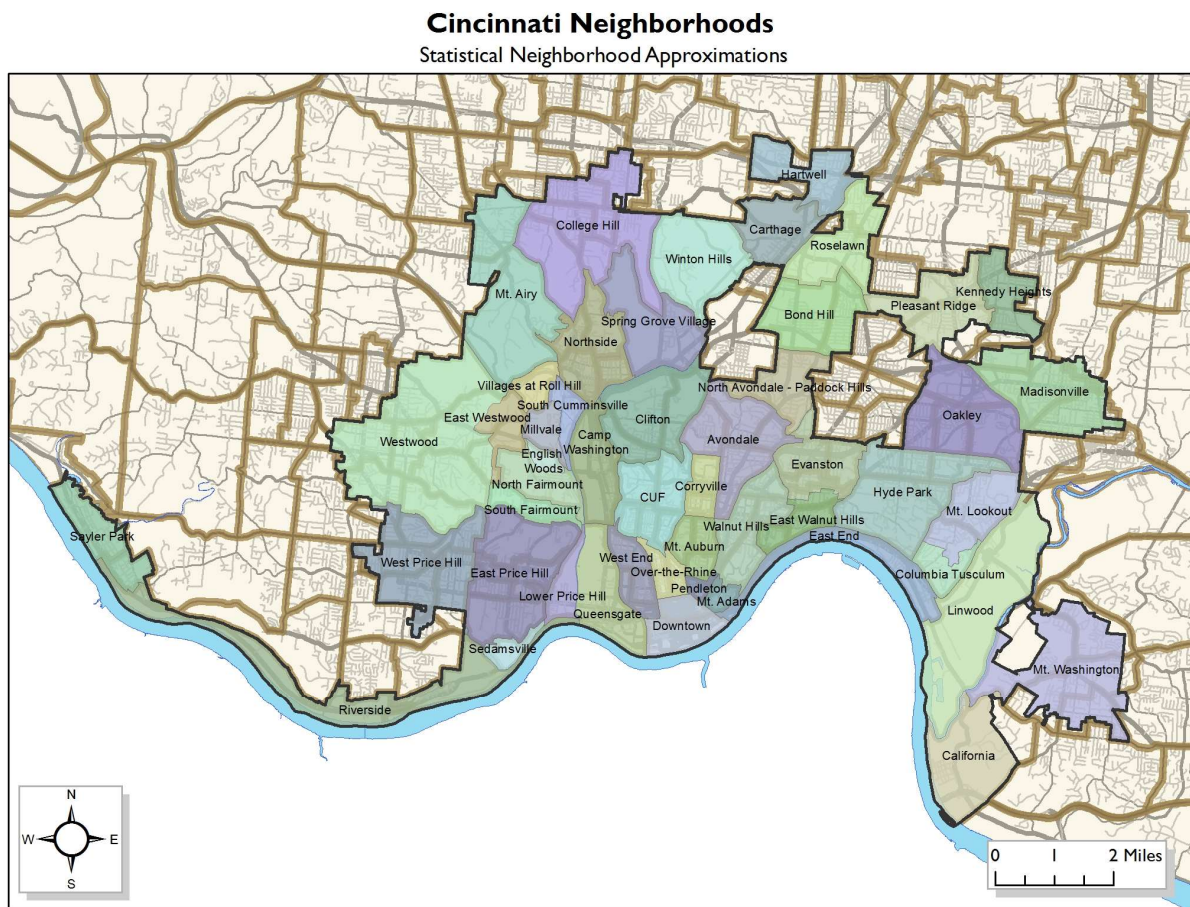
The Needs Assessment provides data, analysis, and other relevant information on the City's needs as they relate to affordable housing, special needs housing, community development, and homelessness. Throughout the Needs Assessment section, attention is paid to the needs of low- and moderate-income (LMI) households, racial and ethnic minorities, homeless persons, and non-homeless special needs populations (including persons with HIV/AIDS, disabilities, the elderly, refugees, etc.).

The Housing Market Analysis section provides information and detailed data about the local housing market conditions in the City of Cincinnati. The Housing Market Analysis is to supplement the information from the Needs Assessment to facilitate the creation of goals that are better tailored to the local context. The purpose of the Housing Market Analysis is to ensure that the priority goals developed through the Strategic Plan process will effectively work in the local market.

The final section of the Consolidated Plan is the **Strategic Plan**. The Strategic Plan section is based on the findings from the Needs Assessment, Housing Market Analysis, community input, and review of existing local/regional planning documents. The primary purpose of the Strategic Plan is to prioritize the needs identified through the Consolidated Planning process in order to develop associated 5-year goals and benchmarks of the established programs that direct the allocation of federal funds in a manner that maximizes community impact.

The findings from the Consolidated Plan were used to determine the types of programs the City would fund in the Annual Action Plans. The First Year Annual Action Plan provides a summary of the actions, activities, and programs the City of Cincinnati will implement during the first year (2020) of the Consolidated Plan to address the priority needs and goals identified by the Strategic Plan. Overall, the Action Plan functions as an annual guide and budget to demonstrate how federal resources will be used to improve conditions for LMI households, racial and ethnic minorities, homeless persons, and other non-homeless special needs populations in the City of Cincinnati.
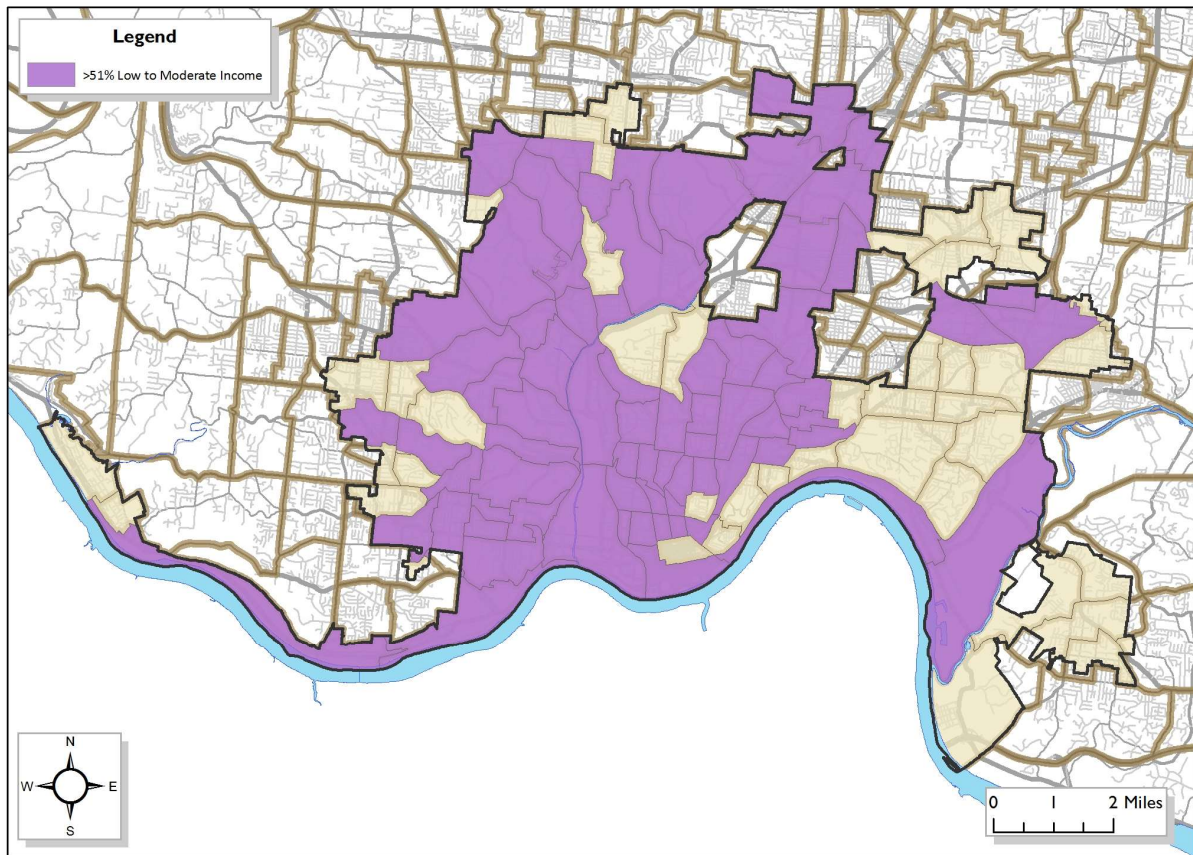
The City of Cincinnati map below depicts the current Statistical neighborhood approximations:

Cincinnati Neighborhoods
Statistical Neighborhood Approximations

The demographic information included in this Consolidated Plan is based primarily on 1990, 2000, and 2010 Decennial Census Counts and the 2013-2017 American Community Survey (ACS) data – the most recent data available – in addition to HUD-provided 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data. The information covers a variety of demographic and housing-related topics for the City of Cincinnati as a whole.

Much of the data is provided by HUD's CHAS data system, which currently includes data from the latest (2013-2017) CHAS database. It should be noted that, where applicable, sources from the ACS have been updated to include 2013-2017 data. ACS data is included, where applicable, as it is more current than CHAS and Census data. The Consolidated Plan submitted through the federal reporting system, Integrated Disbursement and Information System (IDIS), utilized the 2009 – 2013 ACS demographic information.

Low to Moderate Income Census Tracts (2015 ACS)

2.   Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The City's Five-Year Goals, Objectives and Related Outcomes are outlined in 2020 – 2024 Strategic Plan. These goals, objectives and outcomes were selected based on community priorities, prior performance evaluations, the needs assessment, the housing market analysis and *Plan Cincinnati*, which is the City's comprehensive plan adopted in 2012. Top priorities for each grant are highlighted below:

- CDBG programs:
    - Neighborhood business district development;
    - Reducing poverty through employment training and economic self-sufficiency programs;
    - Maintain and improve the quantity and quality of affordable housing for low to moderate income homeowners and renters;
    - Commercial and industrial redevelopment; and

<div align="center">City of Cincinnati 2020 – 2024 Consolidated Plan   4</div>

- Public service activities and supportive services for low to moderate income persons and persons experiencing homelessness.

- HOME programs:
  - Expand, maintain, and improve the quantity and quality of affordable housing for very low and extremely low-income individuals;
  - Down payment assistance for low to moderate-income first-time home buyers; and
  - Operating support for non-profits creating affordable housing.

- Both ESG and HOPWA programs are evaluated by cooperative processes managed by the Continuum of Care, Strategies to End Homelessness (STEH). A consortium meets to review programs and services and recommend funding levels for each respective Annual Action Plan.

  - ESG Programs:
    - At minimum $500,000 is set aside for annually shelter and related supportive services and operation, this amount is currently maxed at 60% of the annual ESG entitlement allocation;
    - Rapid Re-housing services receive the balance of the funding;
    - Housing Relocation and Stabilization Services under Homelessness Prevention and Rapid Re-housing as well as long-term Tenant Based Rental Assistance (TBRA), security deposits, and utilities; and
    - Street Outreach services and protection for victims of domestic violence, dating violence, sexual assault or stalking.

  - Priorities for HOPWA-funded programs:
    - Operating support for housing facilities for persons with HIV/AIDS;
    - Housing assistance through Short-Term Rent Mortgage and Utility (STRMU) payments, Tenant Based Rental Assistance (TBRA) and permanent housing placement;
    - Supportive services including case management; and
    - Emergency shelter and medical care for homeless persons with HIV/AIDS.

The Consolidated Plan priorities factored in the following items: Public Ranking, Community Development Advisory Board Input, staff input, Needs Analysis, Market Analysis, efficiency and effectiveness of programs, leverage of funds, and City Council policy direction.

3.   Evaluation of past performance

Accomplishment data for each Calendar Year is submitted annually in the Consolidated Annual Performance and Evaluation Report (CAPER). During the prior 2015 – 2019 Consolidated Plan, the overall progress was reported in the 2019 CAPER, which was submitted to HUD on March 30, 2020. Although the City of Cincinnati did not prioritize certain goals or programs in the 2015 – 2019 Consolidated Plan, progress related to the goals of all 2015 – 2019 Consolidated Plan activities has been on-going. The City met and exceeded the majority of the goals as established in the 2015 – 2019 Consolidated Plan and will continue to report accomplishments on an annual basis again throughout the 2020 – 2024 Consolidated Plan.

4.   Summary of public participation process and consultation process

A public participation event was held on August 21, 2019, at the City of Cincinnati's Fountain Square, located in the heart of the downtown district. The public was provided comment cards to select the top community needs. Information regarding each program in CDBG, HOME, ESG, and HOPWA was provided. City staff attended the event to answer questions from the public as well as provide information regarding specific programs. The survey was available on-line throughout the calendar year until November 30, 2019. A total of 1,017 individuals completed the survey.

The City's advisory board for the Consolidated Plan / Annual Action Plan process, the Community Development Advisory Board (CDAB), held a public meeting on August 8, 2019 and again on February 5, 2020 to discuss the 2020 funding priory recommendations and review the 2019 CAPER. Each CDBG and HOME-funded program was presented to the board. The CDAB consists of a 17-member volunteer group appointed by the Mayor with City Council approval consisting of 13 diverse community leaders and 4 City representatives. The following is the diverse community leader composition of the CDAB according to Cincinnati Municipal Code: community council members (3), lending institutions (1), small business advocate (1), human services (1), trades / labor representation (1), low income advocate (1), housing authority (1), real estate community (1), developer (1), corporate community (1), community development corporation representative (1), and City of Cincinnati staff representation (4).

The City's final recommended CDBG, HOME, ESG, and HOPWA budgets were presented and approved before the City of Cincinnati's Budget and Finance Committee on April 1, 202. The funding recommendations were based on CDAB and public priorities and also in response to the current health crisis. Public comment for the 2020 – 2024 Consolidated Plan and 2020 Annual Action Plan, as well as for the Request For Release of Funds and Certification began on April 6, 2020 and was completed by April 13, 2020. No public comments were received.

5. Summary of public comments

The City of Cincinnati's Department of Community and Economic Development manages the development and implementation for the CDBG, HOME, ESG, and HOPWA programs and provides guidance to all City departments and subrecipients receiving project funding. An on-line survey was available throughout the majority of CY 2019 for input regarding the 2020 – 2024 Consolidated Plan and 2020 Annual Action Plan. A total of 1,017 individuals responded to the survey.

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

The following public comments have not been accepted due to being ineligible activities with the federal entitlement funds or that other local resources are addressing these issues:
- Heroin epidemic;
- Crime, drugs, gun control, and lack of police presence; and
- Litter and illegal dumping of trash in neighborhoods.

7. Summary

Cincinnati City Council made final appropriation decisions for the 2020 – 2024 Consolidated Plan and 2020 Annual Action Plan Budget and took the public comments into consideration, including the recent health crisis. The public 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 Consolidated Plan and Annual Action Plan.

The Process

PR-05 Lead and Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	CINCINNATI	Department of Community and Economic Development
HOPWA Administrator	CINCINNATI	Department of Community and Economic Development
HOME Administrator	CINCINNATI	Department of Community and Economic Development
ESG Administrator	CINCINNATI	Department of Community and Economic Development

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information

Aisha Tzillah, Community Development Administrator
City of Cincinnati
Department of Community and Economic Development
805 Central Avenue, Suite 700
Cincinnati, Ohio 45202
Aisha.Tzillah@Cincinnati-Oh.gov

PR-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

The City of Cincinnati worked with a wide array of organizations and existing networks to develop the 2020 – 2024 Consolidated Plan and 2020 Annual Action Plan. Each year, relationships are maintained and fostered with these organizations to establish the Annual Action Plans and to coordinate services.

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

- The local Continuum of Care collaborative applicant, Strategies to End Homelessness (STEH), coordinates the efforts of organizations which provide services to the homeless and other special populations for ESG programs and coordinates groups that serve the HIV/AIDS population with HOPWA funding.
- The City of Cincinnati Department of Community and Economic Development and Hamilton County Department of Community Development worked collaboratively on the 2019 Assessment of Fair Housing for the 2020 – 2024 Consolidated Plan.
- The City partners with its Community Development Advisory Board (CDAB) to enhance coordination of the Annual Action Plans and public participation. This volunteer group provides Consolidated Plan group priority programs for funding determined by the City Manager and the members represent the following sectors: community councils, human services agencies, organized labor, low-income advocates, small business, corporate entities, lenders, developers, real estate, Community Development Corporations (CDCs), and City Administration.
- The City works with directly with local non-profit organizations to award human services funds. These services are funded by the City's General Operating Fund at approximately $4.8 million per year.

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

As required by HUD, the Cincinnati/Hamilton County Continuum of Care (CoC) (OH-500) has a CoC Board that oversees all CoC operations and policies, and this board's membership includes representatives from both the City of Cincinnati and Hamilton County. The CoC Board has selected Strategies to End Homelessness, Inc. (STEH) to serve as the CoC Lead Agency and Unified Funding Agent (UFA). In addition to STEH's contractual relationships with HUD, STEH is under

contract with the City of Cincinnati to administer ESG, HOPWA and CoC funds, and to facilitate the work of the community related to homelessness. This work includes the following program types:

- Shelter diversion
- Street outreach
- Emergency shelter
- Transitional housing
- Permanent Housing, including
    - Rapid Re-housing
    - Permanent supportive housing
- Services-only programs

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

- Assesses capacity and identifies gaps
- Evaluates outcomes achieved by funded programs, in comparison to both local and national benchmarks
- Proactively develops improvements and solutions to systemic issues
- Works to implement HUD priorities, such as targeting resources toward priority populations (e.g. chronically homeless, families with children, veterans and unaccompanied youth)
- Facilitates the allocation of funding to these agencies
- Serves as an inclusive vehicle to promote best practices
- Facilitates access to mainstream resources and services for the homeless
- Works to develop policies and procedures to assist homeless persons directly.

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

- The Family Housing Partnership, targeting the needs of homeless families
- The Homeless Veterans work group, targeting the needs of homeless veterans
- The Youth Homelessness work group, targeting the needs of homeless youth
- The Coordinated Entry work group, targeting the needs of chronically homeless individuals through the CoC Coordinated Entry process.

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

The City of Cincinnati, as the local ESG entitlement recipient, determines the exact amount of ESG funding that will go toward shelter operations and Rapid Re-housing, within HUD requirements.

With ESG funding for shelter operations, the CoC Board has adopted a policy approving, and STEH facilitates annually, what is known as the "Prince of Peace" process. This process uses Homeless Management Information System (HMIS) data pertaining to shelter performance and bed nights provided to allocate funds. Using agreed upon performance measures, identified in collaboration with the ESG recipients and subrecipients, higher performing projects receive a higher level of funding than poorer performers. After this HMIS data-driven allocation is presented by STEH, the shelter operators meet, with City of Cincinnati and STEH staff present, to review the allocation and corresponding data for accuracy. The final allocation for each agency is then submitted to the City and County for inclusion in the respective budget and Action Plan.

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

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

1	**Agency/Group/Organization**	Community Development Advisory Board
	Agency/Group/Organization Type	Housing
		Public Housing Authority
		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?	Consolidated Plan and Annual Action Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Development Advisory Board (CDAB) is a group of individuals appointed by the Mayor with Cincinnati Council approval to provide the City with feedback and recommendation on the CDBG and HOME programs. Specifically, the CDAB provides guidance to the City regarding allocation of resources to the programs as part of the Annual Action Plan and throughout the year. In making appointments to the CDAB, the City attempts to attract a broad base of representatives from banking, real estate, housing, economic development, social services providers, and the public 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
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Strategies To End Homelessness is the Cincinnati and Hamilton County Continuum of Care that provides guidance on homeless programs, including ESG and HOPWA.

Table 2 – Agencies, groups, organizations who participated

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

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

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

Name of Plan	Lead Organization	How do the goals of the Strategic Plan overlap with the goals of each plan?
2019 Fair Housing Assessment	City of Cincinnati and Hamilton County	The 2019 Fair Housing Assessment goals and recommendations are incorporated into the Strategic Plan.
City of Cincinnati 2015 – 2019 Consolidated Plan and 2015 Annual Action Plan	City of Cincinnati	The City of Cincinnati's 2015 – 2019 Consolidated Plan and 2015 Annual Action Plan was utilized as a basis in determining the appropriate goals of the 2020 – 2024 Strategic Plan.
Plan Cincinnati 2012	City of Cincinnati	The 2020 – 2024 Consolidated Plan was prepared in part by building on the data, needs analysis, community engagement and strategies in the City's most recent comprehensive plan called *Plan Cincinnati* (November 2012).
Family Homelessness Services Study 2014	Strategies To End Homelessness	The goals as outlined in the Family Homelessness Services Study have been incorporated into the ESG and HOPWA goals as appropriate.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

The City of Cincinnati collaborated with the Cincinnati Metropolitan Housing Authority for information and input regarding the public housing needs of the community.

PR-15 Public Participation

1. Summary of public participation process/Efforts made to broaden public participation

The City of Cincinnati's overall public participation policy for the HUD entitlement grant programs include: at minimum two public participation events annually for comments to be received regarding the Annual Action plan funding priorities and accomplishments from the prior year, at minimum two Community Development Advisory Board (CDAB) meetings to discuss yearly allocations and performance reports, City Bulletin posting of each meeting, and web site postings of Consolidated Plan, Annual Action Plans, Consolidated Annual Performance and Evaluation Reports, and public and CDAB events. Meeting invites are distributed to community groups, subrecipients, and stake holders. The 2020 – 2024 Consolidated Plan and 2020 Annual Action Plan report was made available to the community for at minimum 30-days prior to submission to HUD.

A public meeting hosted by the City of Cincinnati was held at Fountain Square, an accessible facility, on August 21, 2019 to receive public comments regarding the recommended 2020 Annual Action Plan Budget. Other accommodations for sight or hearing-impaired persons and for non-English speaking persons were available upon request. Notice of this Public Event was widely distributed. The notice of the event was posted on the City's website, in the City Bulletin, and via social media on Facebook, Next Door Neighbor, Evensi, and Twitter. Finally, notice of the public hearing was provided to a wide array of community and nonprofit organizations via e-mail. A total of 1,017 responses were collected regarding with community priority, each individually associated with an established entitlement program, has the highest community need.

In finalizing the 2020 Annual Action Plan Budget, the City accepted comments received from the public at several open events. Public input is solicited year-round. The City's recommended CDBG, HOME, ESG, and HOPWA budgets were presented and passed before the City of Cincinnati's Budget and Finance Committee on April 1, 2020. The funding recommendations were based on CDAB priorities, public priorities, City staff recommendations, prior years' resources, program performance, and current crisis situation.

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

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

Summarize public participation process and how it impacted goal setting

The Community Development Advisory Board ranked the programs for C 2020 as follows (with 1 as the highest funding priority):

Program	Rank
Hand Up Initiative	1
Project Lift	2
Housing Repair Services	3
Compliance Assistance Repairs for the Elderly	4
Tenant Representation	5
Concentrated Code Enforcement	6
Neighborhood Business District Improvement	7
Operating Support for Community Development Corporations	8
Emergency Mortgage Assistance	9
Strategic Housing Initiatives Program	10
Youth and Young Adult Employment Program	11
Fair Housing	12
Hazard Abatement Program	13
Code Enforcement Relocation	14
Lead Hazard Testing Program	15
Blueprint For Success	16
Historic Stabilization of Structures	17
Small Business Services	18
Vacant Lot Reutilization	19
Commercial and Industrial Redevelopment	20
Housing Choice Mobility Program	21
Green Urban Watershed Restoration	22
Findlay Market Operating Support	23

The results from the community survey and public participation event resulted in 1,017 individuals providing top community priorities. The survey and comment cards requested option

information, including age, race, gender, tenure, and zip code as well as the opportunity to provide comments.

Community Priority	Federally Funded Program	2020 Rank
Assistance for the elderly and/or disabled	Compliance Assistance Repairs for the Elderly	1
Homelessness prevention and assistance	Emergency Solutions Grant	2
Homeowner repair assistance for the very low-income individuals	Housing Repair Services	3
Youth job training programs	Youth and Young Adult Employment Program	4
Converting vacant lots into pocket parks or urban gardens	Vacant Lot Reutilization	5
Improving neighborhood business districts	Neighborhood Business District Improvement Program	6
Employment training programs for the under- and non-employed	Hand Up Initiative	7
Rehab, new construction of affordable housing	Strategic Housing Initiatives Program	8
Demolishing and barricading vacant buildings	Hazard Abatement Program	9
Historic building preservation	Historic Stabilization of Structures	10
Building code violation enforcement	Concentrated Code Enforcement	11
Small business assistance	Small Business Services	12
Environmental remediation of contaminated sites	Commercial and Industrial Redevelopment	13
Childhood lead poisoning prevention	Lead Hazard Testing Program	14
On-the-job training programs in construction	Blueprint For Success	15
Lower concentrations of poverty in the community	Housing Choice Mobility Program	16
Non-profit organizations assistance with affordable housing	Operating Support for Community Development Corporations (CDCs)	17
Down payment assistance for home buyers	Down Payment Assistance	18
Legal assistance for tenants	Tenant Representation	19
Mill Creek watershed improvement	Green Urban Watershed Restoration	20

Emergency mortgage payment assistance and counseling	Emergency Mortgage Assistance	21
Housing discrimination assistance	Fair Housing	22
Relocation assistance from dilapidated housing	Code Enforcement Relocation	23
Findlay Market assistance and expansion	Findlay Market Capacity Building	24

The optional information of the 1,017 individuals who participated in the survey are as follows:

Age	Responses
less than 18 years old	0
18 to 24 years	36
25 to 34 years	193
35 to 44 years	183
45 to 54 years	232
55 to 59 years	113
60 to 64 years	86
65 years and older	93
Answered	**936**
Skipped	**81**

Race / Ethnicity	Responses
White / Caucasian	644
Black / African American	159
Asian	5
American Indian / Alaskan Native	1
Asian and White	4
Black / African American and White	9
American Indian / Alaskan Native and Black	0
Native Hawaiian / Other Pacific Islander	1
American Indian / Alaskan Native and White	4
Other Multi-Racial	49
Answered	**876**
Skipped	**141**

Gender	Responses
Male	334
Female	552
Transgender	2
Gender neutral	7
Answered	**895**

Skipped	**122**

Tenure	Responses
Owner	678
Renter	199
Answered	**877**
Skipped	**140**

Neighborhood	Responses
Avondale	14
California	0
Bond Hill	18
Camp Washington	1
Carthage	3
Clifton	34
College Hill	37
Columbia Tusculum	6
Corryville	4
CUF	11
Central Business District	12
East End	3
East Price Hill	25
East Walnut Hills	16
East Westwood	2
English Woods	0
Evanston	5
Hartwell	3
Hyde Park	24
Kennedy Heights	8
Linwood	0
Lower Price Hill	2
Millvale	3
Madisonville	19
Mt. Adams	4
Mt. Airy	19
Mt. Auburn	16
Mt. Lookout	7
Mt. Washington	28
North Avondale	8
North Fairmount	3

Northside	52
Oakley	14
Over-the-Rhine	32
Paddock Hills	4
Pendleton	5
Pleasant Ridge	22
Queensgate	2
Riverside	6
Roselawn	8
Sayler Park	8
Sedamsville	2
South Cumminsville	2
South Fairmount	6
Spring Grove Village	7
Villages at Roll Hill	1
Walnut Hills	38
West End	9
West Price Hill	62
Westwood	60
Winton Hills	1
Outside the City limits but within Hamilton County	166
Outside Hamilton County	36
Answered	**878**
Skipped	**139**

Of the 1,017 responses, 196 provided comments. The following lists the most frequent comments received grouped by theme and the number of individuals who provided the specific comment:

86 comments (total) – Low-income housing
- o Increase supply of accessible, safe low-income housing: 19
- o Increase home repair assistance: 12
- o Preserve affordable housing by preserving/maintaining aging housing stock: 11
- o Distribute affordable housing, poverty evenly throughout the city (including east side): 8
- o Low-income versus affordable housing—specifically support *low-income* housing (under 30% or 50% AMI), not just generically affordable housing: 5
- o CMHA/HUD inefficiency, lack of oversight: 5
- o Affordable housing for disabled (18 – 64-year-olds) and families: 5

- o Assistance with securing new housing when displaced by subsidized developments: 4
- o Energy efficiency improvements for low income housing: 4
- o Tenant protections/eviction: 4
- o Tenant education: 3
- o Remove tax abatements for some: 3
- o Bring back Homesteading, Lottery, and Excel programs: 2
- o Abolish single family zoning: 1

26 comments (total) – Combat blight; increase code enforcement; regulate property owners

17 comments (total) – Increase workforce development and youth workforce development services

16 comments (total) – Homeownership

- o Support and increase homeownership (for example, property tax and mortgage assistance, first-time homebuyer education): 12
- o Support middle-income and long-time homeowners, especially those impacted by development and subsequent rising property taxes: 4

13 comments – Address crime, drugs, gun control, and lack of police presence

12 comments – Fix roads/sidewalks

9 comments – Fix infrastructure

8 comments – Build parks and keep existing ones open; create healthy urban ecosystem (invasive species, mosquito reduction, pollinator gardens, urban agriculture)

7 comments – Build bike and pedestrian infrastructure; increase walkability; support aging in place

7 comments – Support local businesses and neighborhood business districts

6 comments – Do more to address homelessness

6 comments – Address litter and illegal dumping of trash in neighborhoods
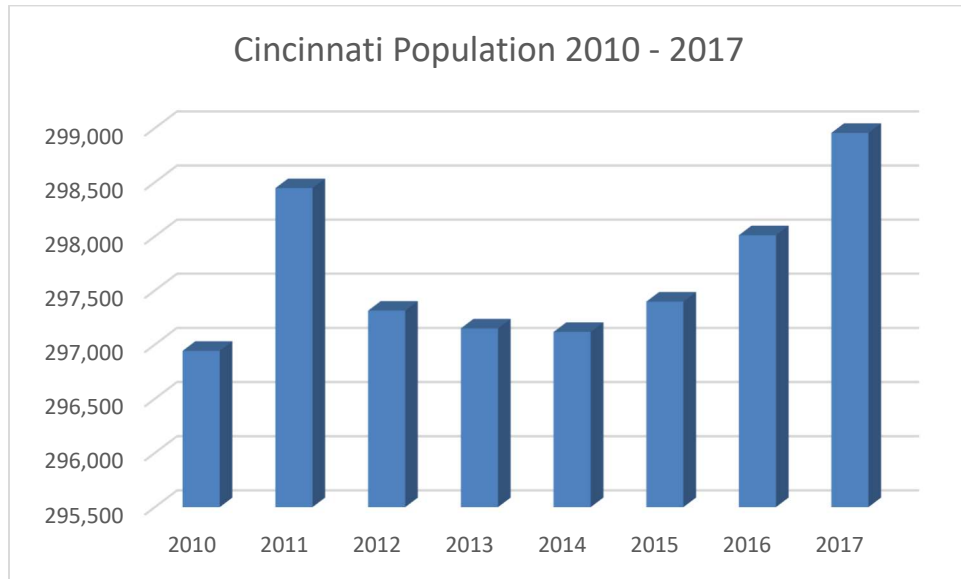
Public Participation Outreach

#	Mode of Outreach	Target of Outreach	Summary of attendance	Summary of comments received	Summary of comments not accepted and reasons
1	Cincinnati Speaks!	Non-targeted / Broad Community	1,017	The community ranked all programs by ranking the needs addressed.	All programs were ranked and funded according to established need.
2	Community Development Advisory Board	Public Hearing	August 8, 2019 February 5, 2020 Quorum in attendance	CDAB reviewed past performance measures and provided funding priorities for the established programs	CDAB rankings were considered with the funding of the programs.
3	Social Media	Non-targeted / Broad Community	Year-round	All comments were reviewed	Ineligible activities and activities that are covered by non-federal resources
4	Departmental Meetings	City Staff	Several meetings	City of Cincinnati Department of Community and Economic Development, City of Cincinnati Property Maintenance Code Enforcement, Cincinnati Recreation Center	Program descriptions were enhanced and expanded to include flexibility in delivery
5	Cincinnati Council	Public Hearing	April 1, 2020	The City Council voted or the entitlement program's budget passage.	
6	Focus groups for fair housing	Targeted populations	Several	18 stakeholder interviews, 8 geographically based focus groups, 5 protected class focus groups, 1 community survey with 494 respondents, 1 housing professional survey with 218 respondents	Summarized in the 2019 Fair Housing Assessment Plan
7	Strategies To End Homelessness (STEH)	Targeted population	Several meetings	STEH provided input regarding the needs and priorities of the homeless and special needs population	

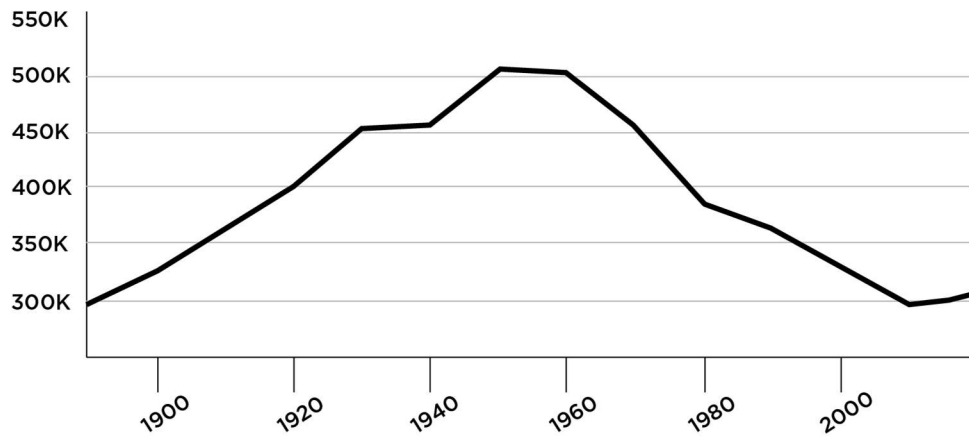**Table 4 – Public Participation Outreach**

Needs Assessment

NA-05 Overview

Needs Assessment Overview

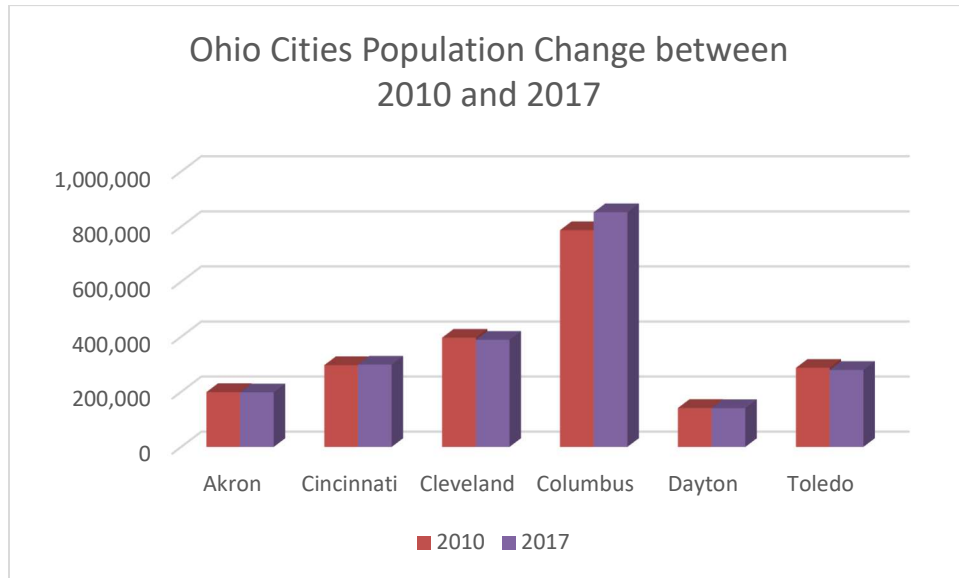

Source: United States Census Bureau

Cincinnati's population peaked in 1950. Since that peak, the City has approximately 40% fewer residents.
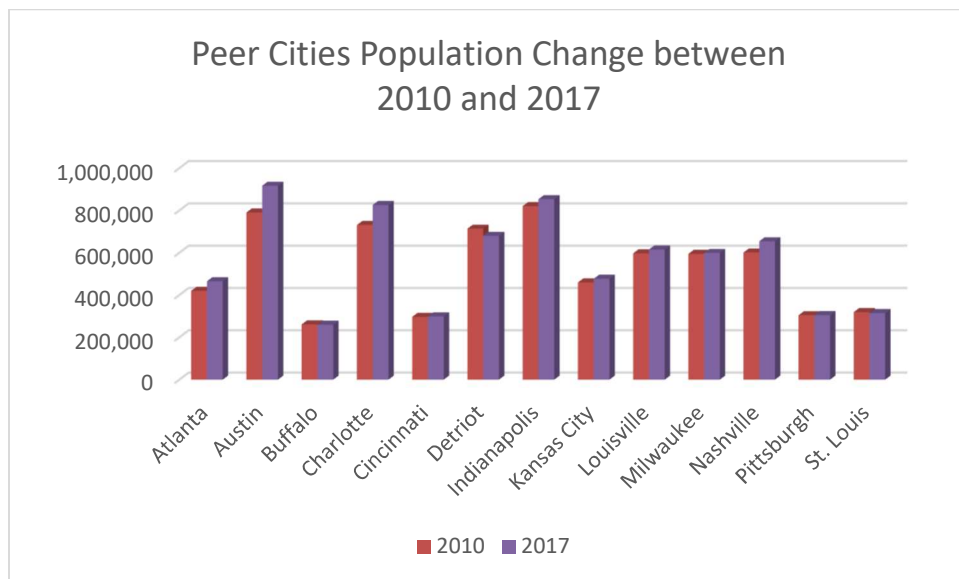

Source: United States Census Bureau

The following tables indicate the following:

- Cincinnati population has stabilized but as a region has been fairly stagnant
- Cincinnati population is comparable to other Ohio cities and peer cities

Source: United States Census Bureau

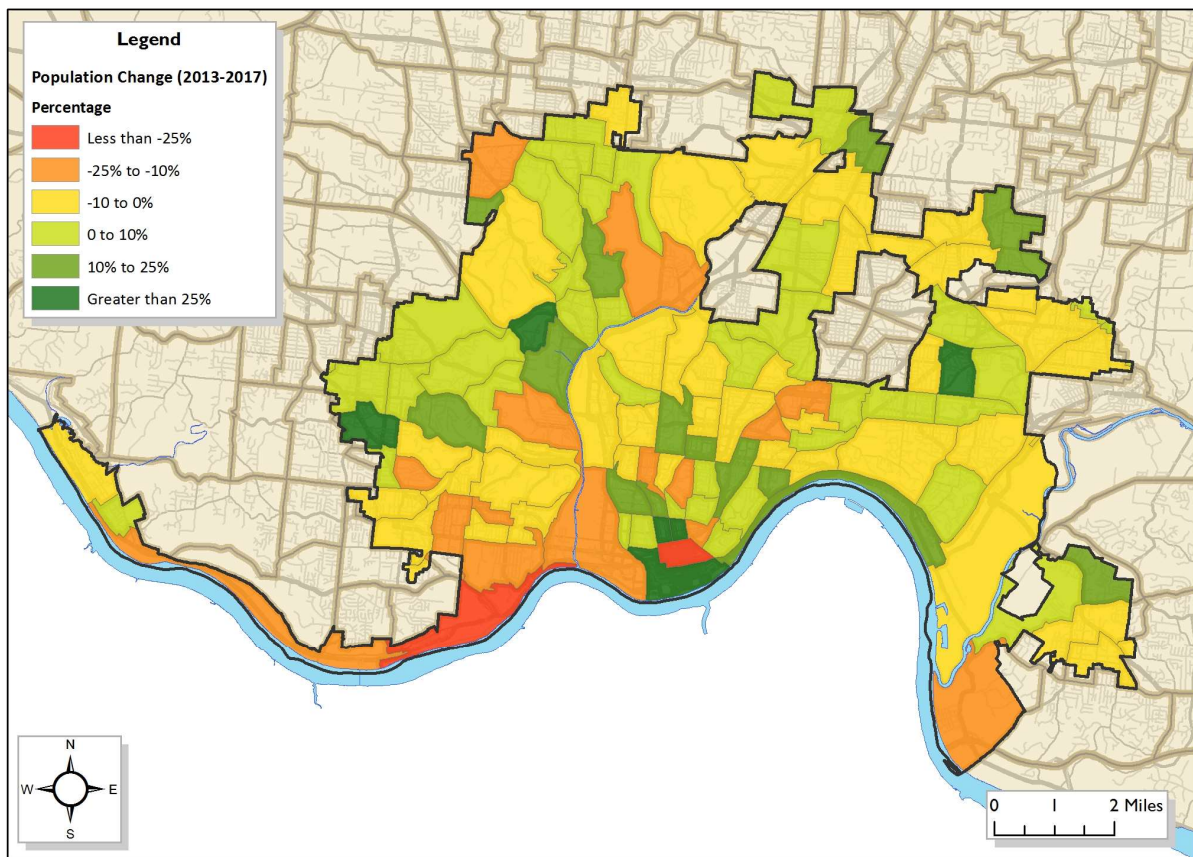*Source: United States Census Bureau*

The overall population map below illustrates the percent change in population from 2013 to 2017 according to census tracts. This illustration indicates the following:
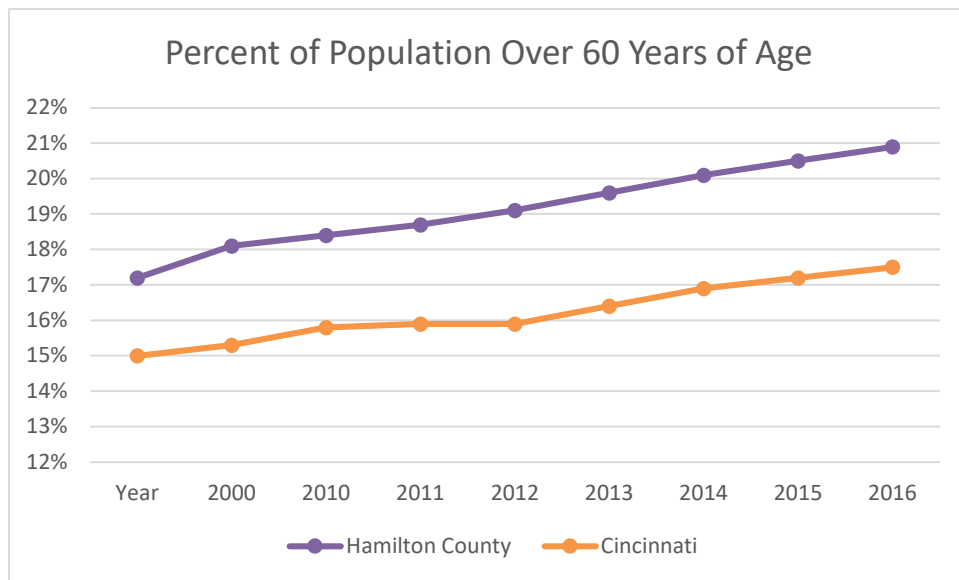
- The majority of the population increase was in the urban core; and
- Population lag has occurred in central portions of the City and western river front.

Population Change 2013-2017 (ACS)

The following graph illustrates by percentage the population over 60-years of age in the City of Cincinnati and Hamilton County (including the City of Cincinnati) from 2000 through 2016. The graph indicated the following:

- The aging population which Cincinnati population is trending is similar with Hamilton County;
- There is an anticipated increasing need for senior housing, assistance with modifications, visitability, and age in place concerns and needs;
- There may be an increased economic vulnerability of future or present fixed income for the aging population; and
- Home improvements for elderly is a high public need and the programs established are currently not meeting the increased needs of the aging population in the area.

Source: United States Census Bureau

NA-10 Housing Needs Assessment – 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Demographics	Base Year: 2010	Most Recent Year: 2017	% Change
Population	296,943	298,957	+0.68%
Households	133,420	161,881	+21.33%
Median Income	$33,681.00	$36,429.00	+8.16%

Table 5 – Housing Needs Assessment Demographics

Data Source: 2010 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	36,895	18,565	21,270	11,500	41,825
Small Family Households	10,935	5,475	7,135	3,640	17,535
Large Family Households	2,375	1,095	755	670	2,040
Household contains at least one person 62-74 years of age	4,210	2,930	2,835	1,755	6,535
Household contains at least one-person age 75 or older	3,100	2,610	2,325	845	2,765
Households with one or more children 6 years old or younger	7,680	2,460	2,550	1,330	3,945

Table 6 – Total Households Table

Data Source: 2013-2017 CHAS

HAMFI: U.S. Department of Housing and Urban Development Adjusted Median Family Incomes

Tables 5 and 6 listing data regarding population and the numbers of household by income indicate the following:

- The City of Cincinnati is stabilizing in population after decades of decline;
- The 2018 census estimates the Cincinnati population was over 300,00 (301,301) in the first time in over a decade;
- In 2017, the median income increased 8% from 2010, which is only 1% annually and is less than inflation rate; and
- The overall household size is decreasing.

Housing Needs Summary Tables

The City of Cincinnati defines "Standard" housing as a unit that meets local and state property maintenance and zoning codes. Housing that is substandard but suitable for rehabilitation means that the unit is in poor condition, but it is both structurally and financially feasible to rehabilitate. The "Conditions" are defined as lacks complete kitchen facilities, lacks complete plumbing facilities, more than 1.5 persons per room, and cost burden over 50%.

AMI: Area Median Income

2. Housing Problems 1 (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing – Lacking complete plumbing or kitchen facilities	855	180	150	105	1,290	40	30	30	75	175
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	290	155	145	95	685	10	--	10	--	20
Overcrowded – With 1.01-1.5 people per room (and none of the above problems)	745	270	125	65	1,205	65	80	10	45	200

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 50% of income (and none of the above problems)	17,695	2,195	325	10	20,225	2,895	1,475	1,305	185	5,860
Housing cost burden greater than 30% of income (and none of the above problems)	4,440	7,195	2,920	360	14,915	470	1,540	2,760	1,550	6,320
Zero/negative Income (and none of the above problems)	3,820	--	--	--	3,820	370	--	--	--	370

Table 7 – Housing Problems Table

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	19,590	2,800	740	275	23,405	3,010	1,580	1,355	300	6,245

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having none of four housing problems	9,320	11,220	12,685	5,570	38,795	790	2,965	6,490	5,355	15,600
Household has negative income, but none of the other housing problems	3,820	--	--	--	3,820	370	--	--	--	370

Table 8 – Housing Problems 2
  Data Source: 2013-2017 CHAS

3. Cost Burden > 30% of annual income

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	7,635	2,960	1,050	11,645	600	850	1,595	3,045
Large Related	1,725	490	125	2,340	210	230	170	610
Elderly	3,350	1,820	565	5,735	1,565	1,345	990	3,900
Other	10,910	4,410	1,535	16,855	1,095	655	1,330	3,080
Total need by income	23,620	9,680	3,275	36,575	3,470	3,080	4,085	10,635

Table 9 – Cost Burden > 30%
  Data Source: 2013-2017 CHAS

3. Cost Burden > 50% of annual income

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	6,205	540	25	6,770	530	315	440	1,285
Large Related	1,480	95	--	1,575	175	45	95	315
Elderly	2,225	545	170	2,940	1,190	585	240	2,015
Other	8,940	1,045	135	10,120	1,060	555	530	2,145

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Total need by income	18,850	2,225	330	21,405	2,955	1,500	1,305	5,760

Table 10 – Cost Burden > 50%

    Data Source: 2013-2017 CHAS

4. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	830	385	210	150	1,575	75	80	20	20	195
Multiple, unrelated family households	100	40	30	10	180	--	--	--	25	25
Other, non-family households	140	35	29	--	204	--	--	--	--	--
Total need by income	1,070	460	269	160	1,959	75	80	20	45	220

Table 11 – Crowding Information – 1/2

    Data Source: 2013-2017 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	Data Not Available							

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

Data is limited on the housing needs of the City of Cincinnati single residents. In 2018, according to the Cincinnati /Hamilton County CoC, single adults made up two-thirds of the population served in emergency shelter and unsheltered. According to the 2017 ACS, 27% of non-family households are below the poverty line.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

In 2019 there were 91 families served in the Domestic Violence shelter, including a total of 148 children. In addition, the YWCA of Greater Cincinnati identified an additional 297 callers who were experiencing Domestic Violence who were, due to limited capacity, not brought into shelter. Of those households, the YWCA estimates 62% were families, so an additional 184 families were potentially in need of housing to flee Domestic Violence. The average family size assisted is generally 3 (head of household and 2 children).

What are the most common housing problems?

According to the data provided in Tables 7 through 12, the most comment housing problems are over-crowding, lacking plumbing facilities, and cost burden.

Are any populations/household types more affected than others by these problems?

According to the data provided in Tables 7 through 12, the population at 0 – 30% AMI who are renters have the are most affected with these housing issues.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Many systemic factors affect and/or are needs of households that are at-risk of homelessness, have experienced homelessness, or are currently in supportive housing:

1. Family homelessness: Consistently over the past five years, people in families, children with parents/guardians, have made up a third of the population served in emergency shelter and unsheltered in the Cincinnati/Hamilton County CoC. Beginning in 2015, Strategies to End Homelessness, the Society of St. Vincent de Paul, Bethany House Services, Interfaith Hospitality Network of Greater Cincinnati, The Salvation Army, and the YWCA of Greater Cincinnati developed the "Solutions for Family Homelessness" plan to identify how the community can proactively address the needs of families experiencing homelessness. The recommendations in the plan focused in four key areas:

   o Prevention – Emergency Assistance and Shelter Diversion programs are proven to be successful and cost-effective ways of preventing homelessness, but too many

families that would otherwise be able to receive this assistance are being turned away due to a lack of capacity and resources. Families that are relying on others for a place to stay ('doubled up') may be unaware of or unable to access such community resources. In addition, earlier intervention, such as when a family is facing eviction could prevent the severity of the crisis and meet the needs of families with a more modest financial investment. Prevention related goals in the plan focus on: 1) Focusing more resources on Emergency Assistance and Shelter Diversion services; 2) Educate community providers such as physicians/practitioners, early childhood providers, and schools about risks of family homelessness so that they can help with early identification of families at risk, and developing and implementing a process for such providers to connect families to homelessness prevention resources; and 3) Providing the lowest level of assistance necessary to effectively assist each family and stop the progression toward homelessness.

o Capacity Building – within systems assisting homeless and at-risk families, there are differing definitions and expectations for case managers across agencies, programs, and funding streams. The lack of standardization and coordination creates unnecessary barriers to achieving stability. Furthermore, other services that address issues related to employment, parenting, physical and mental health, and childcare lack the coordination needed to respond quickly to families' needs. Shelters generally do not have sufficient resources, services, and staff to meet the needs and potential impact of trauma experienced by both the parents and their children. Providing access to quality shelter services, such as mental health care, employment or educational assistance for children struggling in school, is compromised by the fact that Cincinnati/Hamilton County provides emergency shelter to families within 7 separate buildings. This scattered approach dilutes the resources available, reduces the effectiveness of services, increases lengths of stay in shelter, and negatively affects outcomes. The Family Homelessness Services Study conducted in 2014 described the average homeless family in Cincinnati as a single 30-year old mother with two children under the age of 6. Homeless shelter residents have difficulty seeking jobs, finding housing, and accessing other resources outside of the shelter without having somewhere to leave their children on short notice. Also, childcare services need to be equipped to handle the special needs of children traumatized by homelessness, which can be difficult to manage and respond to effectively. Capacity Building related goals in the plan include: 1) Increasing coordination and efficiency among providers and funders; 2) Improving the quality of emergency shelter facilities to provide all families access to the care

needed, at the level required to ensure success; and 3) Developing specialized early childhood services for families to access childcare and supportive services while in shelter.

- o Policy Change – there is an established lack of affordable housing in Hamilton County and funding that could be used to develop additional affordable housing. Funding streams may dictate compartmentalized approaches to services, which limits the ability of programs to follow families across transitions and to consider needs beyond housing. Families at risk of homelessness may not access particular resources that might prevent housing instability and instead must wait until homelessness is experienced. Policy change strategies in the plan include: 1) Expanding local government support for the development of affordable, family-sized housing units; 2) Exploring policy changes needed to secure sufficient and flexible funding that will allow for implementation of recommendations; 3) Expanding the Ohio Housing Finance Agency (OHFA) Low Income Housing Tax Credit program to allow for the funding of more than one Permanent Supportive Housing project per community; and 4) Expanding services currently available to homeless families to include families at-risk of homelessness.

- o Housing – There is an established lack of affordable housing and existing subsidy programs may not consistently prioritize families experiencing the most significant housing crises. The three most common concerns of property owners in leasing to people experiencing homelessness are non-payment of rent, property damage, and financial burden associated with eviction and apartment turnover. Common concerns for families and homeless service providers are the lack of quality property owners who maintain safety, security and cleanliness. People will typically sign up on multiple lists to obtain housing; however, this duplication may delay access for at-risk families needing immediate placement. Plan recommendations pertaining to housing include: 1) Maximizing subsidized housing opportunities by coordinating waiting lists, increasing subsidies, and strategically targeting existing subsidies toward homeless and at-risk families; and 2) Increasing collaboration with private property owners and faith-based service providers.

2. <u>Homeless and at-risk youth:</u> In 2018, youth age 18 – 24 made up 11% of the population served in shelters and unsheltered in the Cincinnati/Hamilton County CoC. Fortunately, the local CoC for the homeless was one of the first in the nation to be selected by HUD to be a part of a national Youth Homelessness Demonstration Program. This led to the

development of the "KEYS to a Future without Youth Homelessness" plan to prevent and end youth homelessness. KEYS include HUD funded projects to increase access to housing resources and supportive services for young adults experiencing homelessness. KEYS includes innovative approaches and partnerships to connect youth to services and to prevent homelessness, and is being implemented as a partnership between Lighthouse Youth and Family Services, Bethany House Services, Interfaith Hospitality Network of Greater Cincinnati, YWCA of Greater Cincinnati, The Salvation Army, Children's Law Center and Strategies to End Homelessness. The project serves young adults ages 18 – 24 experiencing homelessness, pregnant and parenting youth, 18 – 24-year-olds in danger of losing housing and homeless youth with legal barriers to housing.

The planning process that developed the KEYS plan recommended the following services:
- o Diversion – Assisting all youth entering the homeless system with finding safe and appropriate housing with friends or family, while providing the supports necessary to find and keep permanent housing.
- o Youth Dedicated Service Team – A team of case managers assisting clients in finding and maintaining housing for up to 24 months after rental assistance ends.
- o Progressive Engagement Housing – Providing flexible and client-driven rental assistance to youth that need it for as long as needed.
- o Legal Services – Young adults may attend group legal clinics and have individual representation from a staff attorney to help youth address any legal barriers or arrears preventing permanent housing options.

3. Single Adults: In 2018, single adults made up two-thirds of the population served in emergency shelter and unsheltered in the Cincinnati/Hamilton County CoC. While the HUD emphasis on serving families has led to an increase in resources targeted toward families, there has been a corresponding decrease in the level of resources targeted toward single individuals, despite this subpopulation having such noted prevalence among the overall homeless populations. For example, in the local CoC, 78% of families that are prioritized to receive rapid re-housing (RRH) services are matched with an RRH program, while only 49% of single individuals that are prioritized to receive RRH services are matched with a housing program.

4. Aftercare: Formerly homeless families and individuals who have received rapid re-housing assistance often still have a number of needs, such as employment, upon approaching the termination of the assistance. Unfortunately, many of these factors are beyond the control of the agencies administering housing programs due to the systemic nature. Also, after a household exits an RRH or permanent supportive housing (PSH)

program, the case management services provided as a part of that program also end. A point of emphasis in the local CoC has been to develop aftercare services, which can follow households after exiting the system for an indeterminate period of time, and which can be available to help households when/if there is difficulty maintaining housing months or even years after exiting homelessness, and potentially preventing additional episodes of homelessness.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The Central Access Point (CAP) is Cincinnati/Hamilton County's homeless services hotline. CAP serves as the entry point into many programs for homeless and at-risk households. In 2018, 1,392 households containing 5,842 people contacted CAP requesting services – 408 of these households were placed by CAP into a family shelter. During the same time, over 2,656 single individuals also contacted CAP, despite the fact that CAP is not currently able to place single individuals into shelter beds in the same way it can families.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Strategies to End Homelessness collaborates with several funders, including the City of Cincinnati, to deliver homelessness prevention services, following a "Shelter Diversion" model. Shelter Diversion serves households that present for emergency shelter but are able to be diverted from shelter and then connected with permanent housing. Shelter Diversion has been designed as a short-term (3 – 6 month) intervention, with partner agencies providing case management services and support to clients during their time in the program.

Through the knowledge and data accumulated operating prevention services since the inception in 2009, the following criteria has been established as most directly being tied to a household experiencing instability and risk of literal homelessness:
- Income is less than 30% Area Median Income;
- Has moved frequently because of economic reasons (defined as 2 or more times during the 60 days immediately preceding the application for prevention assistance);
- Is living in the home of another because of economic hardship;
- Has been notified that the right to occupy current housing or living situation is being terminated;
- Resides in a hotel or motel (not paid for by a state, local, federal, or charitable organization funds);

- Resides in severely overcrowded housing; and
- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness; for example, utility shut off notice or eviction notice.

The following homelessness prevention activities are ongoing, due to their impact in assisting populations at higher risk of homelessness:

1. Supportive Services for Veteran Families (SSVF): Talbert House has been awarded SSVF funding to implement programming which prevents homelessness for veterans and their families.

2. KEYS: The local CoC for the homeless was one of the first in the nation to be selected by HUD to be a part of a national Youth Homelessness Demonstration Program. This led to the development of the "KEYS to a Future without Youth Homelessness" plan to prevent and end youth homelessness.

3. Youth Aging out of Foster Care: A U.S. Department of Health and Human Services (HHS) funded effort is currently underway, led by Lighthouse Youth and Family Services, targeted toward preventing homelessness among youth who have been in the Foster Care system. This effort will support enhanced identification, data collection and services to youth formerly in the foster care system, as one-third of youth aging out of foster care experience homelessness. National studies have also shown that between 21 – 53% of homeless youth have at one point been placed in foster care.

4. LGBTQ Youth Homelessness Prevention Initiative: Cincinnati/Hamilton County was one of only two communities in the country selected to participate in a national technical assistance initiative which has identified and implemented strategies for preventing LGBTQ youth from becoming homeless. This initiative, named, "Safe and Supported", is being led locally by Lighthouse Youth and Family Services and Strategies to End Homelessness, and being conducted in cooperation with HUD, HHS, the Department of Justice, Department of Education, and United States Interagency Council on Homelessness (USICH).

Discussion

The majority of public participation comments were related to affordable housing issues, which is also supported and indicated by the data. There is a correlation to the areas of low-income residents in affected neighborhoods who are disproportionally experiencing housing needs. Tables 7 through 12 indicate the following current targeted needs that are incorporated into the established programs, also based on past performance, and will be reported on annually:

- Extremely low-income, low-income, moderate-income, and middle-income individuals: 20,000 housing code inspections; 1,000 persons assisted with unlawful housing discrimination; 300 persons assisted to prevent homelessness
- Renters: 20 persons assisted with emergency relocation from dilapidated housing
- Owners: 100 persons assisted with foreclosure prevention; 20 households assisted with down payment for first time homeowners
- Elderly individuals and persons with disabilities: 10 housing units rehabilitated
- Single persons: 200 persons assisted with legal representation in response to housing violations
- Large families: 1,000 housing units rehabilitated
- Public housing residents: 10 households assisted with relocation out of high poverty neighborhoods
- Individuals with HIV/AIDS and their families: 400 households
- Victims of domestic violence, dating violence, sexual assault and stalking: 400 individuals
- Individuals receiving rapid re-housing assistance: 100 households

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole

Introduction

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	27,510	5,200	4,190
White	9,535	1,155	1,080
Black / African American	16,180	3,880	2,495
Asian	510	15	389
American Indian, Alaska Native	90	25	4
Pacific Islander	--	--	--
Hispanic	595	90	55

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	13,120	5,445	--
White	5,340	2,370	--
Black / African American	6,910	2,830	--
Asian	200	75	--
American Indian, Alaska Native	55	10	--
Pacific Islander	--	--	--
Hispanic	435	105	--

Table 14 - Disproportionally Greater Need 30 - 50% AMI

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	7,780	13,490	--
White	4,100	6,375	--
Black / African American	3,265	6,490	--
Asian	85	125	--
American Indian, Alaska Native	14	10	--
Pacific Islander	--	20	--
Hispanic	240	285	--

Table 15 - Disproportionally Greater Need 50 - 80% AMI

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,490	9,010	--
White	1,430	5,075	--
Black / African American	890	3,425	--
Asian	39	225	--
American Indian, Alaska Native	25	25	--
Pacific Islander	--	--	--
Hispanic	94	170	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Tables 13 through 16 indicate the following:

- In the income range of 0-30% AMI, the black population has a disproportionate increase in the number of housing problems over other races;
- In the income range of 30-100% AMI, the black and white populations experience about the same number of housing issues;
- In the income range of 0-30 AMI and 30-50% AMI, Hispanics in both of these income ranges experience similar number of housing problems;
- There is not any information on Pacific Islanders in the area; and
- All of the housing needs and problems are not fully demonstrated in the data due to individuals not counted due to homelessness and the likely underrepresentation of minorities and immigrants.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole

Introduction

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	22,600	10,110	4,190
White	8,055	2,640	1,080
Black / African American	12,975	7,090	2,495
Asian	465	60	389
American Indian, Alaska Native	85	30	4
Pacific Islander	--	--	--
Hispanic	505	180	55

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,380	14,185	--
White	1,915	5,795	--
Black / African American	2,160	7,585	--
Asian	60	215	--
American Indian, Alaska Native	15	45	--
Pacific Islander	--	--	--

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Hispanic	220	325	--

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,095	19,175	--
White	1,055	9,430	--
Black / African American	855	8,905	--
Asian	24	180	--
American Indian, Alaska Native	4	20	--
Pacific Islander	--	20	--
Hispanic	140	385	--

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	575	10,925	--
White	280	6,220	--
Black / African American	210	4,105	--
Asian	--	260	--
American Indian, Alaska Native	--	50	--
Pacific Islander	--	--	--
Hispanic	90	175	--

Table 20 – Severe Housing Problems 80 - 100% AMI
 Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Tables 17 through 20 indicate the following:

- Throughout the low-income ranges, the severe housing problems are about the same for the black and white population;
- Severe housing problems are disproportionately increased for the extremely low-income black population;
- Around 80% (4 out of 5) of extremely low-income individuals experiencing one or more housing problems are also experiencing severe housing problems, which this rate is consistent for both extremely low-income black and white population; and
- The numbers may not be reflective of current conditions in the City, since if there have been any significant changes that occurred within the last 5 years, the information provided may not be an accurate representation of what is occurring in the community.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole

Introduction:

Housing Cost Burden

Housing Cost Burden	≤30%		30-50%		>50%		No / negative income (not computed)		Total	
Jurisdiction as a whole	73,500	57%	24,520	19%	27,730	21%	4,310	3%	130,060	
White	43,645	65%	11,275	17%	10,920	16%	1,095	2%	66,935	51%
Black / African American	25,740	46%	12,005	22%	15,095	27%	2,555	5%	55,395	43%
Asian	1,495	55%	325	12%	505	18%	399	15%	2,724	2%
American Indian, Alaska Native	130	40%	90	27%	105	32%	4	1%	329	1%
Pacific Islander	25		--		--		--		25	0%
Hispanic	1,680	59%	450	16%	620	22%	90	3%	2,840	2%

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2013-2017 CHAS

Discussion:

Table 21 indicates the following:

- 65% of whites are not cost burdened while 46% of blacks are not cost burdened; and
- Nearly 30% of black households are cost burdened by more than 50% of household income, while it is only 16% for white households.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The census data utilized potentially does not reflect current conditions in the community due to the lack of available data. There may be limitations in reviewing the data presented if the City's population has changed in the last 5 years, the data may not be an accurate representation of the current needs. The information indicates Hispanic population has increased significantly since 2010. Also, black households suffer from a wealth disparity that is greater than income disparity. The black population in the area is disproportionately cost burdened and disproportionately subject to severe housing problems, particularly in the extremely low-income category. Without resources to address housing and business concerns, these economic indicators affect an individuals' ability to own homes and start businesses.

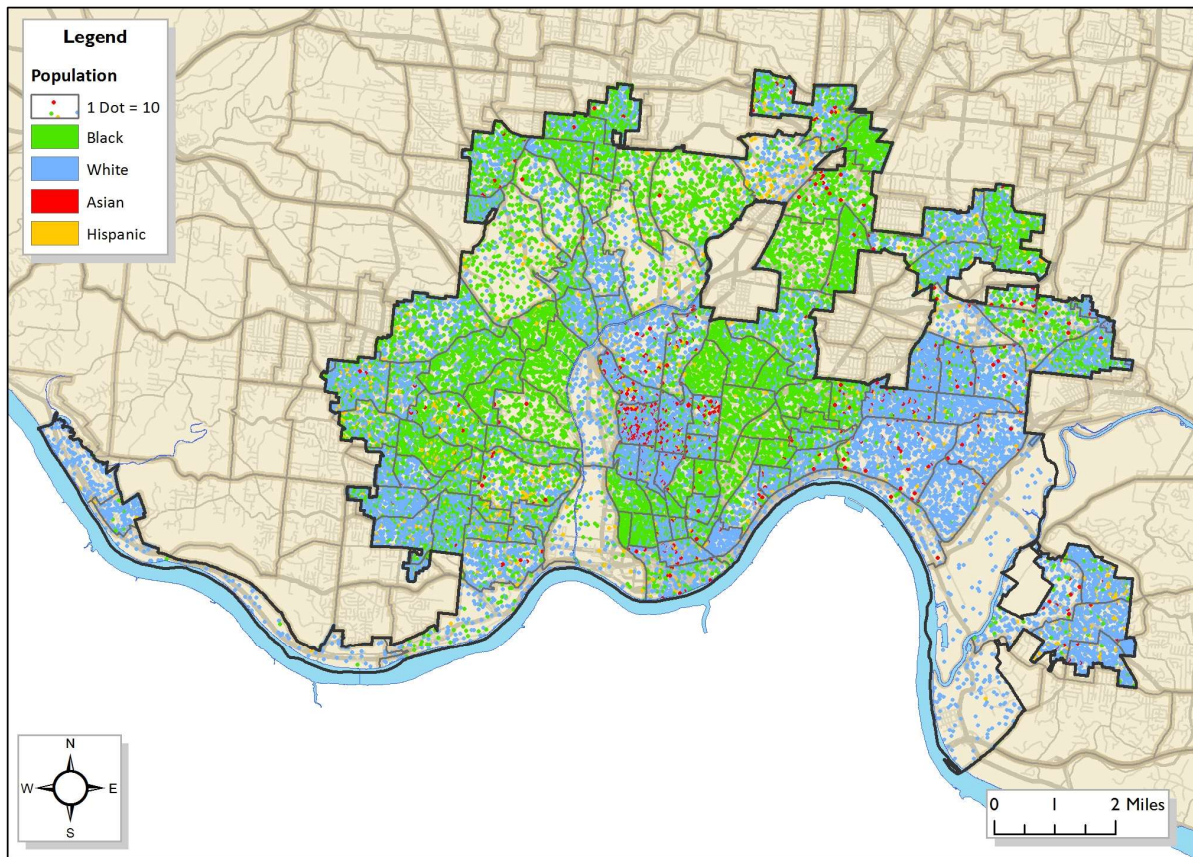**If they have needs not identified above, what are those needs?**

Resources are necessary to develop new affordable housing inventory, improve and preserve the existing inventory, assist low- and moderate-income property owners, and provide emergency eviction assistance. Agencies that have capacity in housing production to develop affordable housing, and agencies that provide supportive housing services to connect with housing providers and create networks between the two will make the most of limited resources to provide housing units and the services people need to be successful.

Land use regulations that require, single-family lot sizes larger than a quarter acre, that prohibit multi-family housing, that regulate housing classifications by type of occupant and definitions of a family are likely having a disparate impact on low-income, protected classes of residents.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in the community?

The following maps of the City of Cincinnati depicts the race and ethnicity of the Cincinnati population by census tract. The maps do not indicate proportions of the different races but only indicates the raw population numbers within the census tracts. Black, white, Asian, and Hispanic populations are shown in separate maps as well.
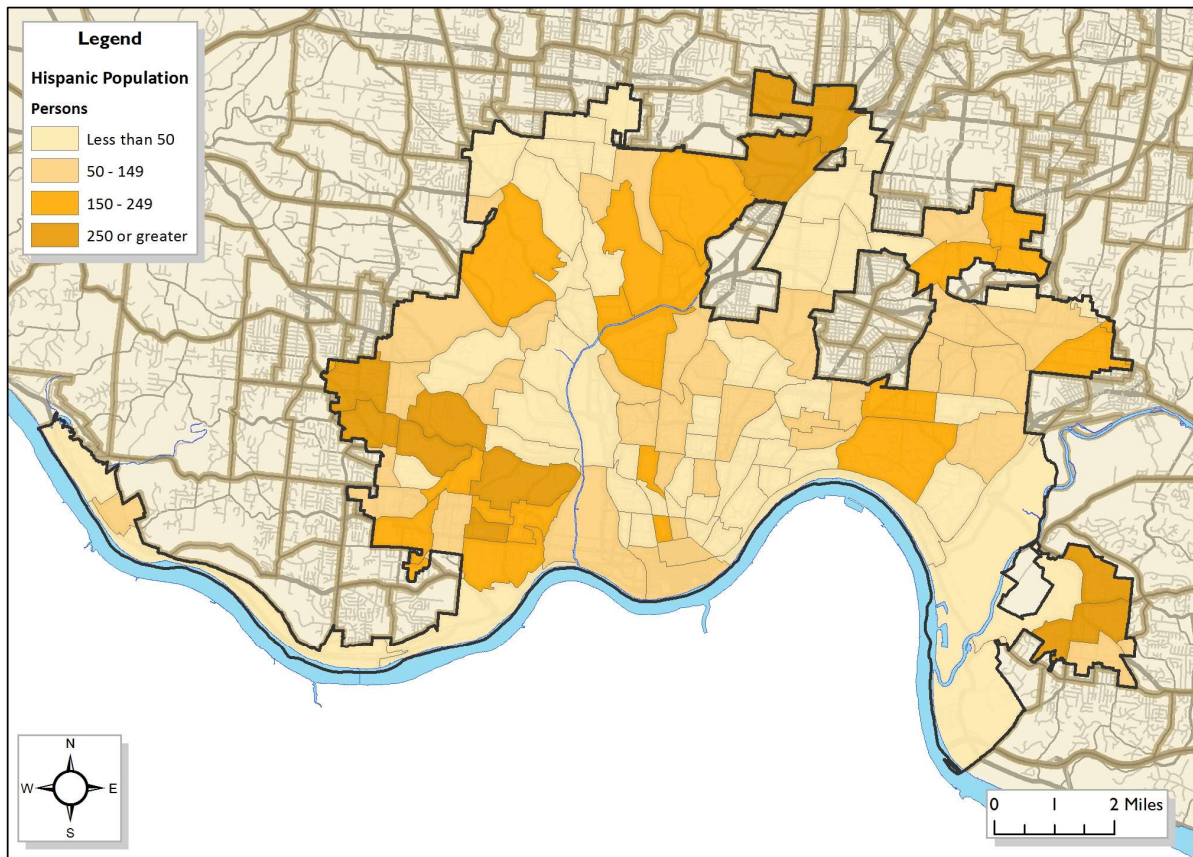
Population by Race and Ethnicity (2017 ACS)

The Population by Race and Ethnicity map indicates there are pockets of segregation located in the majority of all neighborhoods and also indicates the following:

- The black population is concentrated in portions of central and western city neighborhoods, including Avondale, Bond Hill, Roselawn, Villages at Roll Hill and along the Mill Creek Corridor;
- The white population is concentrated in portions in the eastern neighborhoods and far western neighborhoods, including Hyde Park, Mt. Lookout, Oakley, and Sayler Park;
- The white population is primarily located in the eastern part of the City, east of Interstate-71; and
- The central area, between Interstate-75 and Interstate-71, are majority black population.
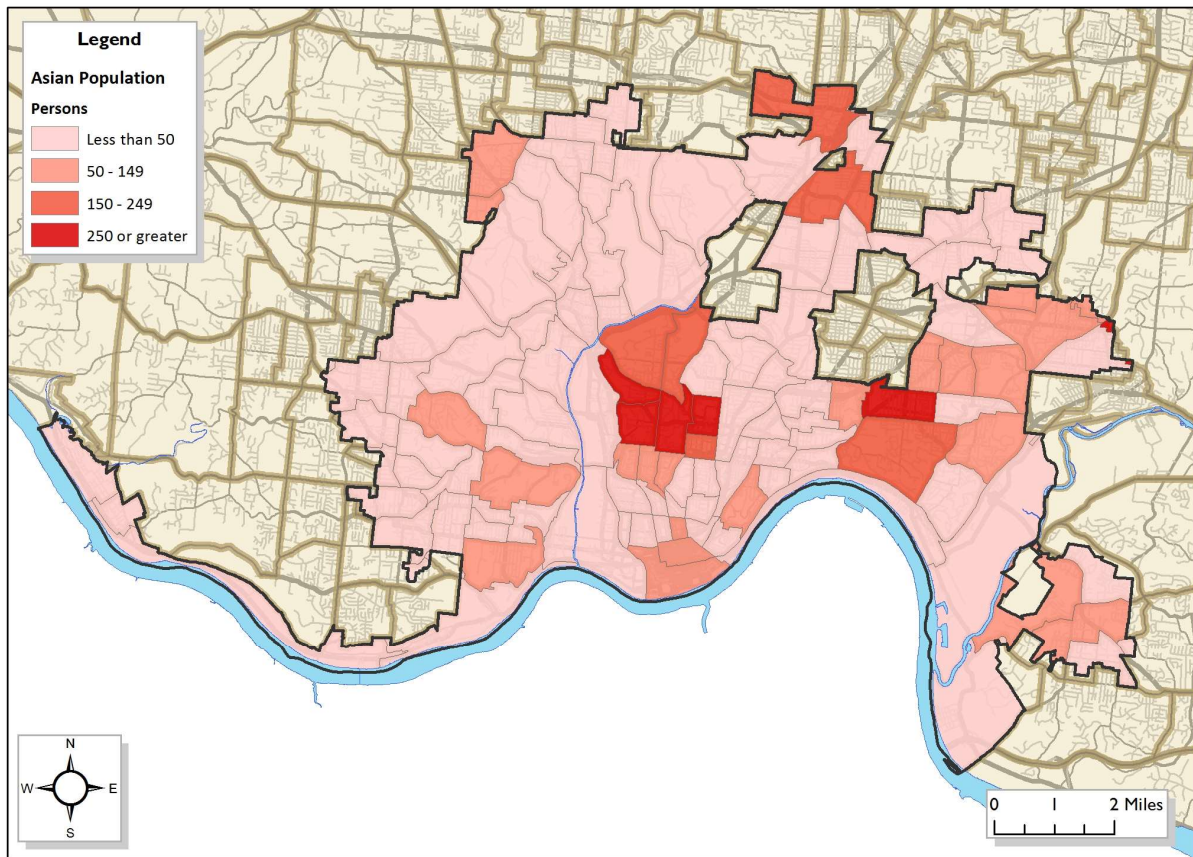
Hispanic Population (2017 ACS)

The Hispanic Population map indicates the following:

- The Hispanic population is clustered in the neighborhoods of East, West, and Lower Price Hill, Carthage, Mount Washington, Spring Grove Village, and Westwood; and
- Although there are areas where the Hispanic population is clustered, the Hispanic population is widely dispersed throughout the City.
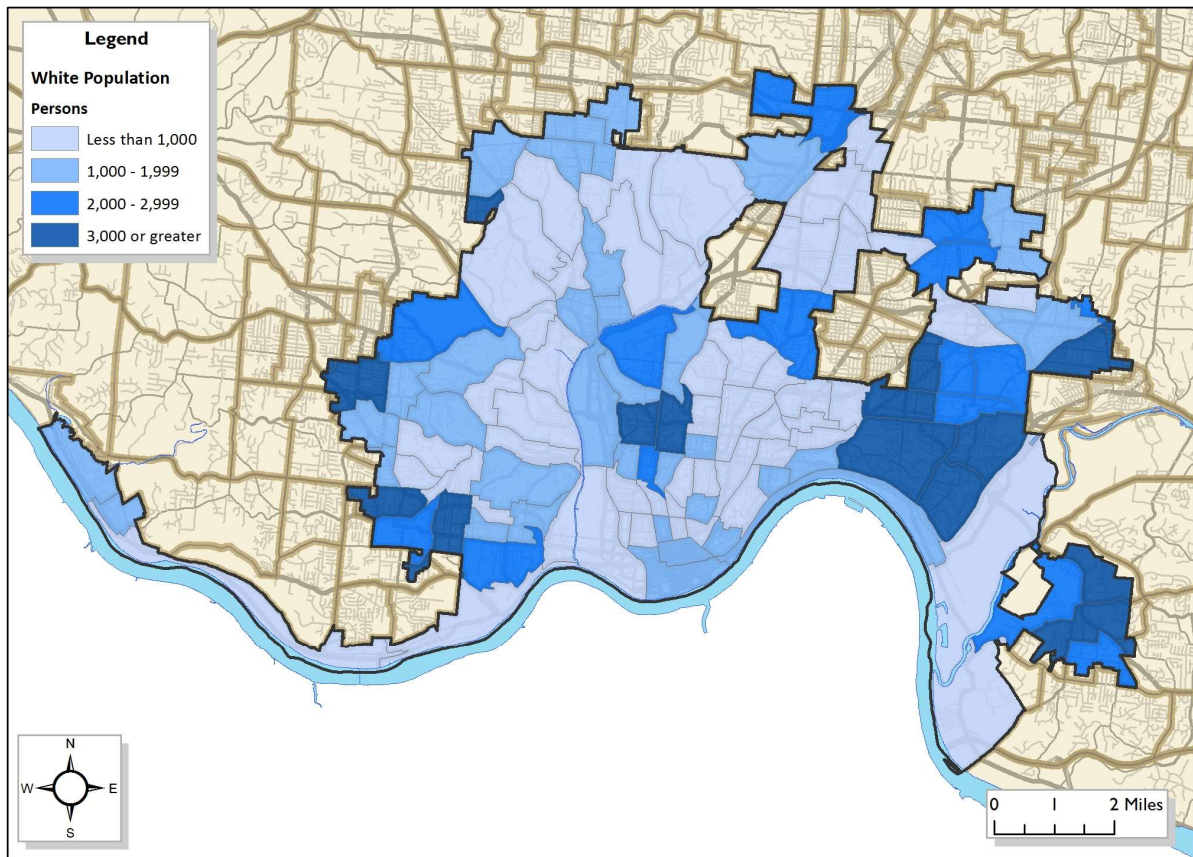
Asian Population (2017 ACS)

The Asian Population map indicates the following:

- The Asian population is primarily located in Clifton, CUF, University Heights, (collectively referred to as Uptown Cincinnati) clusters around where the universities and hospitals are primarily located; and
- There is a high concentration of the Asian population in the eastern neighborhood of Hyde Park.
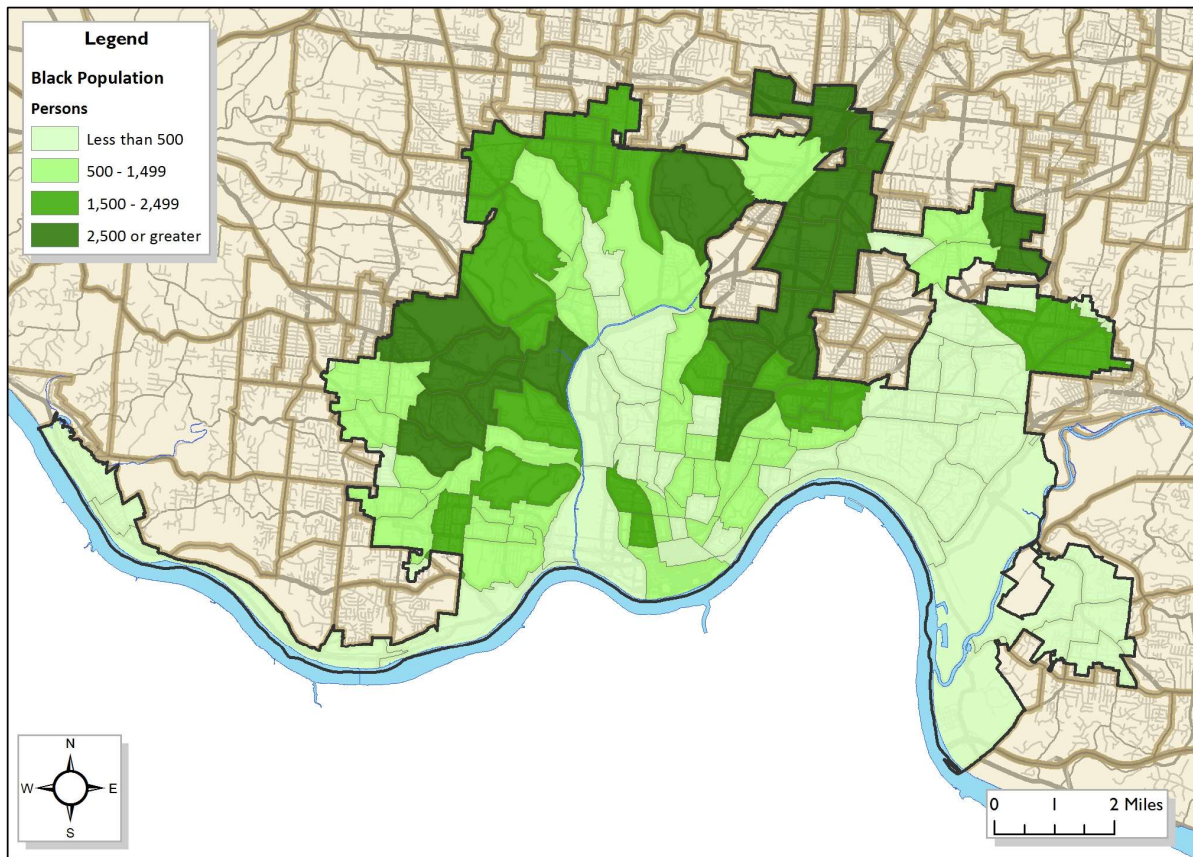
White Population (2017 ACS)

The White Population map indicates the following:

- The white population has high concentrations located in the far west side, Clifton, CUF, University Heights, (collectively referred to as Uptown Cincinnati), and eastern portions of the City;
- The outskirts of the City are primarily white population; and
- The neighborhoods of Hyde Park, Mt. Lookout, Madisonville, Mt Washington, Hartwell, western Westwood, West Price Hill, Clifton, and CUF have high concentration of the white population.

Black Population (2017 ACS)

The Black Population map indicates the following:

- The concentrations of the black population are found in the central of the city, in the neighborhoods of Evanston, Avondale, Bond Hill, Roselawn, Kennedy Heights, East Westwood, Villages at Roll Hill, North and South Fairmount, Millvale, northern and eastern Westwood, and Winton Hills; and
- The black population seems to be in higher concentrations along Interstate-75.

NA-35 Public Housing – 91.205(b)

Introduction

Totals in Use

				Vouchers			Special Purpose Voucher		
	Certificate	**Mod-Rehab**	**Public Housing**	**Total**	**Project-based**	**Tenant-based**	**Veterans Affairs Supportive Housing**	**Family Unification Program**	**Disabled ***
# of units vouchers in use	73,500	24,520	27,730	4,310	73,500	24,520	27,730	4,310	73,500

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

				Vouchers			Special Purpose Voucher	
	Certificate	**Mod-Rehab**	**Public Housing**	**Total**	**Project-based**	**Tenant-based**	**Veterans Affairs Supportive Housing**	**Family Unification Program**
Average Annual Income	--	5,138	9,933	10,634	9,261	10,634	9,760	10,319
Average length of stay	--	3	5	5	1	5	0	9
Average Household size	--	1	2	2	1	2	1	3
# Homeless at admission	--	0	30	1	--	1	--	--
# of Elderly Program Participants (>62)	--	5	956	905	61	824	12	4

				Program Type				
				Vouchers				
							Special Purpose Voucher	
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program
# of Disabled Families	--	7	988	2,703	61	2,570	49	6
# of Families requesting accessibility features	--	43	5,021	10,639	187	10,251	109	48
# of HIV/AIDS program participants	--	--	--	--	--	--	--	--
# of DV victims	--	--	--	--	--	--	--	--

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

				Program Type					
				Vouchers					
							Special Purpose Voucher		
Race	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White		6	414	1,178	41	1,084	33	6	4
Black/African American		37	4,582	9,438	145	9,145	76	42	6
Asian			9	8		8			
American Indian/Alaska Native			8	9		9			
Pacific Islander			8	6	1	5			
Other									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

				Program Type					
				Vouchers					
							Special Purpose Voucher		
Ethnicity	**Certificate**	**Mod-Rehab**	**Public Housing**	**Total**	**Project-based**	**Tenant-based**	**Veterans Affairs Supportive Housing**	**Family Unification Program**	**Disabled ***
Hispanic			46	90	4	84	2		
Not Hispanic		43	4,975	10,549	183	10,167	107	48	10
***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**									

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Cincinnati Metropolitan Housing Authority (CMHA) is planning on converting additional units from its existing and future asset management units to Section 504 compliance standards, according to CMHA's 2020 Annual Action Plan. These units will be located throughout Hamilton County providing additional accessibility options for the families served. CMHA's current plan is to convert the units into fully Section 504 compliant units where feasible. All new development efforts are expected to meet or exceed HUD's Section 504 accessibility requirements where feasible.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

During calendar year 2019, CMHA received 116 submissions for the transfers under the Violence Against Women Act (VAWA); 75 of the transfer requests were from the Asset Management program and 41 requests were from the Voucher Management program. All of these individuals/families sought a transfer from the present residence to another location in order to elude the predator. CMHA has developed its emergency transfer plan in response to the changes in VAWA. CMHA continues to work with the YWCA and Women Helping Women to provide admission preferences points to individuals who are survivors of domestic violence.

How these needs compare to the housing needs of the population at large

It is the current policy of the Cincinnati Metropolitan Housing Authority to provide for de-concentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. CMHA accomplished this by allowing its pool of applicants in the asset management program to have unfettered choice from the asset management waitlists for asset management housing. The applicant's choice of housing is based on the applicant's decision as to which location would best provide for housing in light of available employment, educational opportunities, family and community support. Additionally, the CMHA will support measures to raise the incomes of households that currently reside in its housing programs through the Family Self Sufficiency programs.

Discussion

In 2019, there were 7,443 families on CMHA's wait list for Section 8 tenant-based assistance. Of the families on the wait list, 99.3% are at extremely low-income levels, 53% are families with children, and 14.5% are families with disabilities. Also, there were currently 13,035 families on

the wait list for public housing. Of the families on the wait list for public housing, 86.5% are extremely low-income, 37% are families with children, and 8.6% are families with disabilities.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The City of Cincinnati, Hamilton County, Homeless Clearinghouse (CoC Board) and Strategies to End Homelessness (CoC Collaborative Applicant and Unified Funding Agent) have consistently utilized the Consolidated Plan as the primary documentation of the strategies, planning, and services being used to address homelessness, particularly chronic homelessness, in the City of Cincinnati and Hamilton County.

The Homeless Section of the Consolidated Plan has been developed for both the City of Cincinnati and Hamilton County, Ohio as part of the local HUD Continuum of Care for the Homeless (CoC) program of the combined jurisdictions. Pursuant to HUD's guidance and the community's method of conducting planning and facilitating processes for homeless, the jurisdictions have standardized elements within the Consolidated Plans, increasing coordination and reducing duplication of efforts.

The Homeless Clearinghouse (CoC Board) oversees CoC planning and gaps analysis, coordinates project outcomes review, priority setting, funding allocation, and monitors elements of the Consolidated Plan. The Homeless Clearinghouse annually reviews program performance in relation to HUD outcome priorities and utilizes outcomes data to propose changes to the local CoC program prioritization process and presents these outcome performance measures to CoC membership. Such performance-based prioritization is accompanied by community input to select projects to be included in the annual CoC application. The Homeless Clearinghouse also oversees allocation and planning processes for ESG funds and the monitoring of ESG-funded program performance.

The local homeless services system is working to reduce homelessness by doing the following:
1. Preventing as many households as possible from entering emergency shelter or sleeping unsheltered;
2. Improving the services that are available to people who are currently homeless; and
3. Offering solutions to homelessness through housing.

Several local initiatives include goals pertaining to each of these three elements, most notably the following:

1. **Solutions for Family Homelessness initiative**: In 2015, Strategies to End Homelessness, the Society of St. Vincent de Paul, Bethany House Services, Interfaith Hospitality Network of Greater Cincinnati, The Salvation Army, and the YWCA of Greater Cincinnati developed

the "Solutions for Family Homelessness" plan to identify how the community can proactively address the needs of families experiencing homelessness. The recommendations in the plan focused in four key areas (described in more detail above): prevention, capacity building, policy change, and housing.

2. **KEYS to a Future without Youth Homelessness initiative:** The local CoC for the homeless was one of the first ten in the nation to be selected by HUD to be a part of a national Youth Homelessness Demonstration Program. This led to the development of the "KEYS to a Future without Youth Homelessness" plan to prevent and end youth homelessness, as described in more detail above.

Preventing as many households as possible from entering emergency shelter or sleeping unsheltered:

Prior to 2009, homelessness prevention resources were largely absent in the community due to a lack of availability of funding for such activities. However, under the American Recovery and Re-investment Act (ARRA), stimulus funding was made available for homelessness prevention. When stimulus funding expired in 2012, the local community had to be more strategic and targeted in how remaining prevention resources were to be used going forward. The following activities are ongoing:

1. Shelter Diversion: State, City of Cincinnati, and United Way funding are being used to divert households at imminent risk of entering shelter or being unsheltered back into housing with services. Local Shelter Diversion programming is being run in partnership between the above-mentioned funders, 5 Emergency Assistance agencies, and Strategies to End Homelessness.

2. Supportive Services for Homeless Veterans and their Families (SSVF): Talbert House has been awarded SSVF funding for programming which prevents homelessness for veterans and their families.

3. Youth Aging out of Foster Care: A U.S. Department of Health and Human Services (HHS) funded effort is being led locally by Lighthouse Youth and Family Services to prevent homelessness among youth who have been in the Foster Care system and/or victims of human trafficking. This effort supports enhanced identification, data collection and services to youth formerly in the foster care system, as one-third of youth aging out of foster care experience homelessness. National studies have also shown that between 21 – 53% of homeless youth have histories of placement in foster care. In the local CoC

information is being gathered from homeless and at-risk youth regarding past and current foster care placements and being considered as a potential risk factor for homelessness.

4. Safe and Supported LGBTQ Youth Homelessness Prevention Initiative: Cincinnati/Hamilton County is one of only two communities in the country selected to participate in a national technical assistance initiative which will plan and implementation strategies for preventing LGBTQ youth from becoming homeless. This initiative is being led locally by Lighthouse Youth Services, and being conducted in cooperation with HUD, HHS, Department of Justice, Department of Education, and USICH.

Improving the services that are available to people who are currently homeless:

All of the following actions are being taken to improve services to people currently on the streets and in shelters:

1. Expanded Street Outreach Services: In 2019, street outreach services were expanded significantly with local non-profit organizations.

2. Child Services Coordinators: In 2018, family shelter operators, in partnership with Strategies to End Homelessness, put in place Child Services Coordinators in each family shelter. These staff assess the needs of homeless children and work to put in place services to address their unique educational, health and mental health needs, etc., services which will follow the child after their shelter stay has ended, reducing the likelihood of such issues leading to future episodes of homelessness for the family and/or that child.

3. Expanded access to Low Barrier Shelter/Seasonal Shelter:
   a. Winter Shelter: For the last eight years, Shelterhouse Volunteer Group, the Greater Cincinnati Homeless Coalition and Strategies to End Homelessness have partnered to add seasonal low-barrier winter shelter beds to the local emergency shelter system in an effort to ensure that anyone who is homeless and on the streets has access to a safe, warm place to sleep during the coldest months of the year, normally mid-December through February. This effort has primarily targeted single individuals who would have otherwise slept unsheltered and has played a role in the local CoC seeing a 43% reduction in the number of people sleeping unsheltered from 2013 – 2018. However, the need for increased availability of low-barrier shelter during other months of the year has led to Shelterhouse taking steps to expand the Winter Shelter into a year-round facility,

potentially further reducing the number of people sleeping unsheltered in the community.

b. <u>Summer Shelter</u>: Since 2017, local organizations have partnered to add seasonal family shelter beds to the local emergency shelter system to reduce the chances of families having to sleep unsheltered, as demand for family shelter is highest during the summer months. However, the shelter capacity added may still be inadequate and need further expansion.

4. <u>Property owner recruitment and retention</u>: In the local CoC on any given day there are between 100 – 200 households that are still in shelter or sleeping unsheltered despite having been offered a Shelter Diversion or CoC subsidy simply because they have not been able to find a property owner who is willing to rent them an appropriate housing unit.

Offering solutions to homelessness through housing:

All of the following actions are being taken to improve access to housing for people seeking to exit emergency shelter or unsheltered homelessness:

1. <u>Expanding Rapid Re-Housing (RRH)</u>: RRH is a nationally recognized best practice for quickly ending episodes of homelessness in a cost-effective way. RRH has become a high priority in the community:
   - Over the past 5 years, the proportion of CoC funding dedicated to Rapid Re-housing has increased and will continue to increase into the future.
   - State of Ohio Housing Crisis Response Program (HCRP) and Hamilton County ESG funding are also supporting RRH programs in the community.
   - Talbert House is receiving Supportive Services for Veteran Families (SSVF) funding to implement programs which rapidly transitioning Veterans and their families that are experiencing homelessness back into permanent housing.

2. <u>Permanent Supportive Housing (PSH)</u>:
   - Expanded PSH options: PSH is a nationally recognized best-practice for meeting the needs of disabled chronically homeless people. With a significant proportion of adults sleeping in shelters and unsheltered having at least one disabling condition, the continued expansion of PSH options will be necessary.
   - Targeting PSH to the chronically homeless: all Permanent Supportive Housing Programs applying for CoC funding demonstrate prioritizing available PSH housing capacity toward chronically homeless individuals and families.

3. <u>Coordination of Housing Resources</u>: The following are high-priority strategies geared toward making better, more strategic use of housing resources:

- Coordinated Entry: Coordinated Entry is the process by which people experiencing homelessness are assessed for vulnerability and given access to housing and assistance based on the level of need and the resources available in the community. Coordinated Entry Specialists match individuals and families to appropriate programs and resources as space become available. The agencies receiving referrals work to assist clients in obtaining permanent housing as quickly as possible, beginning the journey back to self-sufficiency.

- Coordinated Exit/Moving On Program: Through Coordinated Entry, homeless households that are most vulnerable to chronic homelessness are placed into housing programs that can meet the needs with a combination of intensive services and a rental subsidy. Once these households have been successfully re-housed and are stable in households an exit plan is needed to ensure housing stability and allow the housing program to help another household that is still homeless. A partnership has been developed between the local CoC and Public Housing Authority (Cincinnati Metropolitan Housing Authority) which has implemented a preference system for providing public housing for households that have been homeless. Households graduate from supportive housing for the homeless into a CMHA housing program, greatly increasing access to public housing resources for homeless households and allowing supportive housing programs to serve more people with the same level of resources.

4. <u>Aftercare</u>: Formerly homeless families and individuals who have received emergency shelter and/or supportive housing often still have needs approaching the end of the rental assistance period, including employment and ongoing access to mainstream benefits and services. Unfortunately, shortly after a household exits shelter or a supportive housing program, case management services provided as a part of that program also end. This leaves the formerly homeless households to negotiate these systemic issues without assistance. A point of emphasis in the local CoC has been to develop Aftercare services, which can follow households after exiting the system for an indeterminate period of time, and which can be available to help households when/if there is difficulty maintaining housing months or even years after exiting homelessness, and potentially preventing additional episodes of homelessness.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless

individuals and families, families with children, veterans and their families, and unaccompanied youth):

On any given night there are 750 – 800 individuals in emergency shelter or unsheltered within the CoC jurisdiction. However, the unduplicated number of people sleeping in shelters or unsheltered over the entirety of CY 2018 was 7,036. This indicates that the homeless population turns over almost ten times per year. Additionally, with 86% of the homeless population sleeping exclusively in a shelter during the course of the year, and an average stay lasting about 35 – 45 days, most people are experiencing short-term homelessness with the CoC.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	31%	41%
Black or African American	63%	52%
Multi-racial	4	<6%
Other	1%	1%
Unknown	<1%	1%
Ethnicity:	**Sheltered:**	**Unsheltered (optional)**
Hispanic	4%	0%
Non-Hispanic	96%	100%

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Families in need of family shelter contact the Central Access Point (CAP) helpline to access both Shelter Diversion and family emergency shelter services. In addition, families that are fleeing domestic violence contact the YWCA of Greater Cincinnati for services.

In 2018, 243 families were served in Shelter Diversion programs and another 544 were served in emergency shelter. However, even with these numbers served, over half (56%) of all families that reached out to CAP for assistance were not provided with either Shelter Diversion or emergency shelter services.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

In 2018, the population of people served unsheltered and in emergency shelters in Cincinnati/Hamilton County was as follows: 62% Black, 32% white, 4% multiracial, 1% other and <1% unknown.

As Hamilton County is approximately 26% black, and for any one group to be overrepresented among the homeless population, as black residents are, indicates that a number of factors might be disproportionately negatively affecting black residents within the jurisdiction.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Discussion:

Unsheltered homelessness: From 2013 through 2018, the community has seen a 43% decrease in the number of people living unsheltered on the streets or in places unfit for human habitation. With 14% of the homeless population sleeping unsheltered during the course of the 2018, compared to a national average of 34% of the homeless population unsheltered according to the National Alliance to End Homelessness, Cincinnati/Hamilton County has excelled at bringing homeless people in off the streets.

Emergency shelter: The number of people entering emergency shelter in Cincinnati/Hamilton County remained consistent from 2013 (6,661 people) through 2017 (6,670 people). However, from 2017 to 2018, the community saw the number of people entering emergency shelters decrease by 2.4% (from 6,670 to 6,509).

Taking both unsheltered homeless people and emergency shelter into consideration as a whole, Cincinnati and Hamilton County saw a 2.2% decline in overall homelessness from 2017 to 2018.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	
Area incidence of AIDS	
Rate per population	
Number of new cases prior year (3 years of data)	
Rate per population (3 years of data)	
Current HIV surveillance data:	
Number of Persons living with HIC (PLWH)	4,231
Area Prevalence (PLWH per population)	194.1
Number of new HIV cases reported last year	283

Table 26 – HOPWA Data

> **Data Source:**   CDC HIV Surveillance

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	33
Short-term Rent, Mortgage, and Utility	44
Facility Based Housing (Permanent, short-term or transitional)	6

Table 27 – HIV Housing Need

> **Data Source:**   HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Describe the characteristics of special needs populations in the community:

Housing Opportunities for Persons with HIV/AIDS (HOPWA) funding is awarded to the City of Cincinnati as the entitlement grantee for the Greater Cincinnati Area Eligible Metropolitan Statistical Areas (EMSA). This area includes Brown, Butler, Clermont, Hamilton and Warren in Ohio; Boone, Bracken, Campbell, Gallatin, Grant, Kenton and Pendleton Counties in Kentucky and Dearborn, Franklin and Ohio in Indiana.

To date, there are 4,185 cumulative cases of AIDS reported in the EMSA. Over the past several years, the Northern Kentucky Health Department, Caracole and The Center for Respite Care have been the primary providers of housing and services for this population. Through HOPWA, these agencies have been funded to provide emergency shelter, permanent housing, case management, housing placement and short-term rent, mortgage and utilities assistance

(STRMU). Shelterhouse Volunteer Group became a HOPWA-funded agency in 2018, providing supportive services to assist HIV+ individuals who are living in emergency shelter obtain and maintain housing.

County	Number Living with HIV	Rate in CY 2018 (for living with)	Population July 2018*
Ohio**			
Brown	Not reported	73.4	43,602
Butler	463	121.1	382,378
Clermont	161	78.4	205,466
Hamilton	3,213	393.4	816,684
Warren	162	69.8	232,173
Approximate Total:	**3,999**	**238.0**	**1,680,303**

County	Number Living with HIV	Rate in CY 2018 (for living with)	Population July 2018*
Kentucky***			
Boone	103	78.3	131,533
Bracken	5	60.7	8,239
Campbell	130	139.6	93,152
Gallatin	1	11.3	8,832
Grant	24	95.5	25,121
Kenton	318	191.5	166,051
Pendleton	7	48.2	14,529
Approximate Total:	**588**	**64.4**	**447,457**

County	Number Living with HIV	Rate in CY 2018 (for living with)	Population July 2018*
Indiana****			
Dearborn	15	30.3	49,568
Franklin	8	35.2	22,736
Ohio	<5	<85.6	5,844
Approximate Total:	**<28**	**<35.8**	**78,148**

Notes:

*Source: U.S. Census Bureau

** Ohio data taken from Ohio Department of Health. Data as of June 2019. Rate data represents 2018.

https://odh.ohio.gov/wps/portal/gov/odh/know-our-programs/hiv-aids-surveillance-program/resources/clermont-county-hiv-surveillance-data-tables

*** Kentucky data taken from Cabinet for Health and Family Services Kentucky HIV/AIDS Surveillance Report June 2018, https://chfs.ky.gov/agencies/dph/dehp/hab/Documents/AnnualReport2018.pdf

**** Indiana data taken from Indiana State Department of Health's Indiana Persons Living with HIV Disease as of December 31, 2018. https://www.in.gov/isdh/files/Indiana%20Persons%20Living%20with%20HIV.pdf

What are the housing and supportive service needs of these populations and how are these needs determined?

Over the last five years, the type of services needed to serve the HIV+ population have changed, with increased demand for services to be provided to the eligible population residing in emergency shelters. In addition, there has been increased need for site-based permanent supportive housing (PSH) in which homeless HIV+ clients can be more readily stabilized in services and on appropriate medication. As a result, Shelterhouse, the area's largest emergency shelter provider has begun receiving HOPWA funding to provide services to eligible clients in emergency shelter, and Caracole has expanded the availability of site based PSH.

Services for homeless and unstably housed individuals living with HIV/AIDS are tracked by the HOPWA-funded agencies. The results are shared with the HOPWA Advisory Committee which meets at least annually to review HOPWA activities and determine the allocations for the funded agencies. The committee is charged with establishing priorities for this population with respect to HOPWA funds. The committee is led by the staff of Strategies to End Homelessness and comprised of staff from the City, representatives from the HOPWA funded agencies as well as professionals in the community who have an interest and understanding of the needs of this population.

With respect to HIV/AIDS, the City will maintain the existing housing and service programs through the network of AIDS service providers and assist the organizations in continuing efforts to respond to the changing demographics of those living with HIV/AIDS.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area (EMSA):

Discussion:

As of CY 2018, a total of 4,185 cases of AIDS have been reported in the HOPWA EMSA. The number of new cases reported in most recent reports totaled 113. Of the 4,185 cases of AIDS reported, 21 were children.

The Center of Respite Care provides temporary housing and supportive services to persons in transitional housing program, to stabilize and assist the individuals with moving on to permanent housing.

Caracole offers a variety of services to persons living with HIV, including multiple site-based and scattered-site housing options. Short-term rental and mortgage assistance (STRMU) offers a short-term, needs-based intervention to prevent homelessness and promote housing stability for individuals living with HIV/AIDS, and Medical Case Management helps limit barriers to accessing care, stabilize and improve clients' health and well-being while empowering clients to become independent and self-sufficient. Caracole serves more than 1,600 individuals on a daily basis in the housing and case management programs and last year, served an additional 7,763 people in the education program and provided HIV tests to an additional 2,087 individuals.

Shelterhouse offers a variety of emergency shelter-based services to single individuals who are homeless and living with HIV, as well as working to connect such individuals to other services, both HIV-related and otherwise, in the community.

The Northern Kentucky Health Department (NKY HEALTH) provides a variety of public health services to the community. NKY HEALTH administers core and support services for people living with HIV disease as part of the Kentucky Department for Public Health, Kentucky HIV/AIDS Care Coordination Program (KHCCP). Through the KHCCP program NKY HEALTH serves the following Kentucky counties in the MSA: Boone, Kenton, Campbell, Grant, and Bracken. NKY HEALTH's comprehensive services and housing support programs have primary goals of undetectable viral loads and housing stability.

An increase in the HIV infection rate is anticipated because of the heroin epidemic in this region. It is anticipated that those newly infected with HIV due to intravenous drug use will require harm reduction, treatment and housing services. The HOPWA Committee and the agencies funded will continue to explore trends and patterns and determine what services are needed to respond to shifting demographics and emerging needs.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The acquisition, construction, reconstruction, rehabilitation, or installation of public facilities and improvements are eligible activities under the Community Development Block Grant program. Typically, the majority of City of Cincinnati owned public facilities are supported by non-Federal resources. Several CDBG-funded programs address public facilities, such as the Neighborhood Business District Improvement Program (NBDIP) and Commercial and Industrial Redevelopment.

How were these needs determined?

NBDIP applications received on a competitive basis annually from Neighborhood Business District Associations. Commercial and Industrial Redevelopment receives applications from business throughout the year to address any needs of the business, including infrastructure improvement.

Describe the jurisdiction's need for Public Improvements:

Infrastructure improvements (construction or installation) including, but not limited to streetscapes, including sidewalk accessibility, curbs, and water and sewer lines; and neighborhood facilities including, recreational facilities, parks, and playgrounds. The activities have included: energy efficiency improvements; handicapped accessibility improvements; and architectural design features and other treatments aimed at improving aesthetic quality, such as sculptures and fountains.

How were these needs determined?

The needs are determined through receiving requests from the community and prioritizing the project based on need and funding availability.
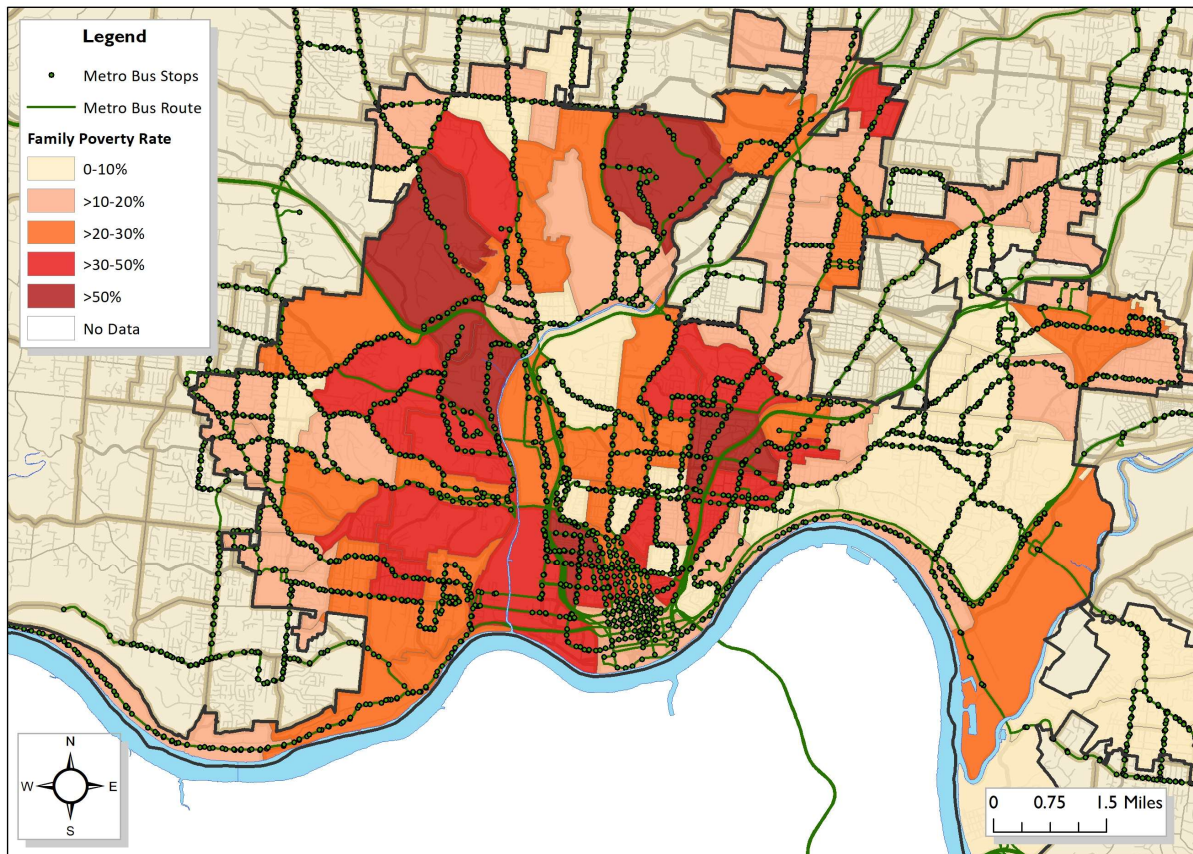
Describe the jurisdiction's need for Public Services:

The City of Cincinnati has several public service programs that are funded through CDBG: Youth and Young Adult Employment Program, Emergency Mortgage Assistance, Tenant Representation, Blueprint For Success, Fair Housing Services, Hand Up Initiative, Housing Choice Mobility, and Project Lift. There are also non-Federal resources funding a rental assistance program for low-income households.

How were these needs determined?

Metro Bus Service and Family Poverty Rate (2017 ACS)

The Metro Bus Service and Family Poverty Rate map illustrates a correlation to low-income poverty rates residing along the bus stops. Low-income working families may rely heavier on public transportation not only to get to work, but also to access the many activities that are required to maintain employment, such as traveling to child-care providers, health care facilities, and job training sites. The public service programs provided also provide supportive services in order to address this disparity.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The discussion in the Housing Market Analysis demonstrates that the City of Cincinnati should prioritize the following strategies:

- Prioritize the rehabilitation of existing rental units for low-income renters, and whenever feasible, target units serving extremely low-income households;
- Support new construction of low-income rental housing through Low Income Housing Tax Credit (LIHTC) program, targeting populations of greatest need when feasible, such as families, seniors, and special populations;
- Promote development of mixed-income housing and mixed-income communities to combat segregation and poverty concentration;
- Provide rental subsidies and supportive services for low-income and special needs populations;
- Rehabilitate single-family homes for affordable homeownership;
- Combine code enforcement with housing repair services for the elderly, low-income, and disabled;
- Demolish condemned vacant buildings where rehabilitation costs exceed market value and the property is not historically or architecturally significant;
- Strategically reuse vacant lots to create infill housing, urban gardens, adopt-a-lot, etc. given the large number of vacant lots that still exists in many parts of the City following concentrated demolition programs of the past decade;
- Provide rehabilitation of units and other services to households with children at-risk of lead-based paint hazards;
- Provide down-payment assistance to moderate- to low-income renters who are potential candidates to move into homeownership;
- In order to increase the supply of housing, explore ways to reduce the cost of residential development throughout the City through elimination or relaxation of any unnecessarily density limitations or off-street parking requirements that may otherwise make construction or renovation cost prohibitive;
- In order to increase the supply of affordable housing, explore creating zoning incentives (such as density bonuses) for the development of affordable housing;
- Explore ways to increase funding for the newly created Cincinnati Housing Trust Fund; and

- The Cincinnati Metropolitan Housing Authority (CMHA) manages a large portfolio of scattered site of single-family homes, duplexes and 4-unit buildings and the City should continue to support CMHA projects when possible.

MA-10 Number of Housing Units – 91.210(a),(b)(2)

Introduction

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	62,705	38.7%
1-unit, attached structure	7,557	4.7%
2-4 units	34,267	21.2%
5-19 units	33,065	20.4%
20 or more units	24,118	14.9%
Mobile Home, boat, RV, van, etc.	169	0.1%
Total	161,881	100.0%

Table 28 – Residential Properties by Unit Number
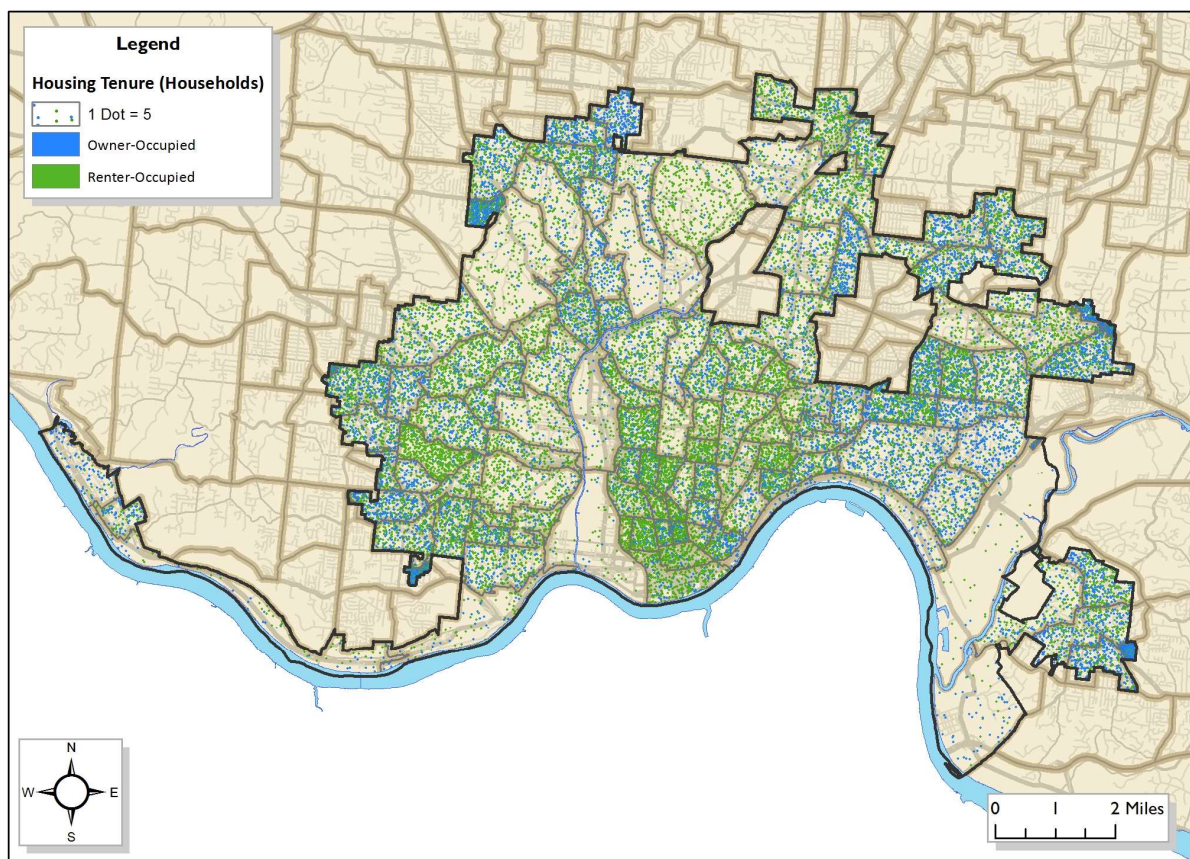
Data Source: 2013-2017 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	70	0.14%	4,581	5.4%
1 bedroom	2,012	3.92%	34,316	40.5%
2 bedrooms	14,535	28.30%	30,267	35.7%
3 or more bedrooms	34,750	67.65%	15,649	18.5%
Total	51,367	100.00%	84,813	100.0%

Table 29 – Unit Size by Tenure

Data Source: 2013-2017 ACS

Housing Tenure (2017 ACS)

The Housing Tenure map indicates the following:

- The areas where renters are concentrated are the same as the low-income census tracts; and
- With 42% owner occupied units in 2010; there has been a shift from homeownership to renter occupancy, with 37% owner occupied units in 2017.

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Generally, the federal resources are utilized for the entire City Cincinnati in accordance with the program requirements of each grant as the need for services is present throughout the City's neighborhoods. CDBG targets <80% AMI, with at least 51% of all assisted units provided to low-to moderate-income households. All HOME funds assist the very low to extremely low-income occupants. A 5-year target of 300 units are expected to be assisted directly to be provided for low-income households. An additional 5,000 low-income individuals will be directly assisted through supportive services provided.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

There has been an overall loss of residential units over the last 5 years in the City of Cincinnati. In 2010, there were over 167,000 residential units compared to 2017 at 161,881. There was a substantial increase in vacancy rates after the 2008 Recession as well as an increase in demolitions. Single-family detached homes account for approximately one-third of all properties, which has been consistent over the last few years. The percentage of large, 20 units or more, has increased by approximately 2% from 2010.

Does the availability of housing units meet the needs of the population?

- The City's homeless population is served by:
  - 694 year-round emergency shelter beds, 246 seasonal shelter beds and 70 overflow shelters beds, which were utilized by 6,509 people in 2018;
  - 221 transitional housing beds, which were utilized by 779 people in 2018;
  - 1,187 rapid re-housing beds, which were utilized by 3,073 people in 2018; and
  - 2,410 permanent supportive housing beds, which were utilized by 2,459 people in 2018 and there are 60 additional permanent supportive housing beds under development.
- In 2018, a total of 7,036 people slept in an emergency shelter or unsheltered within the CoC. 86% of the homeless population within the CoC slept exclusively in shelters. 7% slept exclusively unsheltered, and 7% went back and forth between being sheltered and unsheltered throughout the calendar year.
- Within the CoC, Strategies to End Homelessness (STEH) began system-wide homelessness prevention services in 2009, supported by HUD Homeless Prevention and Rapid Rehousing Program funding. This funding ended in 2012, but STEH continued providing homelessness preventions services, following a more targeted Shelter Diversion model, supported by non-HUD funding. In 2018, 1,017 people received Shelter Diversion services.
- In total, inclusive of all people served in shelter diversion, unsheltered, in emergency shelter, transitional housing and permanent housing (which includes both rapid re-housing and permanent supportive housing), the homeless services system served 12,240 people, including 1,365 families.

Describe the need for specific types of housing:

The future housing needs of Cincinnatians is closely linked to future population changes. The City experienced flat population growth in recent years. After several decades of decline, population

growth has recently begun to stabilize. If the City continues to experience a flat or very slow growth scenario, its housing needs will include the following:

- Low maintenance housing options for seniors who want to age in place, with easy access to in-home services;
- Housing with accessibility improvements for the City's growing senior population, as well as persons with disabilities;
- Housing that will convince first-time buyers to choose the City as their home; and
- Subsidized rental options for households unable to afford market rate rentals.

Discussion

In summary, Cincinnati's housing stock includes a greater proportion of multi-family and renter-occupied housing units as compared to peer cities. These facts illustrate the need to prioritize the rehabilitation of existing multi-family units. Taken in conjunction with the City's decline in population since 1950, these facts also suggest the need to right-size the City through the selective demolition of blighted housing units where appropriate.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Cost of Housing

	Base Year: 2010	Most Recent Year: 2017	% Change
Median Home Value	$129,700	$124,200	-4.24%
Median Contract Rent	$496	$566	+14.1%

Table 30 – Cost of Housing

Data Source: 2010 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Rent Paid	Number	%
Less than $500	19,288	22.7%
$500-999	46,792	55.2%
$1,000-1,499	12,457	14.7%
$1,500-1,999	2,488	2.9%
$2,000 or more	1,442	1.7%
No cash rent	2,346	2.8%
Total	84,813	100.0%

Table 31 - Rent Paid

Data Source: 2013-2017 ACS

Housing Urban Development Area Median Family Income = HAMFI

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	12,995	--
50% HAMFI	42,765	6,890
80% HAMFI	66,425	15,850
100% HAMFI	--	21,645
Total	122,185	44,385

Table 32 – Housing Affordability

Data Source: 2013-2017 CHAS

Monthly Rent

Monthly Rent ($)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent (FMR)	$527	$613	$806	$1,125	$1,316
High HOME Rent	$527	$613	$806	$1,125	$1,316
Low HOME Rent	$527	$613	$806	$971	$1,083

Table 33 – Monthly Rent

Data Source: HUD FMR and HOME Rents

The U.S. Department of Housing and Urban Development (HUD) annually estimates fair market rents (FMRs) for Office of Management and Budget (OMB) defined metropolitan areas. High HOME Rent is HUD's definition of affordability for a household at or below 60% Area Median Income (AMI) and Low HOME Rent is HUD's definition of affordability for a household at or below 30% AMI. The rents assume 1.5 individuals per bedroom. Family affordability is a concern for large units where there is a substantial gap between market rents and affordable rent for 30% AMI households.
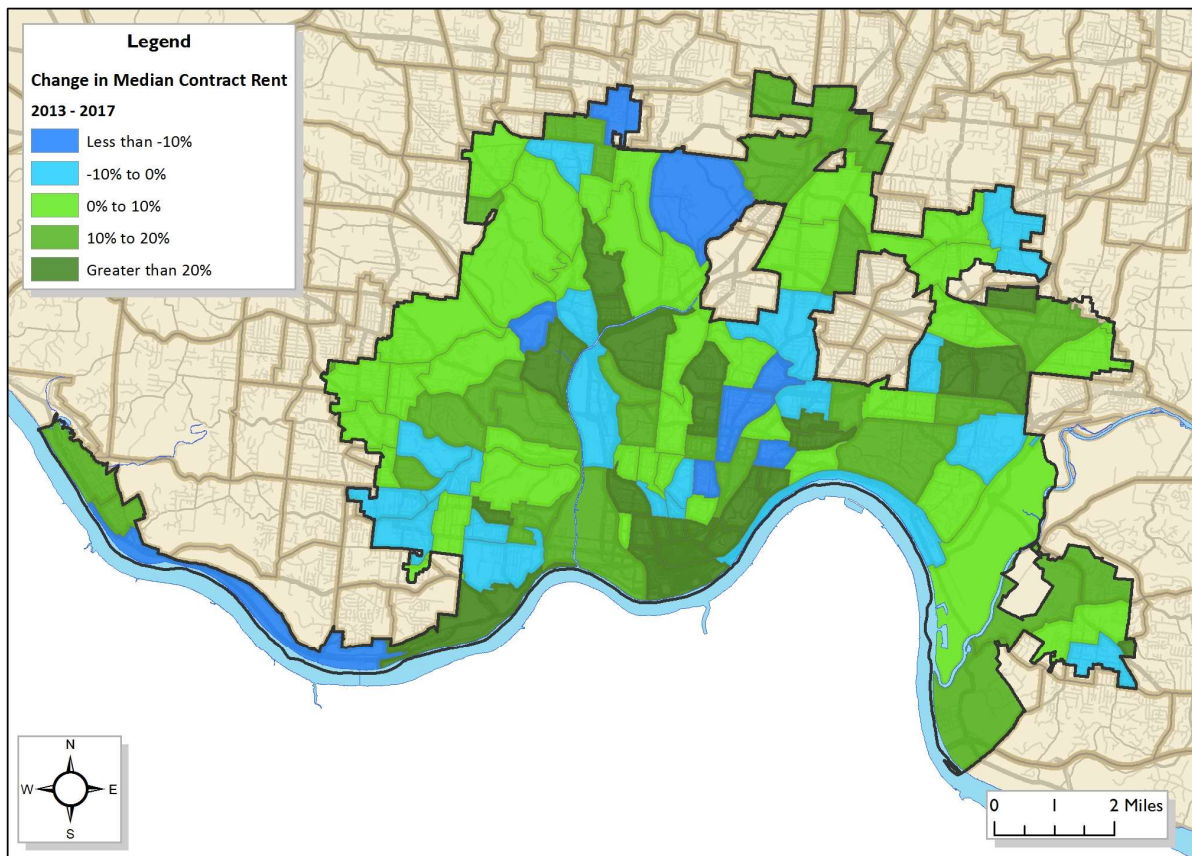
Median Contract Rent (2017 ACS)

Legend

Median Contract Rent

Dollars
- Less than $500
- $500 - $699
- $700 - $899
- $900 or greater

The Median Contract Rent map closely resembles the Population By Race and Ethnicity map, urban core has the highest rents and indicates the following:

- Rents are low throughout the City with the exception of the east side, downtown, and Over-the-Rhine urban care; and
- Only the southern portions of the urban core are experiencing high rents whereas the northern urban core has very low rents.

Rent Change 2013 - 2017 (ACS)

The Rent Change map indicates that the majority of the City experienced rent stabilized or an increase in rents.

Is there sufficient housing for households at all income levels?

The 0 – 30% AMI is the most poorly served demographic and the highest cost burdened households. The HUD Office of Policy Development and Research Housing Market Profiles as of November 1, 2019 states that renter household growth has contributed to declining vacancy rates and increasing rents in the Cincinnati metropolitan statistical area since 2016. Also, vacancy rates are currently at a historic low. The overall rental housing market (including single-family homes, townhomes, mobile homes, and apartments) is currently balanced in the Cincinnati

metropolitan area, with an estimated 7.0% vacancy rate in 2019, down from 11.8-percent in April 2010.

How is affordability of housing likely to change considering changes to home values and/or rents?

According to the U.S. Department of Housing and Urban Development's Office of Policy Development and Research Housing Market Profiles from November 2019, new and existing home sales prices in the Cincinnati metropolitan area have increased every year since 2013. Existing sales price is up 4% and average rent increased more than 3% in the Cincinnati metropolitan area. Income increases are not comparable to increases in rents and housing prices. Currently, the demand for housing that is affordable to low-to-moderate income households outpaces the supply of affordable units. This has resulted in a severe lack of affordable housing units in the city, especially among households experiencing the greatest financial hardships.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact the strategy to produce or preserve affordable housing?

With the affordable residential housing developments, rents must be subsidized for low income occupants. The HOME rents are calculated based on 1.5 individuals per bedroom utilizing the greater metropolitan area's average income. At minimum wage, what a household can actually afford is much less than the established HOME and fair market rents. The eligible metropolitan statistical area is higher than the City median income. The area median income is dependent on the number of individuals, not the increased 1.5 per bedroom.

Discussion

In Ohio, a household needs to earn $15.73 an hour, working full-time, to afford a 2-bed rental at FMR without spending more than 30% of their income. This is well above the national minimum and state minimum wages. In Cincinnati, a household needs to earn $17.00 an hour ($35,360 annually) to afford 2-bed at FMR (which is $884 a month). The Cincinnati estimated hourly mean renter wage is $15.32, at which monthly affordable rent is $797. For CY 2019, 30% of AMI in Cincinnati is $18,150 for one individual; for a family of four, 30% AMI is $26,200.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Cincinnati's housing stock is predominantly older with 91% of owner-occupied housing and 86% of renter-occupied housing was built before 1980, and 64% of owner-occupied housing and 43% of renter-occupied housing was built before 1950.

Definitions

The City of Cincinnati defines "Standard" housing as a unit that meets local and state property maintenance and zoning codes. Housing that is substandard but suitable for rehabilitation means that the unit is in poor condition, but it is both structurally and financially feasible to rehabilitate. The "Conditions" are defined as lacks complete kitchen facilities, lacks complete plumbing facilities, more than 1.5 persons per room, and cost burden over 50%. The following outline key HUD definitions:

- HAMFI: The acronym stands for HUD Area Median Family Income. This is the median family income calculated by HUD for each jurisdiction, in order to determine Fair Market Rents (FMRs) and income limits for HUD programs;
- Household: HUD uses the Census designation of households, which is all people living in a housing unit. Members of a household can be related (see family) or unrelated;
- Household Income: The CHAS tabulations use adjusted household income, which includes the income of all members of the household at the time of the survey;
- Family: HUD uses the census designation of family, which is related individuals living in the same household;
- Housing Problems: There are four housing problems in the CHAS data: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened, which a household is determined to have a housing problem if there exists 1 or more of these 4 problems;
- Overcrowding: More than 1 person per room;
- Severe overcrowding: More than 1.5 persons per room;
- Cost burden: Monthly housing costs (including utilities) exceed 30% of monthly income;
- Severe cost burden: Monthly housing costs (including utilities) exceed 50% of monthly income;
- Elderly: HUD defines elderly as age 62 and up; and
- Disabled: HUD defines disabled as having a "mobility or self-care limitation".

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	14,883	29	36,923	47
With two selected Conditions	280	1	1,847	2
With three selected Conditions	38	0	220	0
With four selected Conditions	0	0	0	0
No selected Conditions	36,526	71	39,338	50
Total	51,727	101	78,329	99

Table 34 - Condition of Units
   Data Source: 2009-2013 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2014 or later	107	0.2%	487	0.6%
2009 to 2013	400	0.8%	1,036	1.2%
2000 to 2009	1,614	3.1%	3,510	4.1%
1980 to 1999	3,267	6.4%	9,790	11.5%
1960 to 1979	6,929	13.5%	25,613	30.2%
1940 to 1959	12,161	23.7%	18,202	21.5%
1939 or earlier	26,889	52.3%	26,175	30.9%
Total	51,367	100.0%	84,813	100.0%

Table 35 – Year Unit Built
   Data Source: 2013-2017 CHAS

Median Year Built (2017 ACS)

The Median Year Built map indicates the following:

- Neighborhoods that are closest to the urban core, the northern half of Downtown, Over-the-Rhine, Mount Auburn, and Mount Adams, contain older housing stock;

- Older suburban neighborhoods such as Camp Washington, Northside, Clifton, Walnut Hills, and Hyde Park also contain a majority of units built before 1940;

- Many of these neighborhoods have benefited from high-quality, historic housing that may be redeveloped into marketable units;

- Several west side neighborhoods such as Westwood and Mount Airy contain a more recent, but lower quality housing stock, built largely after 1960;

- The buildings in several of the west side neighborhoods are rapidly aging and due to their distance from Downtown are not as desirable as many redeveloped historic units or new units coming on the market in neighborhoods closer to Downtown; and

- As a result, these neighborhoods may experience increased disinvestment and population decline as the housing stock continues to age and deteriorate.
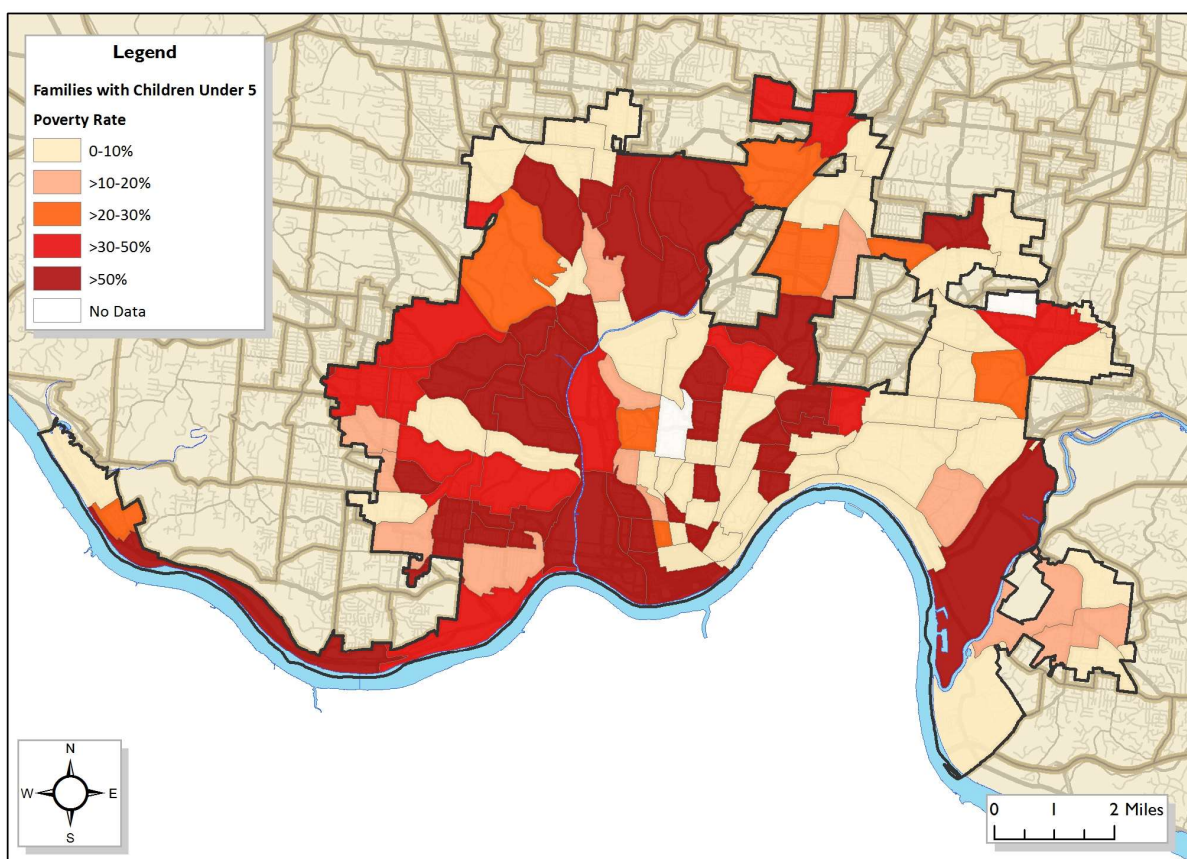
Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	**%**	**Number**	**%**
Total Number of Units Built Before 1980	46,487	90%	66,606	85%
Housing Units build before 1980 with children present	2,330	5%	855	1%

Table 36 – Risk of Lead-Based Paint

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)

The data presented by the HUD 2013 – 2019 Comprehensive Housing Affordability Strategy (CHAS) lists 5% of owner-occupied buildings built before 1980 having children present and 1% rental buildings built before 1980 only having children, which may not represent actual circumstances in the community.

Families with Children Under 5 Poverty Rate (2017 ACS)

Children under 18 in City by Age

Age	Percentage of 65,047 children
Under 6 years	39.4% (~25,629)
6 to 11 years	33.0% (~21,466)
12 to 17 years	27.7% (~18.018)

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	N/A	N/A	1,659
Abandoned Vacant Units	N/A	N/A	N/A
REO Properties	N/A	N/A	N/A
Abandoned REO Properties	N/A	N/A	N/A

Table 37 - Vacant Units

Real estate owned, or REO, is a term used in the United States to describe a class of property owned by a lender—typically a bank, government agency, or government loan insurer—after an unsuccessful sale at a foreclosure auction. The total number of vacant units provided are the total number of buildings ordered to be kept vacant by the City of Cincinnati Department of Buildings and Inspections as of CY 2019.

Vacancy Rate (2017 ACS)

The Vacancy Rate map indicates the following:
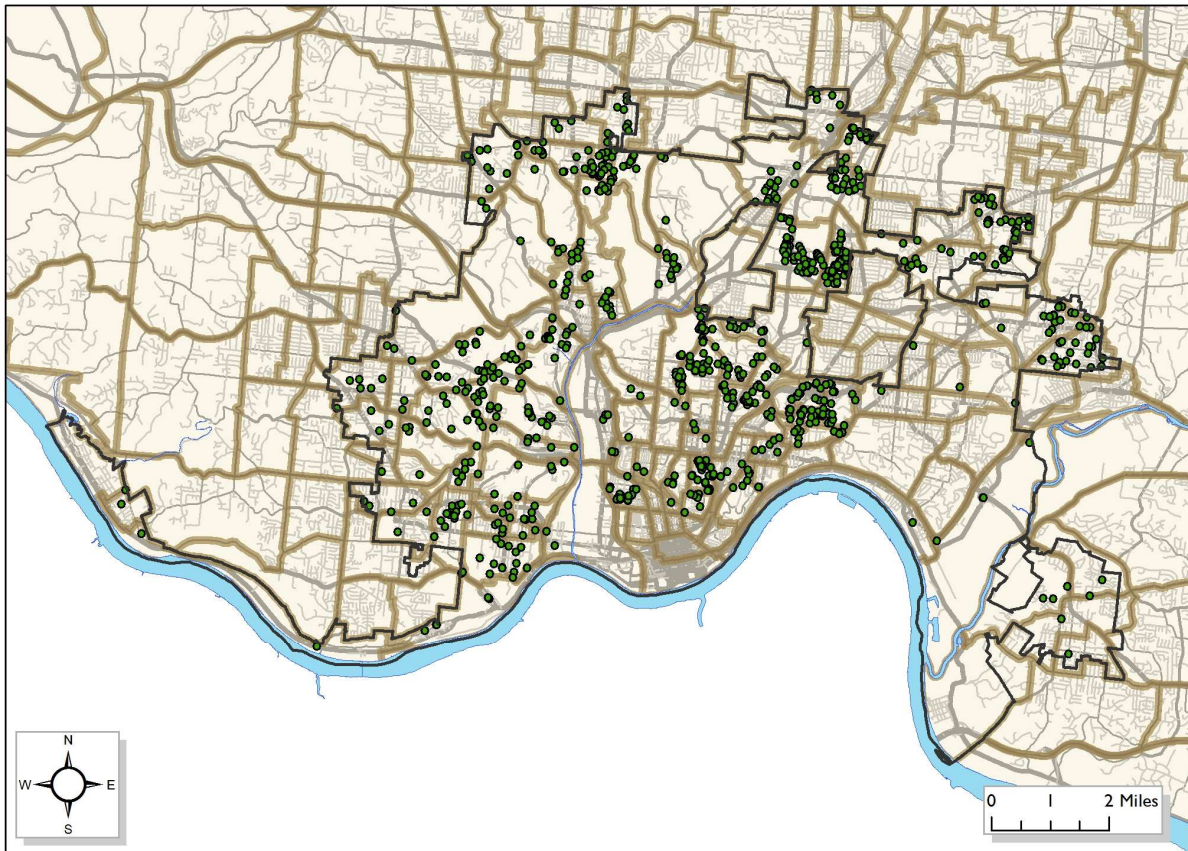
- Vacancy rates remain high in Cincinnati's near-downtown neighborhoods, specifically Over-the-Rhine;
- With renewed investment in these neighborhoods, it is expected that vacant units will decrease in the near future;
- Overall, the City's east side neighborhoods continue to experience distinctly lower vacancy rates than the west side;
- Vacancy rates remain high in West Side neighborhoods such as Lower Price Hill, East Price Hill, North and South Fairmount, South Cumminsville, and especially Mount Airy; and
- Many of the west side neighborhoods do not contain a prevalence of high-quality housing stock and proximity to Downtown that has assisted spur development in central neighborhoods.

Need for Owner and Rental Rehabilitation

Cincinnati's age of housing stock and condition of units indicates a significant need for renovation of both owner-occupied and renter-occupied housing. Because of the age and condition of the

city's housing stock, the renovation costs are generally assumed to be very high and often cost prohibitive without subsidy.

Housing Repair Services (2018)

The Housing repair Services map indicates the following:

- With respect to owner-occupied housing in need of renovation, the map of repairs made through housing repair services indicates areas of significant need (including financial need) primarily in Roselawn, Bond Hill, Kennedy Heights, Madisonville, Evanston, Walnut Hills, Avondale, Mt. Auburn, Price Hill, Westwood, Northside, and College Hill.

Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards

Approximately 90% of the City's housing stock was built before 1980, which 1978 is the year that lead-based paint was outlawed. The risks of lead-based paint hazards are severe in the City of Cincinnati. According to the Ohio Department of Health (ODH), less than 1% of children tested positive for high levels of lead in their blood in 2012 compared to roughly 7.5% in 1999. Additionally, twice as many children were screened in 2012 when compared to 1999.

In 2012, ODH predicted the greatest probability of blood lead levels of 5 µg/dL or greater in the Hamilton County area is 45.83% in census tract 9, the Over-the-Rhine neighborhood, located in the City's historic urban core. ODH also reports a total of 63,464 children under the age of 6 in Hamilton County are at-risk for lead poisoning. The City of Cincinnati ranks second behind Cleveland as having the most childhood lead poisoning cases in Ohio.

Although not a lead-based paint hazard, in the City of Cincinnati, an estimated 16,572 residences have a lead service line for their drinking water. Approximately 8% of these residences have been tested for the presence of lead in the drinking water, with the action level of concern at 15 ppb. The City of Cincinnati stopped utilizing lead service lines in 1927.

Discussion

The Condition of Housing Section of the Housing Market Analysis indicate the following needs:

- Housing services are necessary for low-income homeowners, including the elderly, and low-income renters, focusing on disabled residents;
- Demolish vacant buildings where rehabilitation costs exceed market value and the property is not historically or architecturally significant; and
- Rehabilitation of units and other services to households with children at risk of lead-based paint hazards are needed.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Totals Number of Units

				Program Type					
				Vouchers					
							Special Purpose Voucher		
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant -based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	44	5,251	11,176	265	10,911	834	369	0
# of accessible units	-	-	-	-	-	-	-	-	-
***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**									

Table 38 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

*Includes non-elderly disabled, mainstream one-ear, mainstream five-year, and nursing home transition

Describe the supply of public housing developments

There are several neighborhoods in the City that are nearly entirely composed of public/assisted housing including English Woods, Villages at Roll Hill, and South Cumminsville/Millvale.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan

CMHA has 5,126 public housing units, most of which are located in the City of Cincinnati. These include scattered site single family homes throughout Hamilton County and the following developments:
- High-Rise Buildings: Park Eden, Riverview, Redding, Marquette Manor, The Evanston, Maple Tower, San Marco, The Beechwood, Stanley Rowe Towers, President, and Pinecrest;
- Apartments and Townhomes: Findlater Gardens, Winton Terrace, Millvale, and Sutter View; and
- Multi-Family Homes: Horizon Hills, Washington Terrace, Setty Kuhn, Liberty Apartments, Marianna Terrace, Clinton Springs, and Beacon Glen.

In 2019, there were 7,443 families on CMHA's wait list for Section 8 tenant-based assistance. Of the families on the wait list, 99.3% are at extremely low-income levels, 53% are families with children, and 14.5% are families with disabilities. Also, there were currently 13,035 families on the wait list for public housing. Of the families on the wait list for public housing, 86.5% are extremely low-income, 37% are families with children, and 8.6% are families with disabilities.

Public Housing Condition

Public Housing Development	Average Inspection Score
Information not available	Information not available

Table 39 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction

With almost 5,300 public housing units, Cincinnati Metropolitan Housing Authority units are maintained. CMHA conducts regular inspections of all units. CMHA has a 24-hour maintenance customer service line and responds to emergencies as needed.

CMHA has consistently planned for modernization to its units in accordance with the approved Public Housing Agency Plan. CMHA conducts evaluations of the physical needs of its portfolio of Asset Management properties to ensure that it can maintain or expand the supply of affordable housing in an efficient manner. Physically non-viable properties, including properties that are too expensive to maintain or rehabilitate, are expected to be replaced from the housing portfolio in the next few years.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing

CMHA has the following plans for improving the environment of low- and moderate-income families residing in public housing:
- Assess Asset Management units for long term viability;
- Continue to develop additional affordable units for families, seniors, and special population through multiple funding sources for rental and homeownership;
- Build an alliance with advocates for affordable housing to preserve, maintain and develop quality affordable housing; and
- Continue to work toward achieving 5% mobility accessibility and 2% sensory accessibility within the Asset Management portfolio.

Discussion

CMHA has identified the following goals relating to modernizing its Asset Management housing units and improving the living environment of families:

- Continue to develop affordable housing within Hamilton County employing mixed finance approach where appropriate in partnership with communities;
- Continue to improve CMHA's community visibility image and build stronger relationships within the community by utilizing outreach and education methods;
- Create and implement new business development plan to generate additional revenue to support and assist CMHA's mission and business goals;
- Update and create new agency wide policies and standard operating procedures to manage and mitigate risk to the agency;
- Continue to assess and create new instrumentalities as needed for development and diverse revenue streams; and
- Continue to further Fair Housing initiatives.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The City of Cincinnati and Hamilton County work through the Cincinnati/Hamilton County Continuum of Care for the Homeless (OH-500) to meet the needs of people experiencing homelessness, in partnership with the organizations listed below:

Bethany House Services
Caracole, Inc.
Center for Independent Living Options
Center for Respite Care
Cincinnati Health Network
Cincinnati Center City Development Corporation
Cincinnati Metropolitan Housing Authority
Cincinnati Union Bethel
City Gospel Mission
City of Cincinnati
Excel Development Corporation
Freestore Foodbank
Greater Cincinnati Behavioral Health Services
Greater Cincinnati Homeless Coalition
Hamilton County
Hamilton County Job and Family Services
Interfaith Hospitality Network of Greater Cincinnati
Jewish Family Services
Joseph House
Lighthouse Youth and Family Services
Maslow's Army
National Church Residences
Northern Kentucky Health Department
Nothing Into Something Real Estate
Ohio Valley Goodwill Industries
Over-the-Rhine Community Housing
Prince of Peace Lutheran Church
Salvation Army
Santa Maria Community Services
Shelterhouse Volunteer Group
Society of St. Vincent de Paul

St. Francis / St. Joseph Catholic Worker House

Talbert House

Tender Mercies

Veterans Administration

Volunteers of America

YWCA of Greater Cincinnati

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds*	
	Year-Round Beds (Current and New)	Voucher / Seasonal / Overflow Beds	Current and New	Current and New	Under Development
Households with Adult(s) and Child(ren)	603	100	348	3,096	139
Households with Only Adults	555	100	38	539	139
Chronically Homeless Households	0	0	0	546	80
Veterans	12	0	170	178	35
Unaccompanied Youth	48	0	0	104	0

Table 40 - Facilities and Housing Targeted to Homeless Households

Permanent Housing (PH) includes both Permanent Supportive Housing and Rapid Re-housing programs, as indicated in HUD CoC Interim rule. Data source: OH-500 Continuum of Care Housing Inventory Chart, HUD Homeless Data Exchange (HDX) system

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Health care services for the homeless: The Cincinnati Health Network (CHN), which administers Health Care for the Homeless programming and funding, is a key partner within the Cincinnati/Hamilton County Continuum of Care for the Homeless. CHN is a system of health care and supportive service providers that create a seamless continuum of care for people experiencing homelessness in Greater Cincinnati and Northern Kentucky. CHN offers a comprehensive program of primary medical and mental health services, substance abuse addictions treatment, respite care, and referrals to dental and other health services. CHN, through the Health Care for the Homeless Program, partners with experienced organizations and community providers to address the gaps in service delivery and improve the overall health status of those experiencing homelessness. As the only Federally Qualified Health Center in this area dedicated exclusively to meeting the complex health care needs of homeless individuals and families and recognized as a Patient Centered Medical Home by the National Committee for Quality Assurance (NCQA), CHN plays a critical role in serving over 10,000 patients annually. CHN offers walk-in, same-day, and scheduled appointments; sees patients regardless of their ability to pay; takes Medicaid, Medicare, and other types of insurance and regardless of the patient's housing status, will provide assistance to those seeking health care services.

Mental health services: The local Continuum of Care has multiple key partners that provide extensive mental health services in addition to housing, such as Talbert House and Greater Cincinnati Behavioral Health Services (GCBHS). GCBHS also operates the Projects for Assistance in Transition from Homelessness (PATH) Team, the area's largest street outreach program, which targets its services to non-service-connected people with mental health issues that are sleeping unsheltered.

Local Homeless Management Information System (HMIS) data indicate that over half of the single adults served in emergency shelters in Cincinnati and Hamilton County have at least one disabling condition, about a third suffer from a mental illness, and that about one in four has a chronic health condition. The local system is working to specifically target housing and resources toward those who are chronically homeless, and to improve services and case management to connect this population with needed resources, employment, and housing.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Organization Name	Project Name	Type	Chronically Homeless Beds	Veteran Beds	Youth Beds
Bethany House Services (BHS)	BHS – Family Shelter	ES		0	0
Bethany House Services	BHS – Family Transitions	RRH		0	0
Bethany House Services	BHS – SHP RRH Demo (Level 2)	TH		0	0
Caracole Inc. (CARA)	CARA – Caracole House	TH		0	0
Caracole Inc.	CARA – Recovery Community	TH		0	0
Center for Independent Living Options (CILO)	CILO – Permanent Housing	PSH	12	0	0
Center for Independent Living Options	CILO – Permanent Housing 2	PSH	22	0	0
Center for Respite Care (CRC)	CRC – Center for Respite Care	ES		0	0
Center for Respite Care	CRC – Permanent Housing and Expansion Consolidation	RRH		0	0
Cincinnati Union Bethel (CUB)	CUB – Off the Streets Residential	ES		0	0
City Ministries (CM)	CM – City Gospel Mission	ES		0	0
City Ministries	CM – Exodus	TH		0	0
City Ministries	CM – Magnolia	PSH		0	0
City of Cincinnati	SPC – TAL – Shelter Plus Care	PSH	104	0	0
City of Cincinnati	SPC – CARA – Shelter Plus Care	PSH	11	0	0
City of Cincinnati	SPC 2009 – OTRCH (P2R – BONUS) (CH)	PSH	25	0	0
City of Cincinnati	SPC 2009 – OTRCH (P2R – PRN) (CH)	PSH	10	0	0

Organization Name	Project Name	Type	Chronically Homeless Beds	Veteran Beds	Youth Beds
City of Cincinnati	SPC OTRCH – Shelter Plus Care	PSH	59	0	0
City of Cincinnati	SPC – EX-Shelter Plus Care	PSH	185	0	0
City of Cincinnati	SPC – Anna Louise Inn (Bonus) (CUB/OTRCH – Kerper)	PSH		0	0
City of Cincinnati	SPC – Anna Louise Inn PRN (TAL – Grand/Victory Parkway)	PSH		0	0
City of Cincinnati	SPC – SRA – Tender Mercies: Dana Hotel	PSH	15	0	0
City of Cincinnati	SPC – SRA OTRCH: Jimmy Heath (SHP – ODEON)	PSH	25	0	0
City of Cincinnati	SPC – SRA Tender Mercies: Harkavy Hall	PSH	6	0	0
City of Cincinnati	SPC – SRO OTRCH: Recovery Hotel	PSH	12	0	0
Cincinnati Metropolitan Housing Authority – VA	HUD – VASH	PSH	0	143	0
Drop Inn Center (DIC)	DIC – Cold Shelter	ES			
Drop Inn Center	DIC – Men's Entry Shelter	ES		0	0
Drop Inn Center	DIC – Men's Safe Shelter	ES		0	0
Drop Inn Center	DIC – Men's Step Up Shelter	ES		0	0
Drop Inn Center	DIC – State-Funded RRH	RRH		0	0
Drop Inn Center	DIC – Transitional 6	TH		0	0
Drop Inn Center	DIC – Transitional Housing	TH		0	0
Drop Inn Center	DIC – Women's Shelter	ES		0	0

Organization Name	Project Name	Type	Chronically Homeless Beds	Veteran Beds	Youth Beds
Drop Inn Center	GPD – DIC – Men's Step Up Shelter	TH		15	0
Freestore Foodbank (FSFB)	FSFB – Transitional Housing PSH	PSH	10	0	0
Freestore Foodbank	FSFB – Rapid Re-housing	RRH		0	0
Freestore Foodbank	FSFB – Scattered Site Permanent Housing	PSH	10	0	0
Grace Place Catholic Worker House (GP)	GP – Grace Place	TH		0	0
Interfaith Hospitality Network (IHN)	IHN – Family Shelter	ES		0	0
Interfaith Hospitality Network	IHN – Transitional Housing	PSH	30	0	0
Joseph House (JH)	GPD – JH – Joseph House HUD and Per Diem	TH		63	0
Lighthouse Youth Services (LYS)	LYS Expansion	RRH		0	23
Lighthouse Youth Services	LYS – DHHS Scattered Sites	RRH		0	7
Lighthouse Youth Services	LYS – HUD Scattered Sites	RRH		0	27
Lighthouse Youth Services	LYS – Lighthouse on Highland	ES		0	28
Lighthouse Youth Services	LYS – Permanent Supportive Housing	PSH		0	34
Lighthouse Youth Services	LYS – State-funded RRH	RRH		0	13
Lighthouse Youth Services	LYS – Youth Crisis Center	ES		0	20
Mercy Franciscan at St. John's (MFSJ)	MFSJ – Temporary Housing Family Shelter	ES		0	0

Organization Name	Project Name	Type	Chronically Homeless Beds	Veteran Beds	Youth Beds
Mercy Franciscan at St. John's	MFSJ – ALI/Geiger, Josephine	ES		0	0
MHAP – MHRSB	MHAP – Quick Access	ES		0	0
Nothing into Something Real Estate	The Exit PSH program	PSH		0	0
Ohio Valley Goodwill (OVGI)	GPD – OVGI – Dormitory	TH		24	0
Ohio Valley Goodwill	OVGI – Leasing Pool 1 and 2 Consolidation	RRH		0	0
Ohio Valley Goodwill	OVGI – Permanent Housing I and III Consolidation	RRH		0	0
Ohio Valley Goodwill	SSVF – OVGI	RRH		28	0
Over-the-Rhine Community Housing (OTRCH)	OTRCH – Buddy's Place	PSH	0	0	0
Over-the-Rhine Community Housing	OTRCH – Sharp Village	PSH	0	0	0
Over-the-Rhine Community Housing	OTRCH – Spring Street	PSH	0	0	0
Prospect House Inc. (PHI)	PHI – Prospect House Homeless Housing	TH		0	0
Salvation Army (SA)	SA – Cincinnati Rapid Re-Housing	RRH		0	0
Salvation Army	SA – Family Shelter	ES		0	0
Salvation Army	SA – Permanent Housing	RRH		0	0
St. Francis / St. Joseph Catholic Worker House (SFSJ)	SFSJ – Catholic Worker House	ES		0	0
Talbert House (TAL)	GPD – TAL – Parkway Center	TH		18	0
Talbert House	HCHV/EH – TAL – HCHV Emergency Shelter	ES		6	0

Organization Name	Project Name	Type	Chronically Homeless Beds	Veteran Beds	Youth Beds
Talbert House	HCHV/EH – TAL – HCHV Emergency Shelter	ES		6	0
Talbert House	SSVF – Talbert House SSVF	RRH		7	0
Talbert House	TAL – Parkway Center	TH		0	0
Talbert House	TAL – TAPP	RRH		0	0
Tender Mercies (TM)	TM – non-HUD funded Permanent Housing II	PSH	0	0	0
Tender Mercies	TM – Permanent Housing	PSH	10	0	0
Tender Mercies	TM – Transitional Housing	TH		0	0
Tom Geiger Guest House (TGGH)	Gertrude (TLP3)	TH		0	0
Tom Geiger Guest House	TGGH – Bokenkotter Permanent Housing	PSH	0	0	0
Volunteers of America (VOA)	VOA – Transitional Housing – GPD	TH		50	0
YWCA	YWCA Transitional Housing	RRH		0	0
YWCA	YWCA Women's TH – scattered site	RRH		0	0
YWCA	YWCA – Battered Women's Shelter	ES		0	0
YWCA	YWCA – TLP1	TH		0	0
Total			**546**	**360**	**152**

ES: Emergency Shelter

RRH: Rapid Re-Housing

TH: Transitional Housing

PSH: Permanent Supportive Housing

SHP: Supportive Housing Program

SPC: Shelter Plus Care

VA: Veteran's Affair

VASH: Veteran's Affair Supportive Housing

SRA: Sponsor-based Rental Assistance

SRO: Single Room Occupancy

GPD: Grant and Per Diem

DHHS: Department of Health and Human Services

PRN: Pro Rata Need

ALI: Anna Louis Inn

SSVF: Supportive Services for Veteran Families

MHAP: Mental Health Access Point

MHRSB: Mental Health Recover Services Board

P2R: Path To Recovery

HCHV: Health Care for Homeless Veterans

EH: Emergency Housing

TLP: Transitional Living Program

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

The City of Cincinnati works with Hamilton County, nonprofit organizations and the State of Ohio to address special needs facilities and services.

HOPWA Assistance Baseline Table

Type of HOPWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	61
PH in facilities	0
STRMU	106
ST or TH facilities	23
PH placement	0

Table 41– HOPWA Assistance Baseline

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Supportive housing needs are addressed through the programs listed below:

- HOME funds are used by the City of Cincinnati and Hamilton County to support the development and preservation of affordable housing.
- ESG funds are used to operate homeless shelters, as well as to provide Rapid Re-housing with case management services.
- HOPWA funds are used for supportive services programs at Caracole, Shelterhouse, the Center for Respite Care and Northern Kentucky Health Independent District.
- The City consistently uses 15% of CDBG entitlement funds for public services including fair housing, tenant representation, emergency mortgage assistance, and job training programs.
- Human services funding allocated through United Way of Greater Cincinnati. Currently, funding is provided in six key areas: 1) Reducing homelessness, 2) Comprehensive Workforce Development support, 3) Emergency Wrap Around Services, 4) Addiction Prevention, 5) Violence Prevention, and 6) Senior Services.

- Programs for those residents suffering from alcohol and/or drug addictions are provided by nonprofit partners including the Center for Chemical Addictions Treatment (CCAT), the Hamilton County Mental Health and Recovery Services Board, Alcoholism Council of the Cincinnati Area, Talbert House, and Joseph House.
- Supportive housing is provided through the HUD Continuum of Care for the Homeless and the following agencies participate in this program:
  - Bethany House Services
  - Caracole Inc.
  - Center for Independent Living Options
  - HUD/VASH program through the Cincinnati Metropolitan Housing Authority and the VA
  - Excel Development
  - Interfaith Hospitality Network of Greater Cincinnati
  - Lighthouse Youth and Family Services
  - Nothing into Something Real Estate
  - Ohio Valley Goodwill Industries
  - Over-the-Rhine Community Housing
  - Talbert House
  - Tender Mercies

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The City does not have separate programs to ensure that people returning from mental and physical health institutions receive appropriate supportive housing. However, all services and programs listed above are available to these persons.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

One-year goals for supportive housing needs are addressed through the programs listed below:

- ESG funds may support approximately 5 different emergency shelter operators, allowing the shelter system to serve at least 6,000 people per year;
- HOPWA funds may assist about 400 persons per year;
- CDBG funds for public services may assist approximately 2,000 persons per year;
- Human services funding should assist 20,000 persons per year;
- Shelter Diversion services may serve approximately 1,000 people per year; and
- HUD and VA funded Transitional Housing programs may serve approximately 600 per year.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City of Cincinnati Department of Community and Economic Development and Hamilton County Department of Community Development worked collaboratively on the 2019 Fair Housing Assessment for Cincinnati and Hamilton County for the 2020 – 2024 Consolidated Plan. The 20196 Fair Housing Assessment for Cincinnati and Hamilton County report provides an overview of the impediments of fair housing in the area. Federal law prohibits housing discrimination based on race, color, national origin, religion, sex, disability, or family status. Military and ancestry status are protected classes in the State of Ohio. In the City of Cincinnati, protected classes also include marital status, Appalachian origin, sexual orientation, and transgender status.

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

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

MA-45 Non-Housing Community Development Assets – 91.215 (f)
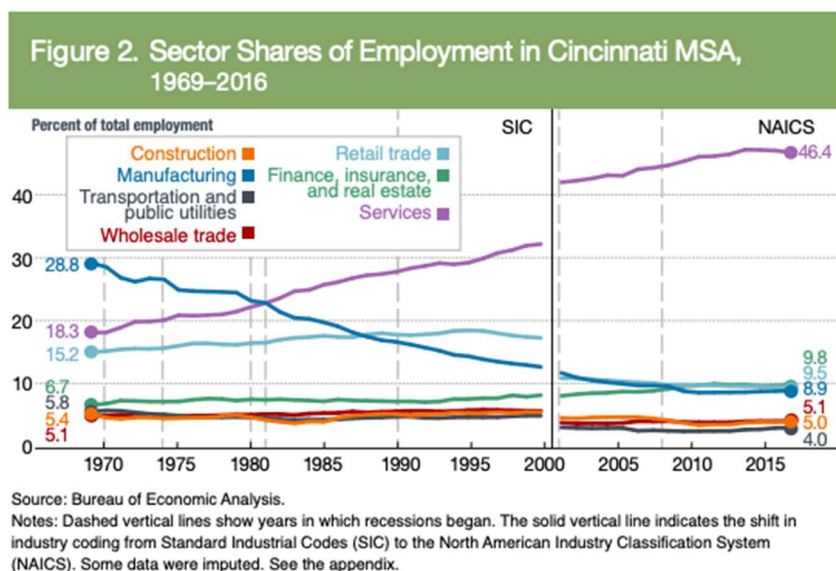
Introduction

At the beginning of 2020, approximately ten years of economic recovery since the 2008 Recession had left the Cincinnati's metropolitan statistical area (MSA) economy in a similar position in comparison to Cincinnati's peer metro regions, the rest of Ohio, and the nation as a whole. The Federal Reserve Bank of Cleveland's August 2019 report *Fourth District Metro Mix: Cincinnati* showed remarkably consistent moderate growth of jobs, real gross domestic product (GDP), and real per capita income in the region on a year-over-year basis for the last several years. As of April 2019, the City's historically low 3.6% unemployment rate was about the same as the United States as a whole, and well below the Ohio rate of 4.2%. Since the end of the 2008 Recession, real per capita income in the region has risen fairly consistently at an annual average rate of 1.9%, outpacing both Ohio and the U.S. during the same time period.

Despite the relatively healthy status of the local and national economy as of the close of 2019, the sudden emergence of the Coronavirus Disease 2019 (COVID-19) epidemic has, at best, clouded the economic picture and created great uncertainty going forward as Cincinnati embarks on its next 5-year Consolidated Plan. The World Health Organization declared a pandemic in mid-March 2020, and 2 weeks thereafter the U.S. passed China to lead all countries in the number of positive COVID-19 diagnoses. With much of the U.S. population under stay-at-home orders or something similar and expected to remain under such orders for perhaps as long as 2 – 3 months or more, and with many non-essential businesses closed, unemployment claims were already spiking at historic levels even before the close of March. Economists anticipated that small businesses would be particularly devasted in the months to come, especially in heavily disrupted sectors such as restaurants, hospitality, and tourism. The slowdown was forecast to also strongly impact many other industries and lead to millions of layoffs. As of late March 2020, both the Federal Reserve and Moody's Analytics were forecasting a global recession as well as a US recession, despite major fiscal stimulus efforts including a $2 trillion stimulus bill passed by Congress on March 27, 2020.
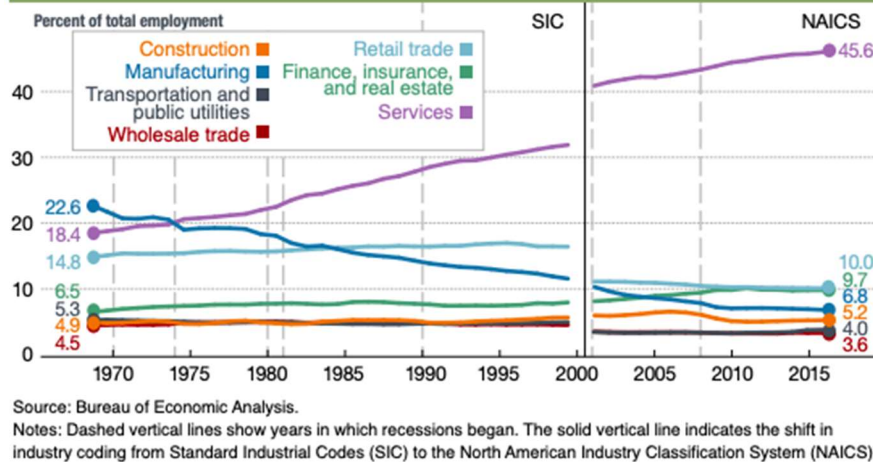
Economic projections, reflecting an evolving understanding of the pandemic, were extremely fluid as of March 2020, however it is safe to assume that 2020 and 2021 will not be similar to past years. Like the nation as a whole, the Cincinnati area is witnessing an abrupt end to a decade of consistent, moderate economic growth, high economic stability, and tight employment markets. The City anticipates major economic disruption and joblessness to impact businesses, employees, and residents. As recessions historically tend to hit minority and low-income communities even harder than the population as a whole, the city of Cincinnati with its higher concentration of poverty can expect disproportionately higher unemployment rates, eviction

rates, and other indicators of severe economic distress for an unknown period of time. The unknowns make it challenging to plan for the next 5 years of economic needs in Cincinnati, however, there is an assumption that a recovery will make significant strides over the next 5 years and that the local economy will require similar interventions as before in areas such as business incentives and financing, small business and entrepreneurship, neighborhood revitalization, economic inclusion, industrial redevelopment, and workforce development. During the immediate recovery period, additional short-term measures may be warranted such as special emergency support for small businesses.

The Cincinnati region's economic diversity bodes well for its eventual recovery and a stable long-term outlook. As the Federal Reserve's 2018 article *Rust and Renewal: A Cincinnati Retrospective* points out, while Cincinnati was historically a very manufacturing-dependent metro area and while it "remains a manufacturing-intensive region relative to the nation, it is now solidly a modern service-oriented metropolitan area led by business-management, financial, and accounting activities." As the below side-by-side charts reproduced from the same article show with data from the Bureau of Economic Analysis, the Cincinnati area closely mirrors the U.S. as a whole, both in its long-term industrial decline, and also in its successful transition from a manufacturing-dependent economy to a diverse, service-based economy. Cincinnati features a strong and mature manufacturing sector representing several specialties, but also newer areas of strength such as financial services, consumer products and services, business management, insurance, and logistics.

Figure 2. Sector Shares of Employment in Cincinnati MSA, 1969–2016

Source: Bureau of Economic Analysis.
Notes: Dashed vertical lines show years in which recessions began. The solid vertical line indicates the shift in industry coding from Standard Industrial Codes (SIC) to the North American Industry Classification System (NAICS). Some data were imputed. See the appendix.

Figure 3. Sector Shares of Employment in US, 1969–2016

Percent of total employment

Legend:
- Construction (orange)
- Manufacturing (blue)
- Transportation and public utilities (black)
- Wholesale trade (dark red)
- Retail trade (light blue)
- Finance, insurance, and real estate (green)
- Services (purple)

SIC section starting values (1969):
- 22.6 (Manufacturing)
- 18.4 (Services)
- 14.8 (Retail trade)
- 6.5 (Finance, insurance, and real estate)
- 5.3 (Transportation and public utilities)
- 4.9 (Construction)
- 4.5 (Wholesale trade)

NAICS section ending values (2016):
- 45.6 (Services)
- 10.0
- 9.7
- 6.8
- 5.2
- 4.0
- 3.6

Years shown: 1970, 1975, 1980, 1985, 1990, 1995, 2000, 2005, 2010, 2015

Source: Bureau of Economic Analysis.
Notes: Dashed vertical lines show years in which recessions began. The solid vertical line indicates the shift in industry coding from Standard Industrial Codes (SIC) to the North American Industry Classification System (NAICS).

Within the City of Cincinnati, the past decade of growth has given rise to several trends that should make the urban core and the city's neighborhoods more resilient than before as places where residents, businesses, and employees want to locate. Many of the city's core urban neighborhoods as well as outlying former streetcar suburbs have become stabilized and resurgent as a result of strategic public and private investments in key business districts and in the surrounding housing stock. Significantly, those neighborhoods include not only Downtown and Uptown, which are discussed below, but also populous residential neighborhoods such as Westwood, Northside, College Hill, Walnut Hills, and Madisonville, all of which struggled in the runup to the 2008 Recession. Across parts of the City a previous glut of vacant homes has been renovated or demolished, and many underutilized storefronts have been repopulated with small neighborhood businesses. Due to the very old age of the City's commercial building stock and a change in how residents acquire retail goods, the process of revitalization and renovation must continue in other parts of the City where many other buildings are either extremely dilapidated or uninhabitable.

Like all similar sized metropolitan cities, Cincinnati is greatly challenged by the difficulty of maintaining affordability for low-income residents who are at an elevated risk of being displaced by higher rents as an area becomes desirable to more people. This statement applies to Cincinnati even though it is one of the lowest-cost cities in which to live, and even though many revitalized neighborhoods in Cincinnati are still considered affordable to a moderate-income household. This market phenomenon can often mean displacement to a less convenient location with less access to jobs and transportation. The City recognizes that this ongoing national and local challenge carries repercussions for economic development and workforce, and not just affordable housing, and it is addressed in portions of this Consolidated Plan.

The two largest job centers in the city, Downtown and Uptown (collectively the neighborhoods of Clifton, CUF, University Heights), have been stabilized and even strengthened after previous disinvestment in those neighborhoods. Uptown, a major employment center which contains several major medical complexes and universities, has seen major revitalization in several key respects. The once-blighted Corryville and Clifton Heights communities that serve the university students and employees have seen the addition of numerous new apartments, hotels, and revitalized commercial business districts. Major health systems located in these neighborhoods have invested hundreds of millions of private dollars in new medical facilities and added thousands of new jobs. Most recently and most significantly, the Uptown Innovation Corridor is beginning to get underway along Martin Luther King Jr. Drive in Avondale. The Uptown Innovation Corridor is a transformational mixed-use development supporting medical, research, and innovation industries, envisioned to generate over a million square feet of new office space and several thousand jobs once all phases are complete.

Downtown, the region's center of employment, has also seen a resurgence as an area that now remains very active after close of normal business hours. Beyond the revitalization of Over-the-Rhine, there has also been a transformation in Pendleton and in the Central Business District (e.g. The Banks, Hard Rock Casino Cincinnati, several new residential towers and Class C office conversions, numerous new hotels, and a new Kroger Company grocery store). These investments have provided a needed boost to downtown and its major employers in the form of entertainment/dining, residential population, hotels, transportation (Cincinnati Streetcar), civic amenities (e.g. renovated Washington Park and Music Hall), and new housing opportunities for workers. Revitalization continues in expanded areas such as Over-the-Rhine north of Liberty Street, and in the West End near the soccer stadium being constructed for Cincinnati's Major League Soccer franchise. It is hoped that the City's re-populated and economically diversified urban core can counteract other changes in the central business district during this same time period, such as a recent decline in convention business, closure of major legacy retail stores (Macy's, Saks Fifth Avenue, Tiffany and Company), and recent departure of several major office headquarters (Omnicare, Chiquita Brands International, Macy's).

The table below shows the percentage of non-farm employment, private and government employment as a portion of total employment in the U.S., Peer Regions and Cincinnati.

Economic Development Market Analysis

Percentage of non-farm employment, private and government employment as a portion of total employment

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil and Gas Extraction	302	94	0%	0%	-208
Arts, Entertainment, Accommodations	13,978	24,706	9%	11%	10,728
Construction	4,433	7,414	3%	3%	2,981
Education and Health Care Services	40,358	65,561	27%	29%	25,203
Finance, Insurance, and Real Estate	11,093	22,134	7%	10%	11,041
Information	3,946	6,026	3%	3%	2,080
Manufacturing	15,146	16,137	10%	7%	991
Other Services	6,455	6,090	4%	3%	-365
Professional, Scientific, Management Services	19,740	46,154	13%	20%	26,414
Public Administration	4,778	6,568	3%	3%	1,790
Retail Trade	15,511	11,586	10%	5%	-3,925
Transportation and Warehousing	10,713	7,127	7%	3%	-3,586
Wholesale Trade	3,311	7,166	2%	3%	3,855
Total	**149,764**	**226,763**	**100%**	**100%**	**76,999**

Table 42 - Business Activity

Data Source: 2013-2017 ACS (Workers), 2013 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force Statistics – City of Cincinnati U.S. Bureau of Labor Statistics Local Area Unemployment Statistics (yearly averages 2014 – 2018)			
Year	Labor Force	Employment	Unemployment	Unemployment Rate
1990	174,038	164,168	9,870	5.7
1991	174,951	163,211	11,740	6.7
1992	176,532	162,505	14,027	7.9
1993	176,198	162,114	14,084	8.0
1994	174,033	162,324	11,709	6.7
1995	171,875	161,770	10,105	5.9
1996	173,616	163,164	10,452	6.0
1997	173,314	164,116	9,198	5.3
1998	172,366	163,570	8,796	5.1
1999	171,469	162,550	8,919	5.2
2000	160,403	151,827	8,576	5.3
2001	159,431	150,193	9,238	5.8
2002	159,859	147,444	12,415	7.8
2003	156,277	146,717	9,560	6.1
2004	154,784	145,135	9,649	6.2
2005	152,717	143,389	9,328	6.1
2006	163,430	154,478	8,952	5.5
2007	163,022	153,960	9,062	5.6
2008	162,608	152,673	9,935	6.1
2009	160,419	145,607	14,812	9.2
2010	145,267	130,041	15,226	10.5
2011	142,902	129,399	13,503	9.4
2012	141,062	129,962	11,100	7.9
2013	142,252	131,067	11,185	7.9
2014	141,982	133,384	8,598	6.1
2015	141,815	134,740	7,074	5.0
2016	142,965	135,964	7,001	4.9
2017	145,081	138,110	6,971	4.8
2018	145,761	139,192	6,529	4.5

Labor Force

Total Population in the Civilian Labor Force	146,830
Civilian Employed Population 16 years and over	139,867
Unemployment Rate	4.7%
Unemployment Rate for Ages 16-24	13.15%
Unemployment Rate for Ages 25-65	5.5%

Table 43 - Labor Force

Data Source: 2013-2017 ACS (Unemployment rate ages 16-64) and Local Area Unemployment Statistics for January 2020

Occupations by Sector	Number of People
Management, business and financial	59,811
Farming, fisheries and forestry occupations	6,848
Service	29,361
Sales and office	28,850
Construction, extraction, maintenance and repair	4,559
Production, transportation and material moving	19,230

Table 44 – Occupations by Sector

Data Source: 2013-2017 ACS

Travel Time

Travel Time	Number	Percentage
< 10 Minutes	N/A	11.2%
10-14 Minutes	N/A	14.4%
15-19 Minutes	N/A	19.5%
20-24 Minutes	N/A	19.0%
25-29 Minutes	N/A	8.4%
30-34 Minutes	N/A	14.4%
35-44 Minutes	N/A	4.6%
45-59 Minutes	N/A	4.1%
60 or More Minutes	N/A	4.5%
Total	N/A	

Travel Time	Number	Percentage
< 30 Minutes	N/A	71.6%
30 – 59 Minutes	N/A	23.7%
60 or More Minutes	N/A	4.7%
Total	N/A	

Table 45 – Travel Time

Data Source: 2013-2017 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	7,205	1,942	8,146
High school graduate (includes equivalency)	23,309	3,170	11,512
Some college or Associate's degree	30,699	2,884	9,857
Bachelor's degree or higher	51,387	1,243	6,738

Table 46 - Educational Attainment by Employment Status
Data Source: 2013-2017 ACS

Educational Attainment by Age

	Age					
	18–24 yrs.	25+ yrs.	25-34 yrs.	35–44 yrs.	45–65 yrs.	65+ yrs.
Less than 9th grade	--	6,138				
9th to 12th grade, no diploma	4,332	18,046				
High school graduate, GED, or alternative	12,564	47,978				
Some college, no degree	17,037	52,219				
Associate's degree	--	14,036				
Bachelor's degree	6,075	40,716				
Graduate or professional degree	--	29,587				
High school graduate or higher			50,195 (91.5%)	29,751 (87.7%)	59,025 (86.4%)	28,446 (79.7%)
Bachelor's degree or higher			23,839 (43.4%)	12,558 (37.0%)	19,976 (29.2%)	10,390 (29.1%)

Table 47 - Educational Attainment by Age
Data Source: 2013-2017 ACS

Educational Attainment – Median Earnings in the Past 12 Months (Population 25+ yrs.)

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	$18,207
High school graduate (includes equivalency)	$26,895

Educational Attainment	Median Earnings in the Past 12 Months
Some college or Associate's degree	$31,946
Bachelor's degree	$49,948
Graduate or professional degree	$61,011

Table 48 – Median Earnings in the Past 12 Months

Data Source: 2013-2017 ACS

City of Cincinnati Inflow/Outflow of Jobs

City of Cincinnati Labor Market	Count	% of Total
Employed in the City	185,954	100%
Living in the City	111,468	60%
Net Job Inflow/Outflow	74,486	-

In City Labor Force Efficiency	Count	% of Total
Living in the City	111,468	100%
Living AND Employed in the City	42,462	38.1%
Living in the City but Employed Outside the City	69,006	61.9%

In City Employment Efficiency	Count	% of Total
Employed in the City	186,954	100%
Employed In AND Living In the City	42,462	22.7%
Employed In the City but Living Outside the City	144,492	77.3%

Source: US Census Bureau, OnTheMap Application, http://lehdmap.ces.census.gov

Employees By Age	Count	% of Total
Workers Aged 29 or Younger	50,110	22.1%
Workers Aged 30 to 54	125,543	55.4%
Workers Aged 55 or Older	51,100	22.5%
Total	226,753	100%

Jobs By Type	Count	% of Total
Goods Producing Industry	23,645	10%
Trade, Transportation and Utilities Industry	25,869	12%
All Other Services	177,239	78%
Total	226,753	100%

Source: US Census Bureau, OnTheMap Application, http://lehdmap.ces.census.gov

Based on the Business Activity table above, what are the major employment sectors within this jurisdiction?

Data from the Table 42 – Business Activity table indicates there are four major employment sectors in the jurisdiction, judging by the number of jobs provided within city limits. The largest business sectors include Education and Health Care Services; Professional, Scientific, and Management Services and Administrative and Waste Management Services; Arts, Entertainment, and Accommodation and Food Services; and Finance, Insurance, and Real Estate.

Also note that some sectors have more jobs in the City than there are workers in that industry, while in others there are more workers than there are jobs in the City. This is because workers in the lower-wage sectors (e.g., Transportation and Warehousing) tend to commute out of the City, while in higher-wage sectors such as Finance, Insurance, and Real Estate, there are more jobs than resident workers, indicating that workers in this sector commute into Cincinnati from the suburbs. Therefore, Cincinnati has a high concentration of low-income residents that commute out for work, and a high concentration of high-wage jobs filled by non-residents.

Describe the workforce and infrastructure needs of the business community:

The long-term health and vibrancy of the Cincinnati economy depends on there being underlying conditions under which businesses can become established, thrive, and create quality jobs for residents of the city and region. Some of those conditions have improved in recent years, particularly the stronger sense of place, cleanliness, safety, and amenity in the City's urban core and some outlying neighborhoods, better supporting Cincinnati's attractiveness to businesses, employees, and residents alike. Other kinds of underlying conditions remain serious challenges for the region, especially in infrastructure and workforce development.

Infrastructure needs in Cincinnati are articulated not only by the City of Cincinnati, but also by regional agencies such as the Ohio-Kentucky-Indiana Regional Council of Governments (OKI) and the Southwest Ohio Regional Transit Authority, by local, county and state transportation agencies, and by public and private utilities. The American Society of Civil Engineers currently gives Ohio a D+ infrastructure rating, which corresponds to the national rating of D+. The aging and sprawling existing infrastructure of Ohio is extremely costly to properly maintain, repair, and replace, let alone to build new infrastructure as other needs arise.

Infrastructure needs in the Cincinnati region are headlined by two obsolete major bridges in need of replacement, including the Western Hills Viaduct, a critical connection between the west side and the urban core job centers, as well as the Brent Spence Bridge which carries Interstate-71 and Interstate-75 traffic over the Ohio River, affecting residents and businesses of virtually every

jurisdiction in the region including Cincinnati. There is political and public consensus about both needs, but not on how to provide the funding and whether user fees should be considered.

Another major issue directly affecting economic development is public transportation, considered to be underfunded in Cincinnati compared to other peer Ohio cities. The current vicious cycle of fare increases, service reductions, and ridership declines is not sustainable and represents a critical need due to a local workforce that resides in increasingly far-flung parts of the County and region relative to their jobs. This is a growing need, as recent demographic shifts reveal that poverty is on the rise in many first ring suburbs of Hamilton County that are less walkable and less well served by public transit for residents without personal vehicles. Research shows that low-wage job centers are concentrated in Cincinnati's suburbs, while a majority of the region's low-income workers are concentrated within the City proper. These workers may have limited access to a car and if the workers are consigned to taking public transit, the commute may be long: of workers taking public transportation to work, 73% have a commute time of 30 or more minutes, and 53% have a commute time of 45 minutes or more.

Another example of a serious infrastructure issue in the Cincinnati region that is currently being addressed is the ongoing replacement of the obsolete combined sewer system of Cincinnati. The Metropolitan Sewer District of Greater Cincinnati has been doing expensive, federally mandated projects to eliminate combined sewer overflows at a total cost of well over a billion dollars. Sewer and stormwater rates paid by all property owners in the County have increased accordingly to cover the high capital costs of conforming with a federal consent decree.

Many other infrastructure needs in Cincinnati are not required to be addressed by court order. Each case presents a similarly difficult funding and taxation dilemma for state and local governments that must prioritize among the many infrastructure needs that exist. The City of Cincinnati's most recent bond rating reviews from Standard and Poor's Moody's indicate that the City's finances are considered generally stable and healthy as compared to other municipalities, but that future pension obligations remain a long-term concern despite a recent round of pension system reforms. Despite generally positive bond ratings, the City's annual capital budget is not currently in a position where it is likely to take on dramatic amounts of new infrastructure debt.

When feasible, using CDBG resources, occasional state funding, Tax Increment Financing (TIF), or other special funding mechanisms, the City of Cincinnati has also been regularly addressing case-by-case economic development infrastructure needs on a project or neighborhood level. These include small to medium projects like streetscapes or parking lot improvements for neighborhood business districts, commercial or industrial real estate acquisition and redevelopment for eventual highest-and-best market use, and publicly financed parking structures or street improvements supported by project tax increments. Frequently these types of incentives are provided to support major commercial development within the Downtown and

Uptown urban core and in neighborhood business districts. With the intent of increasing these resources, the City has created a new round of neighborhood TIF districts in 2019. The City also anticipates participation in a new State of Ohio Site Inventory Program that would increase funding to redevelop commercial and industrial property for manufacturing and other forms of job creation.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Several recent investments in Cincinnati reveal the growing alignment of economic and workforce development goals. These investments leverage the private, public, and education sectors to encourage talent development and business growth in "innovation" industries that have higher spillover effects and good long-term growth prospects. The investments may assist emerging industries take off and offer new career opportunities for local residents. In some cases, such as cybersecurity, the development of local career pathways into these industries is already underway.

The Ohio Cyber Range Institute (OCRI) is an example of a unique public investment that would simultaneously qualify as economic development and workforce development. The OCRI provides administration and central coordination for the Ohio Cyber Range platform, a state-wide tool that supports programming for kindergarten to graduate degree courses and events. The City anticipates this investment may attract businesses to the area and generate opportunities for local youth and adults.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The Cincinnati region's economic success depends on the ability to provide a qualified workforce; the workforce's success depends on the ability to acquire skills and access good jobs that pay a living wage.

In reviewing the educational attainment by employment status, it appears that Cincinnati has more skilled people than jobs. This indicates that Cincinnati must grow and attract industries that offer opportunity for skilled workers. Investments such as the Innovation District will assist with this effort. On the other hand, information from employer interviews suggests that middle-skill jobs in industries like manufacturing and construction that are going unfilled and are in high demand. Construction and manufacturing jobs tend to pay high wages than retail or service-oriented jobs for workers that do not have a four-year degree. Connecting lower-skilled workers

to training and employment opportunities to jobs in need and that provide workers a better income is and will continue to be a priority for the City.

Though a national trend of job polarization has also affected the Cincinnati region. Many low-skill, low-wage jobs in the area provide insufficient wages and limited upward mobility to more than a quarter of the regional workforce.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Economic vitality depends on an educated, skilled workforce. An educated and skilled workforce is key to Cincinnati's economy and to its success as a city and a region. The City of Cincinnati collaborates with the Southwest Ohio Region Workforce Investment Board (SWORWIB) to ensure the development of locally driven training and placement programs that offer high-quality education to potential employees and technical assistance to new and established businesses, consistent with specific needs. Developing that workforce and connecting those job seekers to employers is the mission of SWORWIB.

SWORWIB focuses on the following industries:

- Advanced Manufacturing
- Construction
- Healthcare
- Information Technology
- Transportation, Distribution, and Logistics

The City's Consolidated Plan includes goals and strategies related to job training and placement. The City has representatives on the SWORWIB Board and Committees and works with member agencies to coordinate efforts to advance opportunities for all City residents.

The City also administers the Hand Up Initiative which provides job readiness, job training, transitional jobs and job creation to reduce poverty. The program contracts with eight training organizations to provide training in SWORWIB's five industries of focus, as well as the food service industry and green industries.

In order to enhance its workforce development efforts, the City has brought on an AmeriCorps Volunteers In Service To America (VISTA) to research and author a workforce action plan. The plan will provide the City with actionable recommendations for both the short- and long-term. The goal is to reduce poverty and increase economic mobility by growing good jobs, increasing

the accessibility of education, reducing barriers to work, and merging the supply and demand sides of the market to reduce inefficiencies (e.g., in education).

Does this jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

The City of Cincinnati does not participate in its own Comprehensive Economic Development Strategy (CEDS) but is covered under the CEDS submitted to Hamilton County. The City has a representative on the CEDS Committee of Hamilton County and provides input to the strategy's content and implementation.

If so, what economic development initiatives are undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Discussion

Plan Cincinnati is the City-wide comprehensive plan that sets the course for the next several decades in Cincinnati. It was adopted unanimously by the Cincinnati Council in November 2012 and is now the official document guiding future planning and development in the City of Cincinnati. All future Neighborhood, Neighborhood Business District, Urban Renewal, Urban Design, Strategic, Area, or Special Plans must adhere to the goals and strategies set forth in this document. The Plan outlines goals and strategies that impact economic growth in the Compete section of the *Plan Cincinnati* document. All City ordinances, contracts and projects must demonstrate consistency with *Plan Cincinnati* in order to be approved.

In addition to *Plan Cincinnati*, the City of Cincinnati works on a regional basis with the JobsOhio, partner organization for southwest Ohio, and the Regional Economic Development Initiative Cincinnati, to support regional and state economic development strategies. Key industries in southwest Ohio include advanced manufacturing, aerospace, bio-health, food, information technology, and shared services. The importance of these several industry clusters generally holds true for Cincinnati proper as well. Businesses in these sectors are targeted for business retention efforts, new business/new location recruitment, and economic incentives.

MA-50 Needs and Market Analysis Discussion

Issues to take into consideration with prioritizing housing development strategies include the following:
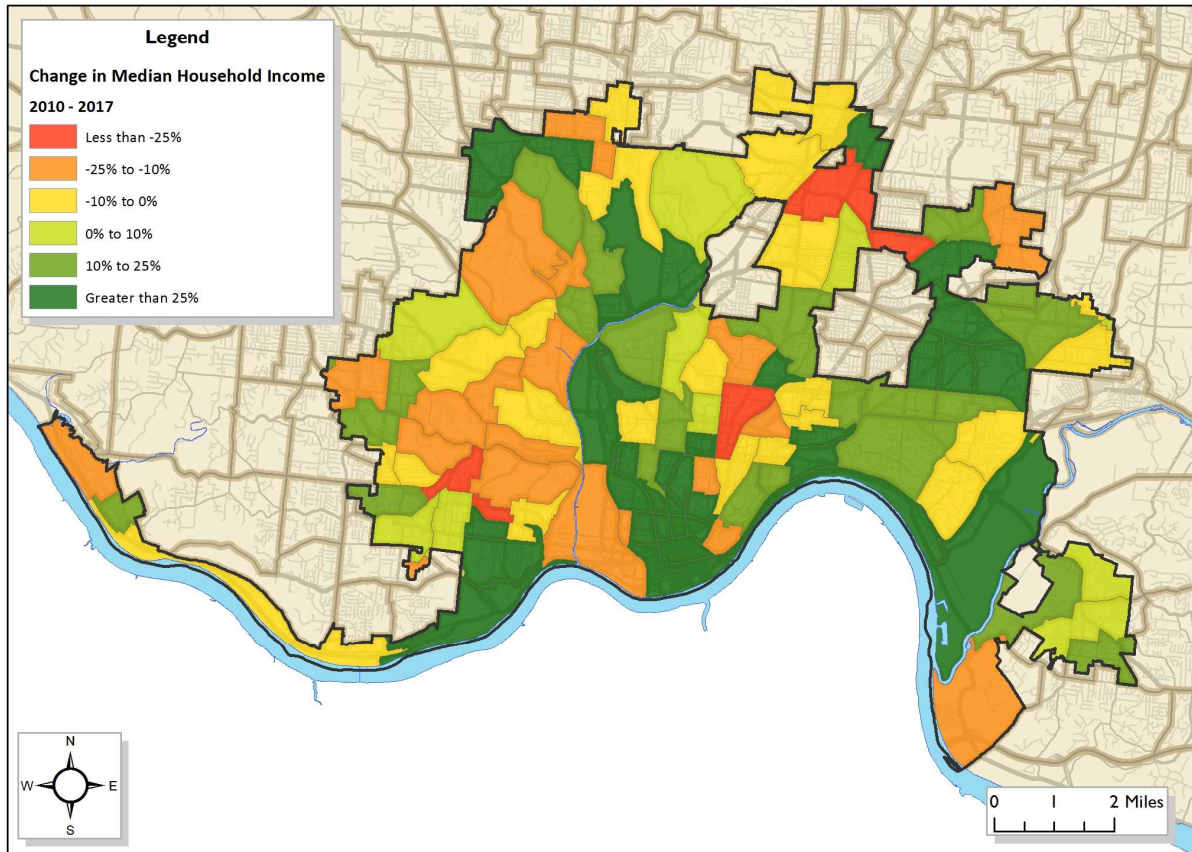
- The primary barrier to affordable housing is stagnant working class and middle-class incomes since mid-1970s; nationwide, wages have not kept up with increases in cost of living, especially in housing construction and health care costs;
- Construction of new low-income housing is not currently economically feasible in Cincinnati without substantial cash subsidy, even when considering available property tax abatements, which may be a function of the imbalance between the cost of building housing, the cost of operating housing, and the ability of low-income households to pay rent to support those costs;
- Strict local zoning and land use requirements in Cincinnati (e.g. density limits, parking requirements) can significantly increase development costs; and
- There are more requests to the Ohio Housing Finance Authority for Low Income Housing Tax Credits than awardees and there is a need for an increase in housing choice vouchers as indicated by CMHA's waiting lists.

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

For the purposes of the Consolidated Plan, "concentration" is defined as census tracts where the percentage of households with multiple housing problems is higher than the average for the City as a whole. Although households with multiple housing problems are not geographically concentrated, these households are concentrated to one income category. Housing is classified as having multiple housing when one or more of the following characteristics apply: lacking complete plumbing facilities; lacking complete kitchen facilities; or housing costs greater than 30% of income and overcrowding is present, meaning more than one person per room.
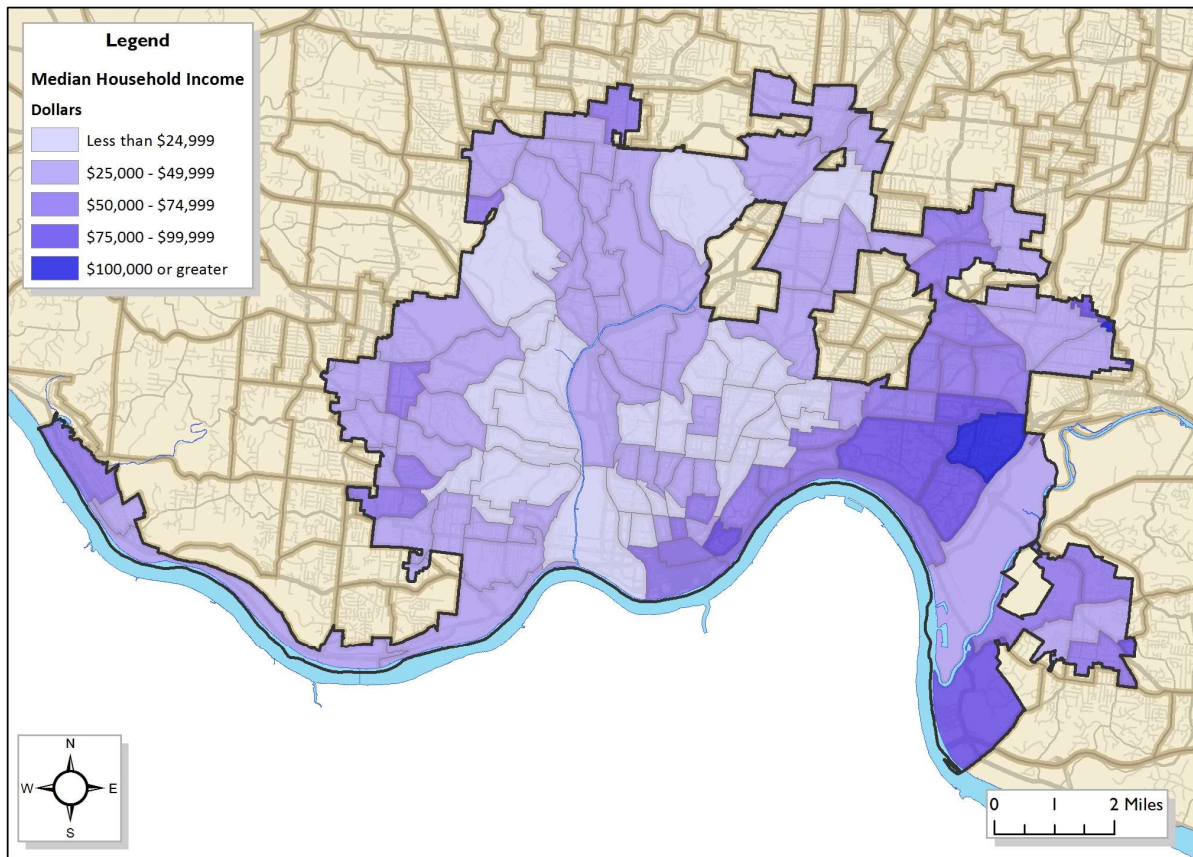
Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

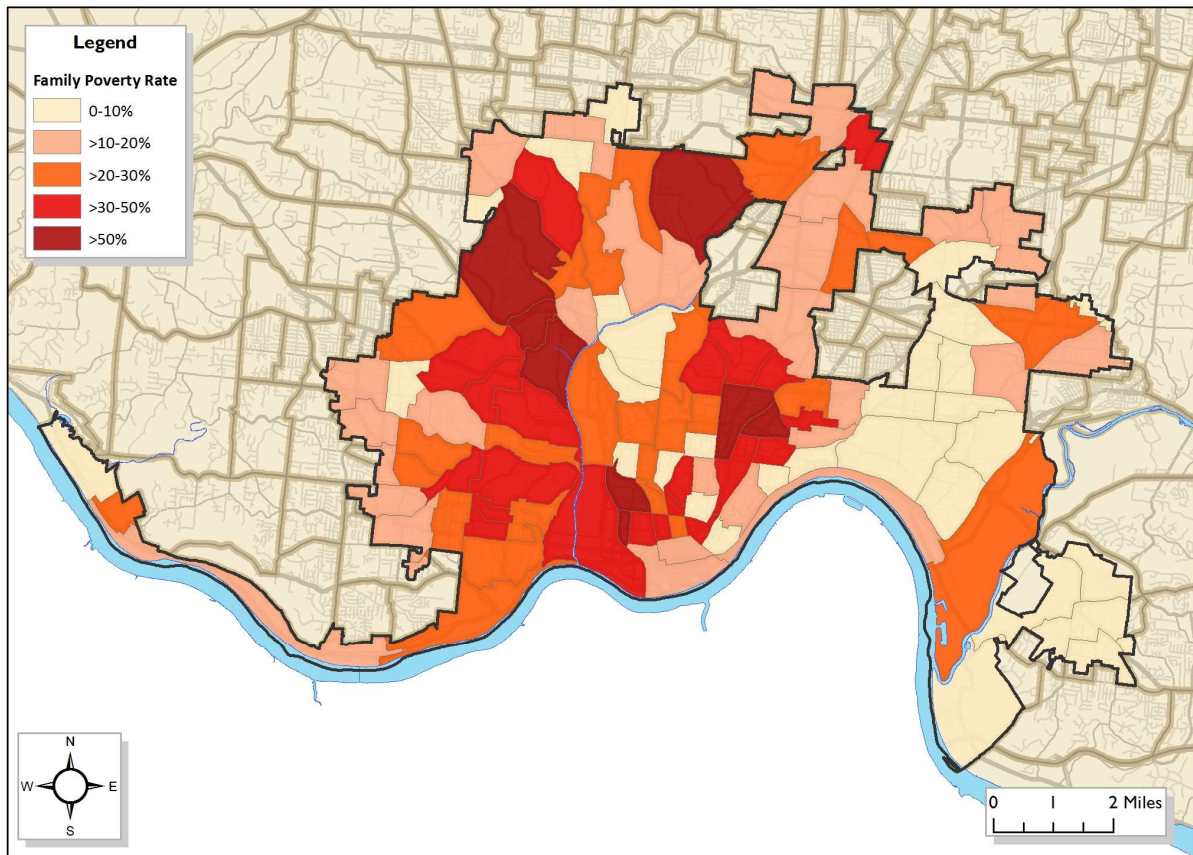**Change in Median Household Income 2010-2017 (ACS)**

There is a concentration of low-income families in the West End, Clifton, CUF, University Heights, (collectively referred to as Uptown Cincinnati), and neighborhoods directly west of the Mill Creek. In these neighborhoods, half of households have incomes below $25,000. The 2020 poverty guideline for a family of four is $26,200. Several of these neighborhoods, such as Avondale, South Cumminsville, and parts of Mt. Airy and the West End also have a family poverty rate above 50%. Concentration of poverty refers to census tracts where the poverty rate is 40% or more.

Median Household Income (2017 ACS)

There is a concentration of the black population in central and west side neighborhoods – Evanston, Avondale, Bond Hill, Roselawn, Kennedy Heights, East Westwood, Villages at Roll Hill, North and South Fairmount, Millvale, northern and eastern Westwood, and Winton Hill which also overlaps with the location of the extremely low-income population and the Family Poverty Rate map.

Family Poverty Rate (2017 ACS)

What are the characteristics of the market in these areas/neighborhoods?

Family poverty, particularly for families with young children, is extremely high throughout Cincinnati, with the exception of the east side. Median household incomes are in steep decline in west side neighborhoods. Several of these neighborhoods, including inner west side neighborhoods, are difficult to serve due to the lack of an established housing market and lack of amenities such as groceries, retail, and restaurants.

Are there any community assets in these areas/neighborhoods?

- Architecturally significant building stock throughout the city, including low-income neighborhoods;
- Parks and recreation centers, community centers, supportive service agencies, community development corporations, civic associations, public libraries, community and technical colleges, universities, and other academic institutions, and medical facilities; and

- Neighborhood business districts with redevelopment potential in West End, Walnut Hills, Price Hills, Westwood, and Mt. Airy.

There are many community assets located throughout the low-income neighborhoods, including:
- Cincinnati Museum Center at Union Terminal, located in West End;
- National Underground Railroad Freedom Center, located CBD (Central Business District);
- Findlay Market, in Over-the-Rhine;
- Harriet Beecher Stowe House, located in Walnut Hills;
- William Howard Taft National Historic Site, located in Mt. Auburn;
- Cincinnati Art Museum, located in Walnut Hills;
- Contemporary Arts Museum, located in CBD;
- Aronoff Center for the Arts, located in CBD;
- Taft Museum of Art, located in CBD;
- Cincinnati Zoo and Botanical Gardens, located in Avondale;
- Cincinnati Playhouse in the Park, located in Walnut Hills;
- American Sign Museum, located in Camp Washington;
- Over-the-Rhine Urban Neighborhood Entertainment District, located in Over-the-Rhine;
- Cincinnati Music Hall, located in Over-the-Rhine;
- Krohn Conservatory, located in Walnut Hills; and
- Fountain Square, located in CBD.

Are there other strategic opportunities in any of these areas?

- The possibility of expanded transit service, including possible Bus Rapid Transit along key route corridors in neighborhoods of Avondale and East and West Price Hill;
- Targeting single-family investments in stimulating a neighborhood housing market, complementing both income-restricted homeownership opportunities and moderately affordable market rate product as a catalyst for additional private investment in the neighborhood; and
- Prioritizing the City's Housing Notice of Funding Availability (NOFA) funding for affordable housing in areas with neighborhood business districts that are evolving or transforming as the business districts may contain vacant properties and lots, but have the potential for redevelopment and infill development of housing with close proximity to amenities.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan portion of the Consolidated Plan is based on the results of the Needs Assessment, Market Analysis, resident survey, public comments, community stakeholder focus group interviews, and review of existing local/regional planning documents. With the limited nature of resources, the City prioritized the needs identified through the Consolidated Planning process to direct the allocation of funds in a manner that maximizes community impact.

Based on the priority needs, the City of Cincinnati developed Strategic Plan Goals designed to address these needs over the 5-year Consolidated Planning period, 2020 through 2024. The Strategic Plan Goals were created with the findings of the Market Analysis, to ensure that the goals were specifically tailored to effectively address local market conditions.

The following sections describe the process of identifying priority needs and developing Strategic Plan Goals in more detail, while emphasizing the influence of local market conditions. In addition, the Strategic Plan outlines how the Strategic Plan Goals coordinate and supplement ongoing efforts related to economic development, affordable housing, homelessness strategies, public services, lead-based paint remediation, and anti-poverty strategies.

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

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

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

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

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

For the CDBG program, the City of Cincinnati will be submitting for HUD approval new Neighborhood Reinvestment Strategy Areas (NRSA) with a new term. An NRSA is a geographical area within a neighborhood that is primarily residential and contains 70% or more of low- and moderate-income residents. NRSA designations assists with targeting CDBG resources in support of community revitalization efforts. The residential portions of the following neighborhoods that will be analyzed for NRSA eligibility are: Avondale; Bond Hill; Camp Washington; Carthage; Corryville; CUF; East End; East Price Hill; East Westwood; English Woods; Evanston; Kennedy Heights; Linwood; Lower Price Hill; Madisonville; Millvale; Mount Airy; Mount Auburn; North Fairmount; Northside; Over-the-Rhine; Pendleton; Riverside; Roselawn; Sedamsville; South Cumminsville; South Fairmount; Spring Grove Village; Villages at Roll Hill; Walnut Hills; West End; West Price Hill; Westwood; and Winton Hills.

Area Name	Area Type*
City-wide	Other
Forthcoming NRSAs (upon HUD approval)	Strategy Area

Table 49 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

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

community.

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

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Priority Need	Description	Associated Goal(s)
Affordable Housing	Production of new units; Rehabilitation of existing units; Acquisition of existing units	Affordable Housing
Homelessness	Outreach; Emergency shelter and transitional housing; Rapid re-housing; Prevention	Homelessness Prevention
Non-Housing Community Development	Public facilities; Public services; Public improvement and infrastructure; Economic Development	Economic Development; Neighborhood Stabilization; Public Services
Non-Homeless Special Needs	Housing Opportunities for Persons With HIV/AIDS residing in the eligible metropolitan statistical area	Special Needs

Table 50 – Priority Needs Summary

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The rental market became less affordable to low-income renters during the past decade. However, available HOME funds are more effectively leveraged on new unit production and rehabilitation.
TBRA for Non-Homeless Special Needs	TBRA is especially critical for non-homeless special needs households due to an overall shortage of Housing Choice Voucher and Project Based Rental Assistance for the special needs' population. ESG and HOPWA funds are targeted to serve this need.
New Unit Production	New unit production has not kept pace with the rapidly growing need for affordable rental housing. LIHTC credits and HOME funds are utilized for new unit production, however, those resources tend to be limited and oversubscribed in Ohio.
Rehabilitation	Unit production of affordable renovations has not kept pace with the rapidly growing need for affordable rental housing. LIHTC credits and HOME funds are utilized for this purpose, however, those resources tend to be limited and oversubscribed in Ohio.
Acquisition, including preservation	The City of Cincinnati generally does not utilize federal resources for acquisition of affordable housing units. Instead, the City focuses the federal resources on hard construction and/or renovation costs for affordable housing.

Table 51 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Expected Amount Available Year 1 – 2020				Narrative Description
	Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $	
CDBG	$11,697,236	$58,733	$16,373,732	$28,129,701	Acquisition Administration Economic Development Housing Public Improvements Public Services
HOME	$2,816,967	$222,102	$6,176,804	$9,215,873	Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership Administration
HOPWA	$1,141,164	$2,269	$625,340	$1,768,773	Permanent housing in facilities Permanent housing placement STRMU Short term or transitional housing facilities Supportive services TBRA
ESG	$1,013,616	$0	$374,762	$1,388,378	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing

Table 52 - Anticipated Resources

The City of Cincinnati's 2020 Entitlement Awards and current program income amounts are listed above. HOME Investment Partnerships Program budgets 2020 allocation with 2019 program income to determine the total project amount available. CDBG budgets with 2020 entitlement allocation and the program income received to date during calendar year 2020. At the end of the calendar year, CDBG will be reconciled with the remaining 2020 program income received to

carry projects and activities through the first part of the next calendar year to avoid a disruption of services provided.

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

CDBG funds are used to leverage other public and private funds. The programs which leverage funds are the Neighborhood Business District Improvement Program (NBDIP); Strategic Housing Initiatives Program; Operating Support for Community Development Corporations (CDCs); Small Business Services; Commercial and Industrial Redevelopment; Historic Stabilization of Structures; Green Urban Watershed Restoration; Findlay Market Operating Support; and Vacant Lot Reutilization. Construction projects are funded as gap financing and are not the only source of funding for these projects.

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

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

The City of Cincinnati owns vacant buildings and vacant lots in most of its fifty-two neighborhoods. Programs in the 2020 – 2024 Consolidated Plan to address the use of publicly owned land – Strategic Housing Initiatives Program and the Vacant Lot Reutilization Program. The City has compiled an inventory on the City owned parcels and properties. The available properties are posted on the City's website, www.choosecincy.com, with an interactive map and property descriptions. Redevelopment projects will be selected using a competitive process under a Notice Of Funding Availability application.

Discussion

The City of Cincinnati operates a program titled Cincinnati Land Reutilization Program (CLRP) to address non-productive publicly owned land or property. The purpose of the CLRP is to return the non-productive property into productive uses, including homeownership, multi-income

housing development, commercial and industrial redevelopment, parks and recreation, institutional or public use, infrastructure, community gardens, urban agriculture, and side-lot, vacant lot purchase. This program utilizes City funds and these properties may be eligible for federally funded redevelopment.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions

Assess of Strengths and Gaps in the Institutional Delivery System

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Cincinnati Metropolitan Housing Authority	Public Housing Authority	Public Housing	Region
Strategies To End Homelessness	Continuum of Care	Homelessness; Non-homeless special needs	Region
City of Cincinnati	Government	Economic Development; Homelessness; Housing; Non-homeless special needs; Home ownership; Planning; Rental; Neighborhood improvements; Public facilities; Public services	Jurisdiction
Hamilton County	Government	Planning	Jurisdiction
Over-the-Rhine Community Housing	Community Housing Development Organization	Rental; Public services	Over-the-Rhine neighborhood and community
Working In Neighborhoods	Community Housing Development Organization	Home ownership; Rental; Public services	South Cumminsville, Northside, College Hill neighborhood and community
Nonprofit organizations	Nonprofits	Various depending on services provided	Jurisdiction

Table 53 - Institutional Delivery Structure

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement	X	X	X
Mobile Clinics	X	X	X
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol and Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
Other			

Table 54 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Services are provided to homeless persons, including chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth through a highly cooperative and collaborative network of service providers.

- Strategies to End Homelessness (STEH), the local Continuum of Care (CoC) lead organization, and Unified Funding Agency (UFA) for CoC funds, also administers the ESG and HOPWA programs.

- The United Way of Greater Cincinnati manages the City's supplemental grants to service providers as well in a collaborative process, with one of the priorities for such City funding being Reducing Homelessness.

- The local CoC's Coordinated Entry system oversees the prioritization of people experiencing homelessness into CoC-funded housing capacity within 16 different agencies, as well as VA funded housing programs, and targets housing services toward people and families that are chronically homeless.

- The Cincinnati Veterans Administration oversees HUD – Veteran's Affair Supportive Housing (VASH), Grants and Per Diem (GPD) and Supportive Services for Veteran's Families (SSVF) programs serving homeless Veterans in the jurisdictions. The VA also serves on the local CoC Board, and VA programs participate in the CoC's Coordinated Entry System alongside all CoC program.

- Lighthouse Youth and Family Services serves as the lead agency providing services to homeless and at-risk youth. Under the leadership of Lighthouse and STEH, the local CoC was one of the first ten in the nation to be selected to be a part of HUD's Youth Homelessness Demonstration Program.

- For almost twenty years, the Family Housing Partnership (FHP), made up of all of the family homelessness focused organizations within the CoC, has organized and coordinated services focused on serving families that are homeless or at risk. The FHP and STEH were instrumental in authoring the 2015 Solutions to Family Homelessness plan, which lays out a vision for preventing and reducing family homelessness, as described above.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

CoC-specific strengths:
- Low unsheltered count: Due to increased CoC-funded housing capacity, expanded Street Outreach services, and significant local investment in improving local emergency shelter facilities including from the City of Cincinnati and Hamilton County, in 2018 the local CoC had 14% of people experiencing homelessness sleeping unsheltered, compared to the national average of 34%.

- Flexible shelter capacity for single individuals: The CoC's largest emergency shelter provider has maintained a high amount of flexibility in its shelter operations, expanding and contracting its low-barrier shelter capacity based on demand for shelter by single individuals.

- Availability of Prevention Services: For one third the cost of helping a person after they become homeless ($4,000), a person can be prevented from experiencing homelessness

($1,300). Using non-HUD funding, shelter diversion services are available in the CoC to reduce the number of households that ultimately enter a homeless shelter.

- CoC lead agency Strategies to End Homelessness (STEH) has been designated by HUD as a Unified Funding Agency (UFA), one of only eight such CoCs in the country. As an UFA, STEH has the flexibility to shift and reallocate funding to meet the needs of homeless people in the community.

- In 2019, the CoC switched to the new Homeless Management Information System (HMIS), which provides STEH and the homeless services agencies with greater access to data that STEH is now able to analyze and use, for example, to predict who is most likely to become homeless and target prevention services toward those individuals.

Gaps:
- Lack of prevention: While homelessness prevention services are available in the community, the capacity is insufficient to meet the need, resulting in only about 1 out of 6 families that present for shelter receiving such services. An even lower percentage of single individuals at-risk receive such services.

- Lack of housing capacity: Even with an increase level of CoC funding, only 11% of people on the streets and in local shelters are provided with supportive housing.

- Lack of available affordable housing: Even households that receive a supportive housing subsidy, and therefore have immediate access to a rental deposit and first month rent, possibly more people have difficulty finding affordable rental units and/or property owners who are willing to rent to this population.

- Fixed family shelter capacity: It has been difficult for family shelters to expand and contract capacity as described above for homeless families. The system has demonstrated a need for flexible shelter capacity for homeless families.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

- Lack of prevention: Strategies to End Homelessness (STEH) has secured funding for prevention from the City of Cincinnati, Ohio Development Services Administration, Hamilton County Job and Family Services, the United Way of Greater Cincinnati and numerous foundations and private donors. Efforts to secure additional resources for prevention are ongoing.

- Lack of housing capacity: The CoC has secured additional CoC funding to expand housing capacity specifically to homeless youth, families, and people who are chronically homeless.

- Lack of available affordable housing: Through a strategic planning process conducted in 2019, the CoC Board identified the recruitment of new property owners, as well as the maintenance of relationships with property owners that are currently willing to rent to CoC clients, as a high priority. The CoC Board is in the process of forming a working group to lead a comprehensive property owner recruitment and retention initiative in 2020.

- Lack of available affordable housing: The City of Cincinnati will continue to support organizations who are actively working to provide housing choices for the broadest groups of residents. Also, the City has established and funded a City Housing Trust Fund to develop new affordable housing and improve and preserve existing housing, which all funds will be spent on households with income below 61% AMI with at least 50% of the funds reserved for households with income at or below 30% AMI. The Housing Trust Fund will be overseen by a Housing Trust Fund Advisory Board. Also, the City offers a Community Reinvestment Area Tax Abatement program which provides an increased tax abatement for housing projects that contribute to a Voluntary Tax Incentive Contribution Agreement which funds affordable neighborhood-based housing initiatives.

- Fixed family shelter capacity: Bethany House Services, the CoC's largest family shelter provider, is in the process of developing and building a new facility. This new facility would both consolidate what are currently multiple shelter buildings into one facility, reducing operating cost and creating efficiencies. This new facility would also be designed to allow for the seasonal expansion of family shelter capacity at time of peak demand.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Goal Name	Start Year	End Year	Needs Addressed	Geographic Area	Goal Outcome Indicator
Affordable Housing	2020	2024	Affordable Housing	City-wide	Rental units constructed; Rental units rehabilitated; Homeowner housing added; Homeowner housing rehabilitated; Direct financial assistance to homeowners
Public Services	2020	2024	Non-Housing Community Development	City-wide, NRSAs	Public service activities other than housing benefit
Economic Development	2020	2024	Non-Housing Community Development	City-wide	Businesses rehabilitated; Acres remediated; Businesses assisted
Neighborhood Stabilization	2020	2024	Non-Housing Community Development	City-wide	Rental units rehabilitated; Buildings demolished; Housing code enforcement
Homelessness Prevention	2020	2024	Homeless	City-wide	TBA; RRH; Homeless shelters; Homelessness prevention
Special Needs	2020	2024	Non-Homeless Special Need	EMSA	Housing and operations for persons with HIV/AIDS

Table 55 – Goals Summary

Goal Descriptions:

Goal Name	Program	Grant Program	Goal Outcome 2020 – 2024	Goal Indicator
Affordable Housing	American Dream Down-payment Initiative	HOME	100	Direct financial assistance to homebuyer
	Community Housing Development Organizations Development Projects	HOME	40	Rental units constructed
	Compliance Assistance Repairs for the Elderly	CDBG	50	Homeowner housing rehabilitated
	Floating Initiatives for Strategic Housing	CDBG		
	Homeowner Rehab Loan Servicing	CDBG		
	Housing Repair Services	CDBG	5,500	Homeowner housing rehabilitated
	Rotating Initiatives for Strategic Housing	CDBG		
	Strategic Housing Initiatives Program	CDBG HOME	50 100	Rehab units Units constructed
	Single Family Homeownership Program	HOME	15	Homeowner housing added
Public Services	Blueprint For Success	CDBG	35	Persons assisted
	Emergency Mortgage Assistance	CDBG	500	Persons assisted
	Fair Housing	CDBG	5,000	Persons assisted
	Hand Up Initiative	CDBG	2,500	Persons assisted
	Housing Choice Mobility Program	CDBG	50	Persons assisted
	Project Lift	CDBG	1,500	Persons assisted
	Tenant Representation	CDBG	1,000	Persons assisted
	Urgent Public Health Crisis Response Program	CDBG	1,000	Persons assisted
	Youth and Young Adult Employment Program	CDBG	2,500	Persons assisted
Economic Development	Commercial and Industrial Redevelopment	CDBG	10	Acres remediated

Goal Name	Program	Grant Program	Goal Outcome 2020 – 2024	Goal Indicator
Economic Development	Findlay Market Operating Support	CDBG	5	Businesses assisted
	Green Urban Watershed Restoration	CDBG	5	Businesses assisted
	Operating Support for Community Development Corporations	CDBG	40	Businesses assisted
	Operating Support for Community Housing Development Organizations	HOME	10	Businesses assisted
	Neighborhood Business District Improvement Program	CDBG	50	Businesses rehabilitated / Façade improvement
	Small Business Services	CDBG	200	Businesses assisted
Neighborhood Stabilization	Concentrated Code Enforcement	CDBG	100,000	Housing code enforcement
	Hazard Abatement Program	CDBG	1,250	Buildings demolished
	Historic Stabilization of Structures	CDBG	5	Rental units rehabilitated
	Lead Hazard Testing Program	CDBG	600	Housing code enforcement
	Vacant Lot Reutilization	CDBG	10	Other
Homelessness Prevention	Code Enforcement Relocation	CDBG	100	Persons assisted
	Homeless Shelters and Housing	ESG	20,000	Persons assisted
	Homelessness Prevention	ESG		
	Rapid Re-housing	ESG	200	Households assisted
Special Needs	Housing for Persons with HIV/AIDS – Short-Term Rental, Mortgage, Utility Assistance	HOPWA	1,000	Household housing unit
	Housing for Persons with HIV/AIDS – Rapid Re-housing, Tenant Based Rental Assistance	HOPWA	125	Household housing unit
	HIV/AIDS Housing Operations	HOPWA	125	Household housing unit

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 91.315(b)(2)

The following is an estimation of the number of extremely low-income, low-income, and moderate-income families that will be assisted throughout the City of Cincinnati's 2020 – 2024 Consolidated Plan:

Number of Persons Served	CDBG	HOME	ESG	HOPWA
Extremely Low-income	10,225 (0% - 30% AMI)	95 (0% - 30% AMI)	20,300 (0% - 30% AMI)	875 (0% - 30% AMI)
Low-income	7,015 (31% - 50% AMI)	50 (31% - 60% AMI)	0 (31% - 50% AMI)	162 (31% - 50% AMI)
Moderate-income	1,410 (51% - 80% AMI)	65 (61% - 80% AMI)	0 (51% - 80% AMI)	213 (51% - 80% AMI)
Non-Low-Moderate-income	1,400 (>80% AMI)	0 (>80% AMI)	0 (>80% AMI)	0 (>80% AMI)
Total	**20,050**	**210**	**20,300**	**1,250**

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Cincinnati Metropolitan Housing Authority (CMHA) is planning on converting additional units from its existing and future asset management units to Section 504 compliance standards, according to CMHA's 2020 Annual Action Plan. These units will be located throughout Hamilton County providing additional accessibility options for the families served. CMHA's current plan is to convert the units into fully Section 504 compliant units where feasible. All new development efforts are expected to meet or exceed HUD's Section 504 accessibility requirements where feasible.

Activities to Increase Resident Involvements

CMHA annual goals include:
- Partner with Community Based Organizations, community groups, and state agencies to collaborate on financial goals for the families;
- Continue to increase family income in the Housing Choice Voucher (HCV) Family Self-sufficiency Program;
- Expand portfolio to provide housing for special populations such as; multi-generational, work-force housing, veterans, individuals with disabilities and seniors, through development and project basing with partners; and
- Continue to engage with the Resident Advisory Board for input on annual goals and plans.

Is the public housing agency designated as troubled under 24 CFR part 902?

Cincinnati Metropolitan Housing Authority is not designated as troubled.

Plan to remove the 'troubled' designation

Not applicable as CMHA is not designated as a troubled public housing authority.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The City of Cincinnati Department of Community and Economic Development and Hamilton County Department of Community Development worked collaboratively on the 2019 Fair Housing Assessment for Cincinnati and Hamilton County for the 2020 – 2024 Consolidated Plan. The 20196 Fair Housing Assessment for Cincinnati and Hamilton County report provides an overview of the impediments of fair housing in the area. Federal law prohibits housing discrimination based on race, color, national origin, religion, sex, disability, or family status. Military and ancestry status are protected classes in the State of Ohio. In the City of Cincinnati, protected classes also include marital status, Appalachian origin, sexual orientation, and transgender status.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

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

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

SP-60 Homelessness Strategy – 91.215(d)

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

In the Cincinnati/Hamilton County CoC, 14% of the homeless population was encountered unsheltered during 2018, compared to the 34% estimated to be sleeping unsheltered nationally. The Homeless Outreach Group is a group of street outreach providers who meet monthly to discuss best practices and progress in engaging unsheltered homeless people in services. Representatives from all street outreach programs, other programs that serve unsheltered homeless people, and the Cincinnati Police, also attend.

There are four programs which provide street outreach services to all people who are unsheltered:
- Lighthouse Youth and Family Services, which targets homeless youth;
- Greater Cincinnati Behavioral Health's Projects for Assistance in Transition from Homelessness (PATH) Team, which targets people with mental health issues;
- Veterans Administration, which targets veterans sleeping unsheltered; and
- Cincinnati Center City Development Corporation, which targets services to people sleeping unsheltered in the urban core, specifically the downtown and Over-the-Rhine sections of the City of Cincinnati.

In 2019, street outreach capacity was temporarily increased as a part of the organization that previously provided street outreach services combined services with another program entitled Block-by-Block. As a result, the number of street outreach workers covering the downtown business district and Over-the-Rhine neighborhood increased from 1.5 to 3.0 full-time individuals. A goal is to keep this capacity in place.

Addressing the emergency and transitional housing needs of homeless persons

In 2018, the CoC and its partners provided emergency shelter to 6,509 people, and transitional housing to another 779.

For the past eight years, the CoC has operated the Winter Shelter, approximately 200 additional beds per night of low-barrier emergency shelter capacity from mid-December through the end of February. This low-barrier basic shelter option has proven very appealing to people who would have otherwise slept unsheltered, helping to reduce the number of people sleeping unsheltered. Another goal is to keep this capacity open year-round beginning in 2020.

Bethany House Services, the CoC's largest family shelter provider, is in the process of developing and building a new facility. This new facility would consolidate what are currently multiple shelter buildings into one facility, reducing operating cost and creating efficiencies. This new facility would also be designed to allow for the seasonal expansion of family shelter capacity at time of peak demand. Another goal is to realize the efficiencies that this new facility would provide, as well as to have flexible seasonal family shelter capacity to meet the need at times of peak demand.

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

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

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The following activities are ongoing:
- Shelter Diversion, which targets households that are living in doubled-up situations, running out of such places to stay, and will soon be entering an emergency shelter or sleeping unsheltered;

- Supportive Services for Homeless Veteran Families (SSVF), which provides a range of services, including prevention, for vulnerable veterans and veteran's families;
- Youth Aging out of Foster Care: Lighthouse Youth and Family Services targets toward preventing homelessness among youth who have been in the Foster Care system; and
- LGBTQ Youth Homelessness Prevention Initiative, begun through the HUD LGBTQ Youth Homelessness Prevention Demonstration program, and now led by Lighthouse Youth and Family Services as the *Safe and Supported* program.

SP-65 Lead Based Paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The City of Cincinnati administers a lead-based paint abatement grant program from HUD's Office of Lead Hazard Control and Healthy Homes – administered by the Department of Community and Economic Development in partnership with the Cincinnati Health Department Childhood Lead Poisoning Prevention Program (CHD CLPPP). Since 2007, HUD has awarded the City $19.4 million to address lead-based paint hazards in more than 1,200 qualified units, including single and multifamily buildings, with a focus on lead poisoning prevention in children under the age of six. The grant averages approximately $9,000 per home, which is comparable to the average cost laid out by the U.S. Environmental Protection Agency. Replacing windows is often the most expensive part of these renovations. The remainder of the grant covers administrative and educational costs, and the costs of training contractors and workers for licensed lead clean-up efforts.

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

How are the actions listed above related to the extent of lead poisoning and hazards?

Approximately 90% of the City's housing stock was built before 1980, which 1978 is the year that lead-based paint was outlawed. The risks of lead-based paint hazards are severe in the City of Cincinnati. According to the Ohio Department of Health (ODH), less than 1% of children tested positive for high levels of lead in their blood in 2012 compared to roughly 7.5% in 1999. Additionally, twice as many children were screened in 2012 when compared to 1999.

In 2012, ODH predicted the greatest probability of blood lead levels of 5 µg/dL or greater in the Hamilton County area is 45.83% in census tract 9, the Over-the-Rhine neighborhood, located in the City's historic urban core. ODH also reports a total of 63,464 children under the age of 6 in Hamilton County are at-risk for lead poisoning. The City of Cincinnati ranks second behind the City of Cleveland as having the most childhood lead poisoning cases in Ohio.

How are the actions listed above integrated into housing policies and procedures?

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

When available, the HUD Lead Hazard Control Grant program is open to eligible owner and tenant occupied units, as well as vacant units. All property owners and tenants interested in participating in the grant program are required to complete a formal application to determine eligibility. The grant program is only available to low- to moderate-income occupants.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

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

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

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The design and implementation of the plan and the subsequent programs are reflective of the need to reduce poverty and assist individuals from experiencing homelessness when possible:

- Blueprint For Success – construction training assisting ex-offenders, at-risk young adults and veterans;
- Code Enforcement Relocation – relocation assistance for persons required to relocate from unsafe and insanitary housing;
- Compliance Assistance Repairs for the Elderly – housing repairs for the City's extremely low-income elderly and disabled owners;
- Emergency Mortgage Assistance – foreclosure assistance and prevention for low- to extremely-low income owners;
- Fair Housing Services – fair housing assistance for low- to extremely-low income individuals experiencing unlawful discrimination;

- Hand Up Initiative – job training and counseling services to assist transitioning individuals out of poverty;
- Housing Choice Mobility Program – relocation services to move persons out of high poverty areas;
- Housing Repair Services – emergency and critical housing repairs for the City's extremely and very low-income owners;
- Operating Support for Community Development Corporations (CDCs) – operating and project support for area CDCs promoting community development and affordable housing;
- Project Lift – program designed to specifically assist individuals in poverty with the resources to improve self-sufficiency, including housing services, housing placement, and short-term payments for rent, mortgage, and/or utilities;
- Small Business Services – technical and financial assistance for small businesses with a focus on low- to moderate-income business owners;
- Strategic Housing Initiatives Program – gap financing for affordable housing projects;
- Tenant Representation – legal representation for low- to moderate income individuals;
- Urgent Public Health Crisis Response Program – public services for low- to moderate-income individuals experiencing hardship in response to a public health crisis;
- Youth and Young Adult Employment Program – employment training for youth and young adults with the aim at producing self-sufficiency;
- Emergency Solutions Grant Rapid Re-housing and Homeless Shelters and Other Homeless Housing Programs – focused entirely on individuals facing poverty to provide the resources necessary to prevent homelessness;
- Housing Opportunities for Persons With HIV/AIDS Services and Support – focused on low- to moderate-income individuals with HIV/AIDS to provide assistance with housing and preventing the individuals from experiencing homelessness;
- Community Housing Development Organizations Development Projects – gap financing for affordable housing projects;
- American Dream Down-payment Initiative – down payment assistance for low- to moderate-income individuals for first time homebuyers; and
- Single Family Homeownership Development – grant funding for affordable housing projects.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

CoC, ESG, and HOPWA awards are monitored by Strategies to End Homelessness, Inc. (STEH), a subrecipient for the administration of ESG and HOPWA with the City of Cincinnati and a prime recipient of all CoC funding, as United Funding Agency (UFA).

- Monthly CoC, ESG, and HOPWA invoicing includes a remote monitoring of dollars expended by provider agencies, matching spending to the approved budget allocations and to HUD allowable expenditures.
- All CoC, ESG, and HOPWA projects receive an annual on-site monitoring where source documentation, agency policies and procedures, and participant records are reviewed.
- Monitoring tools used are calibrated annually with the HUD Field Office monitoring tools to ensure consistency with HUD requirements.
- An annual risk-assessment is completed for all subrecipients to prioritize monitoring resources.
- HOPWA providers submit annual reporting to STEH, with specific excerpts from the HOPWA CAPER report according to activity funded. STEH compiles the responses and works with a HUD Technical Assistant to ensure accuracy.
- Annual on-site monitoring visit reports are submitted to the Department Community and Economic Development staff and to the Monitoring Subcommittee of the CoC Board.
- Department of Community and Economic Development staff include its review of STEH monitoring as part of the overall Compliance Strategy.

The City's Department of Community and Economic Development conducts an annual internal review of each HUD-funded program, which is outlined in an internal Compliance Strategy Document.   In addition to conducting ongoing monitoring of long-term affordability requirements and annually monitoring subrecipients, the City also conducts a systematic evaluation of its the programs and management systems to verify eligibility and compliance with applicable HUD regulations. When conducting these internal reviews, the Department utilizes IDIS reports, HUD Monitoring Exhibits, and HUD training materials. The Compliance Strategy Document also describes the monitoring processes, checklists, databases, and reports required for each program and is updated annually.

Expected Resources

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

Introduction

Anticipated Resources

Program	Expected Amount Available Year 1 – 2020				Narrative Description
	Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $	
CDBG	$11,695,886	$58,733	16,373,732	$28,129,701	Acquisition Administration Economic Development Housing Public Improvements Public Services
HOME	$2,816,464	$222,102	$6,176,804	$9,215,873	Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership Administration
HOPWA	$1,141,164	$2,269	$625,340	$1,768,773	Permanent housing in facilities Permanent housing placement STRMU Short term or transitional housing facilities Supportive services TBRA
ESG	$1,013,616	$0	$374,762	$1,388,378	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing

Table 56 - Expected Resources – Priority Table

The City of Cincinnati's 2020 Entitlement Awards and current program income amounts are listed above. HOME Investment Partnerships Program budgets 2020 allocation with 2019 program income to determine the total project amount available. CDBG budgets with 2020 entitlement

allocation and the program income received to date during calendar year 2020. At the end of the calendar year, CDBG will be reconciled with the remaining 2020 program income received to carry projects and activities through the first part of the next calendar year to avoid a disruption of services provided.

For CDBG, HOME, ESG, and HOPWA, the maximum caps are employed. The following illustrate the calculations for allocation the administration amounts:

CDBG Administration 20% cap:

CY2020 CDBG Grant Award	$11,695,886.00
+Program Income	$58,733.03
Total Amount	$11,755,969.03
-Administration (20%)	($2,349,843.00)
Maximum Program Amount	$9,404,776.03
-Less Section 108 debt service	($160,000.00)
CDBG Program Total	**$9,244,776.03**

CDBG Public Service 15% cap:

CDBG Program Total	$9,244,776.03
15% of Program Total	$1,386,716.40
Tenant Representation	$230,000.00
Emergency Mortgage Assistance	$190,000.00
Youth and Young Adult Employment	$450,000.00
Fair Housing Services	$170,000.00
Blueprint For Success	$100,000.00
Housing Choice Mobility Program	$0.00
CDBG Public Service Total Allocation	$1,140,000.00

The CDBG-funded programs Hand Up Initiative and Project Lift will focus on residents residing within an approved NRSA only.

HOME Administration 10% cap and CHDO Development Project 15% cap:

CY2020 HOME Grant Award	$2,816,967.00
+Program Income	$222,102.53
Total Amount	$3,039,069.53
-Administration (10%)	($270,684.00)
HOME Program Total	$2,768,385.53
15% of HOME Allocation for CHDO Development Projects	$422,546.00

The City of Cincinnati utilizes the Community Reinvestment Area Residential and Commercial Tax Abatement Program primarily for the HOME match requirements. Unless the City of Cincinnati is designated as a fiscally distressed jurisdiction with a reduced match liability requirement, the City will meet the required 25% match amount.

ESG 7.5% Administration Cap and emergency shelter activity cap:

CY2020 Grant Award	$1,013,616
Homeless Shelters and Other Homeless Housing (60% max of allocation)	$608,169
ESG Administration (7.5% max of allocation)	$76,021

HOPWA 3% Administration Cap:

CY2020 Grant Award	$1,141,164.00
HOPWA Administration (3% max of allocation)	$34,234.00

Each project sponsor receiving HOPWA funding is capped at 7% administration of the total funds received.

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

CDBG funds are used to leverage other public and private funds. The programs which leverage funds are the Neighborhood Business District Improvement Program (NBDIP); Strategic Housing Initiatives Program; Operating Support for Community Development Corporations (CDCs); Small Business Services; Commercial and Industrial Redevelopment; Historic Stabilization of Structures; Green Urban Watershed Restoration; Findlay Market Operating Support; and Vacant Lot Reutilization. Construction projects are funded as gap financing and are not the only source of funding for these projects.

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

The abatement can last 10 to 15 years, depending on the type of project. The savings from the tax abatement is utilized as the City's HOME local match requirement.

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

The City of Cincinnati owns vacant buildings and vacant lots in most of its fifty-two neighborhoods. Programs in the 2020 – 2024 Consolidated Plan to address the use of publicly owned land – Strategic Housing Initiatives Program and the Vacant Lot Reutilization Program. The City has compiled an inventory on the City owned parcels and properties. The available properties are posted on the City's website, www.choosecincy.com, with an interactive map and property descriptions. Redevelopment projects will be selected using a competitive process under a Notice Of Funding Availability application.

Discussion

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

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Goal Name	Start Year	End Year	Needs Addressed	Geographic Area	2020 Funding	Goal Outcome Indicator
Affordable Housing	2020	2021	Affordable Housing	City-wide	CDBG: $283,000 HOME: $2,627,537	Rental units constructed, Rental units rehabilitated, Homeowner housing added, Homeowner housing rehabilitated, Direct financial assistance to homeowners
Public Services	2020	2021	Non-Housing Community Development	City-wide, NRSAs	CDBG: $8,620,298	Public service activities other than housing benefit
Economic Development	2020	2021	Non-Housing Community Development	City-wide	CDBG: $197,677 HOME: $140,848	Businesses rehabilitated, Acres remediated, Businesses assisted
Neighborhood Stabilization	2020	2021	Non-Housing Community Development	City-wide	CDBG: $178,000	Rental units rehabilitated, Buildings demolished, Housing code enforcement
Homelessness Prevention	2020	2021	Homeless	City-wide	ESG: $937,595	TBA, RRH, Homeless shelters, Homelessness prevention
Special Needs	2020	2021	Non-Homeless Special Need	EMSA	HOPWA: $1,106,930	Housing and operations for persons with HIV/AIDS

Table 57 – Goals Summary

Goal Descriptions:

Goal Name	Program	Grant Program	Goal Outcome 2020	Goal Indicator
Affordable Housing	American Dream Down-payment Initiative	HOME	20	Direct financial assistance to homebuyer
	Community Housing Development Organizations Development Projects	HOME	8	Rental units constructed
	Compliance Assistance Repairs for the Elderly	CDBG	10	Homeowner housing rehabilitated
	Floating Initiatives for Strategic Housing	CDBG		
	Homeowner Rehab Loan Servicing	CDBG	1	Other
	Housing Repair Services	CDBG	1,100	Homeowner housing rehabilitated
	Rotating Initiatives for Strategic Housing	CDBG		
	Strategic Housing Initiatives Program	CDBG HOME	10 20	Rehab units Units constructed
	Single Family Homeownership Program	HOME	3	Homeowner housing added
Public Services	Blueprint For Success	CDBG	7	Persons assisted
	Emergency Mortgage Assistance	CDBG	100	Persons assisted
	Fair Housing	CDBG	1,000	Persons assisted
	Hand Up Initiative	CDBG	500	Persons assisted
	Housing Choice Mobility Program	CDBG	10	Persons assisted
	Project Lift	CDBG	300	Persons assisted
	Tenant Representation	CDBG	200	Persons assisted
	Urgent Public Health Crisis Response Program	CDBG	200	Persons assisted
	Youth and Young Adult Employment Program	CDBG	500	Persons assisted
Economic Development	Commercial and Industrial Redevelopment	CDBG	2	Acres remediated

Goal Name	Program	Grant Program	Goal Outcome 2020 – 2024	Goal Indicator
Economic Development	Findlay Market Operating Support	CDBG	1	Businesses assisted
	Green Urban Watershed Restoration	CDBG	1	Businesses assisted
	Operating Support for Community Development Corporations	CDBG	10	Businesses assisted
	Operating Support for Community Housing Development Organizations	HOME	2	Businesses assisted
	Neighborhood Business District Improvement Program	CDBG	10	Businesses rehabilitated / Façade improvement
	Small Business Services	CDBG	40	Businesses assisted
Neighborhood Stabilization	Concentrated Code Enforcement	CDBG	20,000	Housing code enforcement
	Hazard Abatement Program	CDBG	250	Buildings demolished
	Historic Stabilization of Structures	CDBG	1	Rental units rehabilitated
	Lead Hazard Testing Program	CDBG	120	Housing code enforcement
	Vacant Lot Reutilization	CDBG	2	Other
Homelessness Prevention	Code Enforcement Relocation	CDBG	20	Persons assisted
	Homeless Shelters and Housing	ESG	4,000	Persons assisted
	Homelessness Prevention	ESG		
	Rapid Re-housing	ESG	40	Households assisted
Special Needs	Housing for Persons with HIV/AIDS – Short-Term Rental, Mortgage, Utility Assistance	HOPWA	200	Household housing unit
	Housing for Persons with HIV/AIDS – Rapid Re-housing, Tenant Based Rental Assistance	HOPWA	25	Household housing unit
	HIV/AIDS Housing Operations	HOPWA	25	Household housing unit

Projects

AP-35 Projects – 91.220(d)

Introduction

Given the limited nature of resources, the City prioritizes the needs identified through the Consolidated Planning process to direct the allocation of funds in a manner that maximizes community impact. Through the City's budgeting process the following projects were funded to implement the Strategic Plan Goals. All entitlement annual allocations for CDBG, HOME, ESG, and HOPWA, current program income amounts and Section 108 proceeds received to date, and prior year resources expected to be available are listed in Table 56 in section AP-15.

Projects

#	Grant	Annual Goal Outcome	Program Name	Program Description
1	CDBG $100,000	7 persons assisted	Blueprint for Success	The Blueprint for Success Program is based on the Youth Build model, assisting ex-offenders, at-risk young adults, and veterans ages 18-30 in obtaining marketable construction skills while following a National Center for Construction Education and Research (NCCER) curriculum. Participants will undergo OSHA training, Lead Renovation, Repair, and Painting certification, and will receive on-the-job training as part of the curriculum.
2	CDBG $0	20 persons assisted	Code Enforcement Relocation	This project allows the City of Cincinnati to pay the first month's rent, security deposit, and moving expenses for persons moving to decent, safe and sanitary housing who have been displaced by code enforcement and/or the hazards of lead-based paint. City staff takes applications and provides vacancy and management company lists to clients.

#	Grant	Annual Goal Outcome	Program Name	Program Description
3	CDBG $456,776	2 acres	Commercial and Industrial Redevelopment Program	The Commercial and Industrial Redevelopment Program, formerly known as The Strategic Program for Urban Redevelopment (SPUR) facilitates catalytic redevelopment of abandoned, vacant, or underutilized industrial and commercial sites throughout the City. The program focuses on addressing environmental contamination and obstacles preventing development of blighted areas, specifically in areas with imminent threats to human health and the environment. The funds are utilized for environmental assessments, contamination remediation, public improvements, infrastructure improvements, acquisition, demolition, stabilization, construction, reconstruction, installation of public works and facilities, and other related activities to facilitate redevelopment.
4	CDBG $100,000	10 homeowner housing rehabilitated	Compliance Assistance Repairs for the Elderly (CARE)	The CARE program provides grants to low income, elderly and/or disabled homeowners to correct code violations issued pursuant to an exterior property condition inspection and code enforcement action. The assistance includes correcting emergency exterior code violations such as leaking roofs, dilapidated porches, unsafe stairs, exterior wall repair, and painting.

#	Grant	Annual Goal Outcome	Program Name	Program Description
5	CDBG $600,000	20,000 housing code enforcements	Concentrated Code Enforcement	Inspections of homes and businesses are conducted in low to moderate census tracts throughout the city by the City of Cincinnati Department of Buildings and Inspections' code enforcement inspectors. Corrections achieved through Concentrated Code Enforcement (CCE) include repairing porches, roofs, windows, and siding, painting, and removal of dilapidated garages, fences and sheds. Owners receiving orders are informed of funding availability through the Department of Community and Economic Development to correct violations. Targeted areas are identified through an analysis of building code violations, vacant buildings, disorder and drug calls, drug arrests, as well as incidence of graffiti, junk autos, litter and weeds. Integrated services include concentrating building code enforcement, identifying crime hot spots, cleaning up streets, sidewalks, and vacant lots, beautifying landscapes, streetscapes and public right of way, and engaging property owners and residents to create and sustain a more livable neighborhood.
6	CDBG $190,000	100 persons assisted	Emergency Mortgage Assistance	The Emergency Mortgage Assistance program provides in-depth foreclosure prevention counseling, negotiations with mortgage companies, legal assistance and case management to prevent foreclosure. When homeowners are facing foreclosure due to job loss, illness, death of the primary wage earner, or other circumstances beyond their control, the program may provide up to three months of mortgage payments to bring their loans current.

#	Grant	Annual Goal Outcome	Program Name	Program Description
7	CDBG $170,000	1,000 persons assisted	Fair Housing Services	Housing Opportunities Made Equal (H.O.M.E.), the area's local fair housing agency, administers this program to promote equal housing opportunities for all home seekers regardless of race, sex, color, nationality, religion, handicap, Appalachian status, marital status, sexual orientation, military, gender identity, ancestry, gender identity, transgender status, 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.
8	CDBG $100,000	1 business assisted	Findlay Market Operating Support	Project funds increase the Corporation for Findlay Market's capacity to carry out community revitalization and economic development activities both at the Market and in the surrounding area. Included in this are costs related to supporting market promotion and events to increase the vibrancy of the market. Findlay Market is located in a low to moderate income area in the City's urban core.

#	Grant	Annual Goal Outcome	Program Name	Program Description
9	CDBG		Floating Initiatives for Strategic Housing (FISH)	FISH will provide afloat loan for gap financing for the renovation of multifamily units and single-family development, permanent supportive housing, emergency stabilization, infrastructure, urban homesteading projects, and the construction, conversion, renovation, rehabilitation of shelters for the homeless, or assisting persons that are homeless and/or addicted to opioids by the acquisition, construction, reconstruction, installation, or rehabilitation of transitional housing (public facilities). Applicants can apply under the competitive Housing Notice Of Funding Availability (NOFA) that the City issues at least once a year. Applications must meet underwriting and subsidy layering requirements to be considered. Floating Initiatives for Strategic Housing is an opportunity for the City to spur transformative housing development by leveraging resources to revitalize City neighborhoods, creating long-term livability benefits.

#	Grant	Annual Goal Outcome	Program Name	Program Description
10	CDBG $50,000	1 business assisted	Green Urban Watershed Restoration	Green Urban Watershed Restoration will work to build and strengthen capacity in order to focus on community and economic development, public facilities, community engagement, streetscape activities, and increase professional capacity. Green Urban Watershed Restoration focuses on the urban environment and civic engagement to catalyze community-driven change creating community parks and green spaces, building healthy communities, revitalizing urban waters and the communities in the urban core. The program also includes a green workforce development program providing job readiness, basic environmental and technical skills, water testing, greenhouse skills, invasive species removal and green infrastructure improvement. Participants in the job training program will receive multiple certifications and trainings pertinent to this work and job sector at large.
11	CDBG $1,260,000	500 persons assisted	Hand Up Initiative	The Hand Up Initiative provides job readiness and job training to transition Cincinnatians out of poverty. The program will focus on residents in Neighborhood Revitalization Strategy Areas (NRSAs). The Hand Up Initiative recipients are tasked with providing individuals with wrap-around services for the purpose of removing barriers to employment. Those services include, but are not limited to, transportation, childcare, and employment counseling. Following completion of the Hand Up curriculum, participants receive employment counseling and coaching to facilitate appropriate job placement.
12	CDBG $750,000	250 buildings demolished	Hazard Abatement Program	The mission of the Hazard Abatement Program is to preserve public health, safety, and welfare through demolition or barricading of blighted buildings. The program demolishes condemned buildings after normal code enforcement activities have been exhausted. The program also secures vacant abandoned buildings against entry.

#	Grant	Annual Goal Outcome	Program Name	Program Description
13	CDBG $200,000	1 unit rehabilitated	Historic Stabilization of Structures	The Historic Stabilization of Structures Program abates public nuisance conditions and stabilizes historic properties. Under Ohio Law if there is a historic building that is deemed a public nuisance, the City has the right to abate the public nuisance conditions without taking ownership of the property. This program is designed to maintain the public health, safety, and welfare while at the same time preserving the historic structures for potential future rehabilitation.
14	CDBG $38,000	1 other	Homeowner Rehab Loan Servicing	This program provides funding to service prior year redevelopment loans. This program covers the cost of servicing past loans.
15	CDBG	10 persons assisted	Housing Choice Mobility Program	The Housing Choice Mobility Program promotes mixed-income neighborhoods, providing Housing Choice Voucher holders living in high poverty areas access to new neighborhoods.
16	CDBG $1,850,000	1,100 homeowner housing rehabilitated	Housing Repair Services	The Housing Repair Services Program provides 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 property owner and have a maximum of $10,000. This program will also address code violations for low income homeowners. In addition to addressing housing repairs for homeowners, this program addresses the mobility needs of disabled and elderly renters and owner-occupied units and will address healthy home issues that may be causing health effects of the occupants.

#	Grant	Annual Goal Outcome	Program Name	Program Description
17	CDBG $200,000	120 housing code enforcements	Lead Hazard Testing Program	Project funds are utilized for the code enforcement activities in eligible census tracts. Lead poisoning reduces IQ, increases tendencies of violence and delinquent behavior, affects a child's ability to learn, and is directly related to lower educational achievement. Children with lead poisoning have reduced lifetime earning potential and are more likely to live in poverty. Properties with Board of Health orders for lead hazard remediation are referred to the HUD Lead Paint Hazard Control Grant program when available.
18	CDBG $920,000	10 businesses rehabilitated	Neighborhood Business District Improvement Program	The Neighborhood Business District Improvement Program enhances the business environment in the City's neighborhood business districts by constructing streetscape, public improvements, public facilities, infrastructure, façade improvements, or other development activities. The projects are awarded on a competitive annual application process after an extensive peer review.
19	CDBG $300,000	10 businesses assisted	Operating Support for Community Development Corporations (CDCs)	This program provides operating and project support to build and strengthen capacity of eligible Community Development Corporations (CDCs). CDCs serve the region through rehabilitating affordable housing units, performing commercial and economic development, addressing public facilities and streetscape activities, and increasing community engagement in the neighborhoods.
20	CDBG $600,000	300 persons assisted	Project Lift	Project Lift will target low income individuals and families to provide supportive services and improve the economic self-sufficiency of families in the region, including access to affordable housing, housing services, permanent housing placement, short-term payments for rent, mortgage, or utilities, and assistance in gaining access to government benefits. The program will focus on residents in Neighborhood Revitalization Strategy Areas (NRSAs).

#	Grant	Annual Goal Outcome	Program Name	Program Description
21	CDBG		Revolving Initiatives for Strategic Housing (RISH)	RISH will provide revolving loan funds for gap financing for the renovation of multifamily units and single-family development, permanent supportive housing, emergency stabilization, infrastructure, urban homesteading projects, and the construction, conversion, renovation, rehabilitation of shelters for the homeless, or assisting persons that are homeless and/or addicted to opioids by the acquisition, construction, reconstruction, installation, or rehabilitation of transitional housing (public facilities). Applicants can apply under the competitive Housing Notice Of Funding Availability (NOFA) that the City issues at least once a year. Applications must meet underwriting and subsidy layering requirements to be considered. Revolving Initiatives for Strategic Housing is an opportunity for the City to spur transformative housing development by leveraging resources to revitalize City neighborhoods, creating long-term livability benefits.
22	CDBG $150,000	40 businesses assisted	Small Business Services	The Small Business Services Program includes technical assistance for start-ups and growth needs of micro-enterprises and small businesses. Areas of assistance include capacity development, business education and coaching, entrepreneurial training, incubation and technical assistance, loan packaging, accounting services, legal services, appraisals, environmental assessments, and inventory control audits. The program includes a revolving loan program to fill financing gaps for small to mid-sized businesses that create and/or retain jobs for low to moderate-income individuals as well as funds for redevelopment activities. The program also includes financial assistance for start-up small businesses and businesses with established need.

#	Grant	Annual Goal Outcome	Program Name	Program Description
23	CDBG $500,000	10 rehabilitated units	Strategic Housing Initiatives Program (SHIP)	SHIP provides gap financing for the renovation of multifamily units and single-family development, permanent supportive housing, emergency stabilization, infrastructure, urban homesteading projects, and the construction, conversion, renovation, rehabilitation of shelters for the homeless, or assisting persons that are homeless and/or addicted to opioids by the acquisition, construction, reconstruction, installation, or rehabilitation of transitional housing (public facilities). Applicants can apply under the competitive Housing Notice Of Funding Availability (NOFA) that the City issues at least once a year. Applications must meet underwriting and subsidy layering requirements to be considered. Strategic Housing Initiatives Program is an opportunity for the City to spur transformative housing development by leveraging resources to revitalize City neighborhoods, creating long-term livability benefits.
24	CDBG $230,000	200 persons assisted	Tenant Representation	The Tenant Representation Program provides legal representation for low to moderate-income tenants. The program prevents homelessness by stopping unlawful evictions, corrects illegal lockouts and utility shutoffs, and requires property owners to complete repairs to make rental units decent, safe, and sanitary. The project also prevents retaliation against tenants who contact the City about code violations.

#	Grant	Annual Goal Outcome	Program Name	Program Description
25	CDBG	200 persons assisted	Urgent Public Health Crisis Response Program	Urgent Public Health Response Program will assist low-income individuals and families experiencing hardship in response to public health crisis, including health services, childcare services, transportation services, job training, services for senior citizens, youth services, and services for homeless persons. The program will focus on response to public health crisis needs. This program is may also be a float loan activity if eligible. The program may also provide funding for the renovation of multifamily units and single-family development, permanent supportive housing, emergency stabilization, infrastructure, urban homesteading projects, and the construction, conversion, renovation, rehabilitation of shelters for the homeless, or assisting persons that are homeless and/or addicted to opioids by the acquisition, construction, reconstruction, installation, or rehabilitation of transitional housing (public facilities).
26	CDBG $30,000	2 gardens	Vacant Lot Reutilization	The Vacant Lot Reutilization program funds the reuse of vacant and blighted lots in eligible census tracts into gardens or pocket parks.
27	CDBG $450,000	500 persons assisted	Youth and Young Adult Employment Program	The Youth and Young Adult Employment Program trains youth and young adults ages 14 to 24 in the areas of workplace etiquette and basic work skills by utilizing workshops, presentations, and on-the-job experiences. The program provides recipients with opportunities to explore their interests and career options in public, nonprofit, and private organizations.

#	Grant	Annual Goal Outcome	Program Name	Program Description
28	HOME $150,000	20 direct financial assistance to homebuyer	American Dream Down-payment Initiative	The American Dream Down-payment Initiative (ADDI) program funds down payment assistance for the purchase of single-family owner-occupied housing by first-time, eligible low to moderate income homebuyers or eligible homebuyers that have not owned property in the last three years. ADDI funds are not to exceed $14,999. ADDI funds are awarded as a five-year non-interest-bearing deferred loan payment with a five-year residency requirement. All or a portion of the funds will be recaptured in the event a homeowner moves from the residence, sells or transfers ownership during the five-year residency period. All ADDI recipients are required to take a HUD-approved homebuyer counseling course in advance of receiving this assistance.
29	HOME	8 rental units constructed	CHDO Development Projects	HUD requires that at least 15% of the federal HOME allocation be used in development projects in partnership with Community Housing Development Organizations (CHDOs). These funds will be used for both rental and homeowner projects, new construction and renovations, with certified CHDOs. CHDOs are required to re-certify their designation bi-annually.
30	HOME $140,848	2 businesses assisted	Operating Support for Community Development Housing Organizations (CHDOs)	HUD allows that up to 5% of the federal HOME allocation may be used in operating support for Community Housing Development Organizations (CHDOs). These funds may be used to cover staff time, rent charges, and any other operating costs of the certified CHDOs.
31	HOME	3 homeowner housing added	Single Family Homeownership Development	Habitat for Humanity of Greater Cincinnati builds and renovates single family homes for low-to moderate-income homebuyers. The program provides construction subsidy and homebuyer assistance. Eligible costs include infrastructure and construction costs for newly constructed or rehabilitated units, construction alterations to blend units with existing neighborhood styles, and accessibility modifications.

#	Grant	Annual Goal Outcome	Program Name	Program Description
32	HOME $1,988,454	20 units constructed	Strategic Housing Initiatives Program (SHIP)	SHIP provides gap financing for construction and renovation of multifamily units and single-family development, and permanent supportive housing. Applicants can apply under the competitive Housing Notice Of Funding Availability (NOFA) that the City issues at least once a year. Applications must meet underwriting and subsidy layering requirements to be considered. Strategic Housing Initiatives Program is an opportunity for the City to spur transformative housing development by leveraging resources to revitalize City neighborhoods, creating long-term livability benefits.
33	ESG $937,595	4,000 persons assisted; 40 households assisted	Emergency Solutions Grant	ESG funds the operation of emergency shelter facilities as well as essential services for the residences. A current maximum of 60% the annual ESG entitlement allocation may be utilized for shelter funds. ESG Rapid Re-Housing activities include a shelter diversion program that will serve individuals and families at risk of homelessness by providing Housing Relocation and Stabilization Services under Homelessness Prevention and Rapid Re-Housing as well as long-term Tenant Based Rental Assistance (TBRA), security deposits, and utilities. ESG funds may also be used to fund Street Outreach services and protection for victims of domestic violence, dating violence, sexual assault or stalking.

#	Grant	Annual Goal Outcome	Program Name	Program Description
34	HOPWA $1,106,930	250 household units assisted	HOPWA Services and Support	HOPWA funds will provide housing assistance through Short-Term Rent, Mortgage, and Utility Assistance (STRMU), Tenant Based Rental Assistance (TBRA), and permanent housing placement. HOPWA-funded TBRA services to individuals with HIV/AIDS that require assistance with rent or mortgage expenses. HOPWA funds will also be used to support the operation of Caracole's two transitional living facilities persons displaced by HIV/AIDS. Costs will include utilities, phone, insurance, regular maintenance, supplies and residential operating staff. In addition, HOPWA funding will be used to support the cost of nursing and personal care, case management, and meals for HIV/AIDS clients. All four providers, Center for Respite Care, Northern Kentucky Health Independent District, Shelterhouse Volunteer Group, and Caracole, provide these services.
35	CDBG	$160,000	Section 108 Loan Debt Service	This covers debt service on existing CDBG Section 108 loans for Avondale Towne Center, Laurel Homes, Broadway Square, Anna Louise Inn and the Men's Shelter projects.
36	CDBG HOME ESG HOPWA	$2,349,843 $270,181 $76,021 $34,234	Administration	20% annual CDBG entitlement allocation; 10% annual HOME entitlement allocation; 7.5% annual ESG entitlement allocation; 3% annual HOPWA entitlement allocation

Table 58 – Project Information

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

The City allocated resources based upon community needs, the success of a program at addressing those needs, input from the public through the Community Development Advisory Board (CDAB) and the public hearing process. The CDAB is a volunteer group appointed by the Mayor and approved by City Council. The CDAB advises the City Manager on the Consolidated

Plan, Annual Action Plans, related resource allocations, and other matters related to the administration of the Consolidated Plan. The major obstacle in addressing the City of Cincinnati needs is a lack of funding. The CDAB, the public, and City staff ranked each project in the CDBG and HOME grant program. All projects that were recommended were approved for funding in CY 2020.

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

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

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

Generally, HOME, ESG and HOPWA funds will continue to fund the same programs as in previous years. CDBG funding has changed significantly from the 2015 – 2019 Consolidated Plan period; changes were made to address the priority needs identified to ensure timely expenditure of funds.

AP-50 Geographic Distribution – 91.220(f)

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

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

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

Geographic Distribution

Target Area	Percentage of Funds
NRSA	25%
City-wide	75%

Table 59 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Discussion

For the CDBG program, the City of Cincinnati will be submitting for HUD approval new Neighborhood Reinvestment Strategy Areas (NRSA) with a new term. An NRSA is a geographical area within a neighborhood that is primarily residential and contains 70% or more of low- and moderate-income residents. NRSA designations assists with targeting CDBG resources in support of community revitalization efforts. The residential portions of the following neighborhoods that will be analyzed for NRSA eligibility are: Avondale; Bond Hill; Camp Washington; Carthage; Corryville; CUF; East End; East Price Hill; East Westwood; English Woods; Evanston; Kennedy Heights; Linwood; Lower Price Hill; Madisonville; Millvale; Mount Airy; Mount Auburn; North Fairmount; Northside; Over-the-Rhine; Pendleton; Riverside; Roselawn; Sedamsville; South Cumminsville; South Fairmount; Spring Grove Village; Villages at Roll Hill; Walnut Hills; West End; West Price Hill; Westwood; and Winton Hills.

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

as HIV prevalence data, and allocates available HOPWA funds according to needs within the community.

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

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless (Homelessness Prevention)	60
Non-Homeless (American Dream Down-payment Initiative, Emergency Mortgage Assistance)	120
Special-Needs (HOPWA)	200
Total	**380**

Table 60 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance (TBRA, Rapid Re-Housing, STRMU, Code Enforcement Relocation)	125
The Production of New Units (Strategic Housing Initiatives Program, CHDO Development Projects, Single Family Homeownership Development, West Price Hill Redevelopment, Cincinnati Housing Improvement Fund)	41
Rehab of Existing Units (Compliance Assistance Repairs for the Elderly, Housing Repair Services)	1,110
Acquisition of Existing Units	0
Total	**1,276**

Table 61 - One Year Goals for Affordable Housing by Support Type

Discussion

The City of Cincinnati has developed these goals in the 2020 – 2024 Consolidated Plan based on actual outcomes from the 2015 – 2019 Consolidated Plan, the needs analysis, community surveys, and market analysis. The goals listed are conservative to account for any unforeseen issues with the programs. The City anticipates exceeding all goals listed.

AP-60 Public Housing – 91.220(h)

Introduction

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

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

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

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

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

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

planning and partnerships where possible; provision of comprehensive plan and solution for community / site revitalization which includes people, housing, and neighborhoods and partners where possible; provision of housing opportunities and choice for income tiers of 0 – 120% AMI for seniors, families, and other populations; and creation of synergistic economic development and economic inclusion with and within communities.

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

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

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

The Cincinnati Metropolitan Housing Authority (CMHA) is not designated as a troubled PHA.

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

Introduction

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

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

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

Expand low-barrier shelter capacity:

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

Improve the availability of affordable housing:

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

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

In the Cincinnati/Hamilton County CoC, 14% of the homeless population was encountered unsheltered during 2018, compared to the 34% estimated to be sleeping unsheltered nationally. The Homeless Outreach Group is a group of street outreach providers who meet monthly to discuss best practices and progress in engaging unsheltered homeless people in services. Representatives from all street outreach programs, other programs that serve unsheltered homeless people, and the Cincinnati Police, also attend.

There are four programs which provide street outreach services to all people who are unsheltered:
- Lighthouse Youth and Family Services, which targets homeless youth;
- Greater Cincinnati Behavioral Health's Projects for Assistance in Transition from Homelessness (PATH) Team, which targets people with mental health issues;
- Veterans Administration, which targets veterans sleeping unsheltered; and
- Cincinnati Center City Development Corporation, which targets services to people sleeping unsheltered in the urban core, specifically the downtown and Over-the-Rhine sections of the City of Cincinnati.

In 2019, street outreach capacity was temporarily increased as a part of the organization that previously provided street outreach services combined services with another program entitled Block-by-Block. As a result, the number of street outreach workers covering the downtown business district and Over-the-Rhine neighborhood increased from 1.5 to 3.0 full-time individuals. A goal is to keep this capacity in place.

Addressing the emergency shelter and transitional housing needs of homeless persons

In 2018, the CoC and its partners provided emergency shelter to 6,509 people, and transitional housing to another 779.

For the past eight years, the CoC has operated the Winter Shelter, approximately 200 additional beds per night of low-barrier emergency shelter capacity from mid-December through the end of February. This low-barrier basic shelter option has proven very appealing to people who would have otherwise slept unsheltered, helping to reduce the number of people sleeping unsheltered. Another goal is to keep this capacity open year-round beginning in 2020.

Bethany House Services, the CoC's largest family shelter provider, is in the process of developing and building a new facility. This new facility would consolidate what are currently multiple shelter buildings into one facility, reducing operating cost and creating efficiencies. This new facility would also be designed to allow for the seasonal expansion of family shelter capacity at time of peak demand. Another goal is to realize the efficiencies that this new facility would provide, as well as to have flexible seasonal family shelter capacity to meet the need at times of peak demand.

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

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

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

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

The following activities are ongoing:

- Shelter Diversion, which targets households that are living in doubled-up situations, running out of such places to stay, and will soon be entering an emergency shelter or sleeping unsheltered;
- Supportive Services for Homeless Veteran Families (SSVF), which provides a range of services, including prevention, for vulnerable veterans and veteran's families;
- Youth Aging out of Foster Care: Lighthouse Youth and Family Services targets toward preventing homelessness among youth who have been in the Foster Care system; and
- LGBTQ Youth Homelessness Prevention Initiative, begun through the HUD LGBTQ Youth Homelessness Prevention Demonstration program, and now led by Lighthouse Youth and Family Services as the *Safe and Supported* program.

AP-70 HOPWA Goals - 91.220 (l)(3)

HUD allows the following uses of HOPWA funds:
- Housing Information and Permanent Housing Placement;
- Project-based or tenant-based rental assistance;
- New construction of a community residence or SRO (single room occupancy) dwelling;
- Acquisition, rehabilitation, conversion, lease or repair of facilities to provide housing and services;
- Operating costs for housing;
- Short-term rent, mortgage, and utility payments to prevent homelessness;
- Supportive services; and
- Administrative expenses (limited to 7% of total annual entitlement allocation).

The City of Cincinnati elects to use the funds only for these purposes:
- Housing Information and Permanent Housing Placement;
- Project-based or tenant-based rental assistance;
- Operating costs for housing;
- Short-term rent, mortgage, and utility payments to prevent homelessness;
- Supportive services; and
- Administrative expenses (limited to 7% of total annual entitlement allocation).

Within these activities, the local community, through the HOPWA Advisory Committee has determined it necessary to shift resources toward two particular needs:
- Supportive services for HOPWA eligible clients residing within emergency shelter; and
- Site-based Permanent Supportive Housing.

One-year goals for the number of households to be providing housing through the use of HOPWA for:

Short-term rent, mortgage, and utility assistance payments	200
Tenant-based rental assistance	25
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	25
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	**250**

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

Introduction

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

The City of Cincinnati Department of Community and Economic Development and Hamilton County Department of Community Development worked collaboratively on the 2019 Fair Housing Assessment for Cincinnati and Hamilton County for the 2020 – 2024 Consolidated Plan. The 2019 Fair Housing Assessment for Cincinnati and Hamilton County report provides an overview of the impediments of fair housing in the area. Federal law prohibits housing discrimination based on race, color, national origin, religion, sex, disability, or family status. Military and ancestry status are protected classes in the State of Ohio. In the City of Cincinnati, protected classes also include marital status, Appalachian origin, sexual orientation, and transgender status.

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

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

AP-85 Other Actions – 91.220(k)

Introduction

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

Actions planned to address obstacles to meeting underserved needs

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

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

Actions planned to foster and maintain affordable housing

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

Actions planned to reduce lead-based paint hazards

The City of Cincinnati administers a lead-based paint abatement grant program from HUD's Office of Lead Hazard Control and Healthy Homes – administered by the Department of Community and Economic Development in partnership with the Cincinnati Health Department Childhood Lead Poisoning Prevention Program (CHD CLPPP).   Since 2007, HUD has awarded the City $19.4 million to address lead-based paint hazards in more than 1,200 qualified units, including single and multifamily buildings, with a focus on lead poisoning prevention in children under the age of six. The grants average approximately $9,000 per home, which is comparable to the average cost laid out by the U.S. Environmental Protection Agency. Replacing windows is often the most

expensive part of these renovations. The remainder of the grant covers administrative and educational costs, and the costs of training contractors for licensed lead clean-up efforts.

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

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

Actions planned to reduce the number of poverty-level families

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

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

The design and implementation of the plan and the subsequent programs are reflective of the need to reduce poverty when possible:

- Blueprint For Success;
- Code Enforcement Relocation;
- Compliance Assistance Repairs for the Elderly;
- Emergency Mortgage Assistance;

- Fair Housing Services;
- Hand Up Initiative;
- Housing Choice Mobility Program;
- Housing Repair Services;
- Operating Support for Community Development Corporations;
- Project Lift;
- Small Business Services;
- Strategic Housing Initiatives Program;
- Tenant Representation;
- Urgent Public Health Crisis Response Program;
- Youth and Young Adult Employment Program;
- Emergency Solutions Grant Rapid Re-housing and Homeless Shelters and Other Homeless Housing Programs;
- Housing Opportunities for Persons With HIV/AIDS Services and Support;
- Community Housing Development Organizations Development Projects;
- American Dream Down-payment Initiative; and
- Single Family Homeownership Development.

Actions planned to develop institutional structure

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

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

Audits conducted by the HUD Office of Inspector General (OIG) of the City's HOME Program in 2007 and 2008 led the City to review its practices and procedures. The City formalized all

processes and procedures and provides direction for basic processes in the administration of the Consolidated Plan programs for the following departments: Office of Budget and Evaluation, Finance Department, City Planning, Office of Economic Inclusion, Law Department, and Community and Economic Development.

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

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

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

The City of Cincinnati partnered with Hamilton County Department of Community Development to update the 2019 Fair Housing Assessment for the 2020 – 2024 Consolidated Plan. A committee representing will meet periodically to continue work towards solutions to the recommendations.

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

agency, and at least one homeless or formerly homeless community member. The CoC Board meets monthly to oversee planning, coordinate efforts, and monitor progress on the goals of the Consolidated Plan.

Program Specific Requirements

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

Introduction
Community Development Block Grant Program (CDBG)

CDBG, HOME, ESG, and HOPWA are reported on a calendar year (CY) basis from January 1st through December 31st. The program income amount listed is the amount received to date in CY 2020. All program income received during the calendar year will be allocated to established programs of the same year.

Reference 24 CFR 91.220(l)(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	$848,658.08
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
The amount of income from float-funded activities	0
5. The amount of program income expected to be received during the program year – received to date in CY 2020:	$58,733.03
Total Program Income	**$907,391.11**

Other CDBG Requirements

The program Urgent Public Health Crisis Response Program has been established in response to public health crisis.

1. The amount of urgent need activities	1
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income	70%

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. With each year in the 2020 – 2024 Consolidated Plan, the current and two prior years averaged benefit will be utilized. There are four programs that utilize the slum and blight spot benefit national objective: Commercial and Industrial Redevelopment, Hazard Abatement Program, Historic Stabilization of Structures, and Neighborhood Business District Improvement Program. These programs comprise of 25% of the funding available for projects and only a portion of these funds will be reported as slum and blight.

HOME Investment Partnerships Program (HOME)

Reference 24 CFR 91.220(l)(2)

The jurisdiction must describe activities planned with HOME funds expected to be available during the year:

HOME is reported on a calendar year (CY) basis from January 1st through December 31st. The program income amount of $222,102.53 is the amount received in CY 2019 that will be programmed during CY 2020. All program income received during a calendar year will be allocated to established programs of the same year.

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

The City of Cincinnati plans to continue to operate its HOME Investment Partnerships Program similar to previous years. As such, other forms of investment of equity payments, interest-bearing and non-interest-bearing loans or advances, interest subsidies, deferred payment loans, grants, and loan guarantees are not planned as part of the 2020 – 2024 Consolidated Plan. There are no planned repayments or recaptured funds in local accounts.

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

Throughout the 2020 – 2024 Consolidated Plan, the City will continue to assist homebuyers directly with down payment assistance through the HOME funded program American Dream Down-payment Initiative Program (ADDI). The direct homebuyer assistance provided follows the HOME affordable homeownership limits for the area. There are no programs established to provide HOME-funded rehabilitation assistance for owner occupied single-family housing. Eligible applicants for the ADDI program are accepted year-round on a first-come first-serve basis

and must be first-time homebuyers who will reside in the home as their primary residence for five years. The City defines first-time home buyers as not having owned a home for at least three years. The City does not limit the beneficiaries or provide preference to any population. The City does not intend to utilize subrecipients or CHDOs in administering the ADDI program. Applications for the ADDI program are available at the City's office and also located on the City of Cincinnati's website: https://choosecincy.com/resources/communities/

The recapture provisions are stated in each homebuyer down payment funding agreement and are enforced through the homebuyer agreement, mortgage, and promissory note throughout the affordability period.   The City utilizes the recapture provision for all assistance to homebuyers. The assistance is provided as a 5-year deferred forgivable loan where upon 20% is forgiven each year the homebuyers remain in the home as their principal residence.   Included below is the recapture language used in contracts for the City's Homebuyer Assistance program:

The loan shall be made subject to the following terms:
*Borrower acknowledges that the purpose of the Homebuyer Assistance Loan is to assist Borrower in purchasing a home that will be owned and occupied by Borrower as Borrower's principal place of residence for a period of no less than five (5) years following the date hereof (the "**Affordability Period**"). If Borrower consists of more than one person, the condition of residency shall be met only if both or all of such persons own and continuously occupy the Property throughout the Affordability Period.*

> *(a) For each consecutive 12-month period following the date hereof that Borrower owns and occupies the Property as Borrower's principal place of residence, twenty percent (20%) of the original amount of the Homebuyer Assistance Loan shall be forgiven at the end of each such 12-month period.*
>
> *(b) If Borrower ceases to own and continuously occupy the Property as Borrower's principal place of residence during the Affordability Period, then, on the date on which Borrower ceases to own and occupy the Property as Borrower's principal place of residence (a "**Recapture Event**"), Borrower shall immediately notify the City thereof in writing and shall pay the portion of the Homebuyer Assistance Loan that has not previously been forgiven, without interest, to the City. (For example, if Borrower owns and occupies the Property for 4 consecutive years, 80% of the Homebuyer Assistance Loan will be forgiven, and Borrower shall pay the City an amount equal to 20% of the Homebuyer Assistance Loan.)   If Borrower sells or otherwise transfers title to the Property to a third party during the Affordability Period, the portion of the Homebuyer Assistance Loan not previously forgiven shall be due and payable on the date of closing of such sale or transfer. There shall be no proration of amounts forgiven for periods of less than 12 months. The repayment amount, if not paid in full at the time of the*

Recapture Event, shall bear interest at the rate of ten percent (10%) per annum until fully paid. The City shall release the mortgage upon receipt of the entire repayment amount.

(c) *If Borrower continuously owns and occupies the Property as Borrower's principal place of residence throughout the Affordability Period, the entire amount of the Homebuyer Assistance Loan shall be forgiven upon the expiration of the Affordability Period. If there is no Recapture Event, Borrower shall, upon the expiration of the Affordability Period, send a written notice to the City requesting the City to release the mortgage. During the Affordability Period, the City shall have the right to conduct periodic inspections of the Property to determine whether or not a Recapture Event has occurred.*

The amount subject to recapture upon voluntary sale or foreclosure before the affordability period has ended is the direct subsidy received by the homebuyer and the amount to be recaptured is limited to the net proceeds available from the sale or foreclosure. The net proceeds are the sales price less the loan repayment (other than the HOME funds) and closing costs. In the event the homebuyers refinance at any point during the affordability period, the City will subordinate the mortgage only if refinancing is in order to obtain a more favorable loan term.

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 HOME funded rental development program, Strategic Housing Initiatives Program and CHDO Development Projects. Developers and property owners who receive HOME funds for rental development are required to keep the assisted units available for occupancy by tenants meeting HOME income guidelines throughout the applicable affordability period. The 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 the City's Restrictive Covenant. 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 this priority over their mortgage. This preserves the project's HOME affordability requirement in case of an adverse property transfer. The City added the Mortgagee Consent in June 2012 to strengthen the City's protection of the HOME affordability period. Subsequent purchasers of the property must fulfill the remaining time of the affordability period. A mortgage is also recorded on the parcel 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.

The loan shall be made subject to the following terms:

Throughout the Affordability Period, Owner shall rent all HOME-assisted dwelling units at the Property to households with a household income (as defined in 24 CFR 5.609) that is below the applicable household income established from time to time by the U.S. Department of Housing and Urban Development ("Tenant Income Guidelines"). Under the current Tenant Income Guidelines, (i) each HIGH HOME-assisted dwelling unit must be rented to a household with a household income below sixty percent (60%) of the median area household income for comparably sized households and (ii) each LOW HOME-assisted dwelling must be rented to a household with a household income below fifty percent (50%) of the median area household income for comparably sized households. Owner shall determine the household income as of the time that the household initially occupies the Property, and Owner shall verify such income, using third party source documentation supplied by the applicant, at least once every six years during the Affordability Period. Additionally, Owner shall re-certify the household income at the time of lease renewal or changes in income as provided in the Federal Regulations. On an annual basis, Owner shall verify its continued compliance with the affordability terms of the Restrictive Covenant by certifying Project rents and verifying tenant eligibility by submitting to the City a Tenant Income and Rent Guidelines Worksheet and an Income Certification Form for all households occupying HOME-assisted units. The Income Certification Form must be signed by and certified by each tenant and indicate that the information is complete and accurate. In the event that a tenant's household income exceeds HUD's Low or High-income limits during a tenancy, the tenant who becomes over income after initial income certification will be allowed to stay in the unit. However, tenants who no longer qualify as low-income families and whose household income is in excess of eighty percent (80%) of Area Median Income (AMI) must pay as rent the lesser of the amount payable by the tenant under State or local law or thirty percent (30%) of the family's adjusted income, except that tenants of HOME-assisted units that have been allocated low-income housing tax credits must pay rent governed by Section 42 of the Internal Revenue Code of 1986 (26 U.S.C. 42). If a household's current annual income exceeds the eligibility limit, the unit continues to qualify as a HOME and/or housing tax credit unit as long as Owner fills the next available unit with an eligible household. The next available unit would be one of similar or larger size than the one occupied by the over-income tenant. Owner shall complete a Rental Rehabilitation Program Occupancy Affidavit annually throughout the Affordability Period. Throughout the Affordability Period, Owner shall comply with, and shall cause each tenant to comply with, all other HUD verification and compliance reporting requirements. Information concerning the Tenant Income Guidelines is available from the City's Department of Community and Economic Development.

MORTGAGEE CONSENT TO RESTRICTIVE COVENANT

<<MORTGAGEE NAME>>, with an address of <<MORTGAGEE'S ADDRESS>> ("Mortgagee") for valuable consideration paid, hereby consents to the foregoing Restrictive Covenant ("Covenant") and waives and subordinates the priority of that certain Mortgage from <<MORTGAGOR>>, <<ENTITY STATUS>>, dated <<DATE MORTGAGE EXECUTED>>, and recorded <<DATE MORTGAGE RECORDED>> in Official Record _____, Page _____, Hamilton County, Ohio Records (the "Mortgage"), which is a lien upon the subject property, in favor of the Covenant, in the same manner and with the same effect as though the Covenant had been executed and recorded prior to the filing for record of the Mortgage, but without otherwise affecting the lien or priority of the Mortgage.

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 2020 through 2024.

Emergency Solutions Grant (ESG)

Reference 91.220(l)(4)

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

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

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

system.

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

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

The City of Cincinnati and Hamilton County, as the local ESG recipients, determine the exact amount of ESG funding that will go toward shelter operations and Rapid Re-housing, within HUD requirements.

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

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

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

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

regarding facilities and services funded under ESG.

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

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

Additionally, STEH monitors all ESG subrecipients annually and subrecipients are required to have a homeless or formerly homeless individual on their agency board.

5. **Describe performance standards for evaluating ESG.**

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

The total amount of administration of ESG is capped at 7.5% annually. The maximum amount allocated for emergency shelter activities will not exceed the greater of 60% of the annual allocation or the 2010 amount committed for homeless assistance activities of $555,000. There are no planned street outreach activities.

Discussion – identified method for selecting project sponsors:

The HOPWA entitlement program is administered by Strategies To End Homelessness who receives the 3% of the annual allocation for administration. There are currently four project

sponsors, each of which are budgeted up to 7% of their award for administration of the program. The four agencies are Caracole, Inc., Center for Respite Care, Inc., Northern Kentucky Independent Health District, and Shelterhouse Volunteer Group, Inc. A HOPWA Advisory Committee comprised of City of Cincinnati representatives and key stakeholders in the community, including members from representatives from each project sponsor, Ohio Development Services Agency, HIV/AIDS drug programs, Ryan White service providers, care programs and homeless programs, convene regularly to share progress and provide oversight to the HOPWA funding allocation process. The HOPWA Advisory Committee provides diverse perspectives on HIV/AIDS issues. During the annual allocation meeting, the HOPWA Advisory Committee takes the eligible metropolitan statistical area (EMSA) geographic needs and past performance and spending by the project sponsors into account to inform funding recommendations to the City of Cincinnati. A sub-committee of the HOPWA Advisory Committee meets frequently to develop and enhance EMSA-wide HOPWA policies and procedures to ensure consistency in service provision.