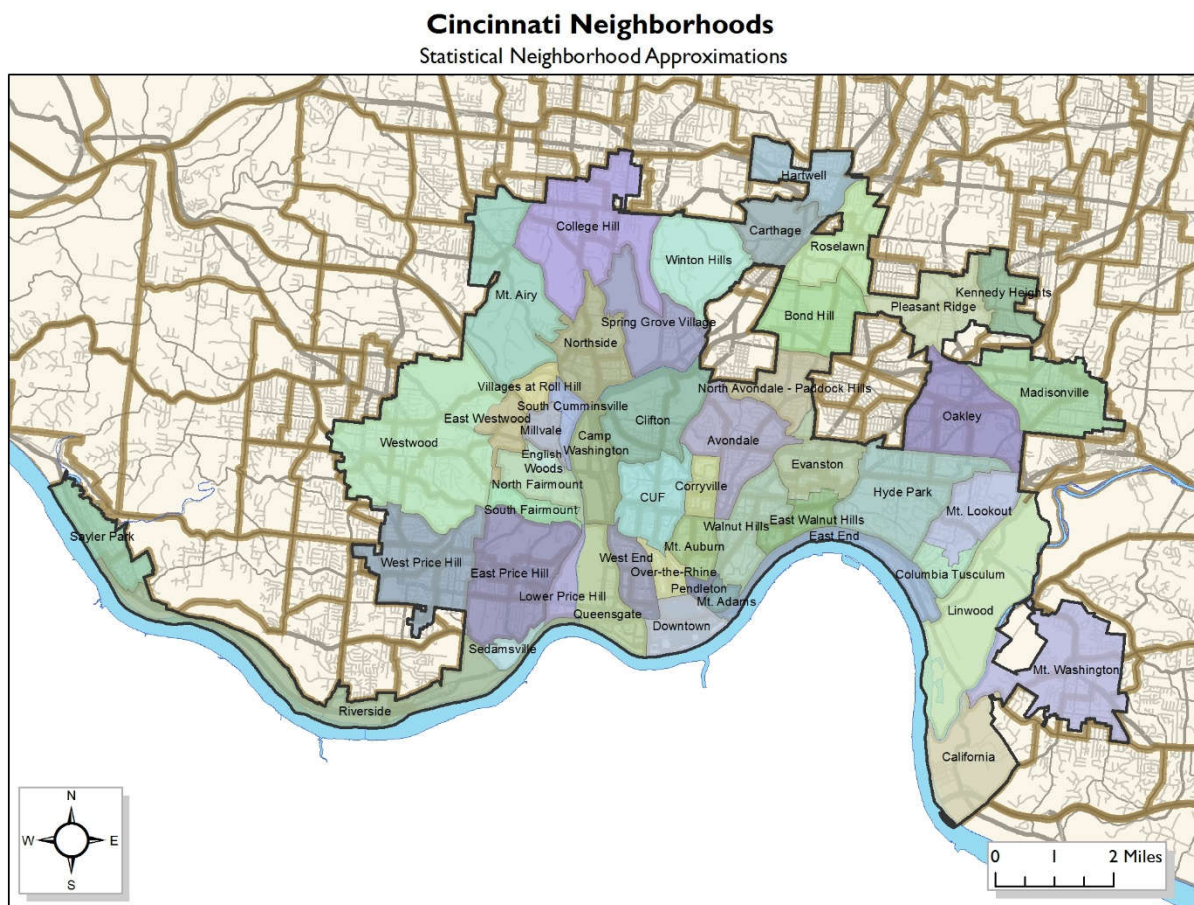




# City of Cincinnati 2022 Annual Action Plan



## Executive Summary

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

#### 1. Introduction

The City of Cincinnati's 2022 Annual Action Plan presents a series of initiatives to be accomplished between January 1, 2022 and December 31, 2022, which corresponds to the City's Fiscal Year 2022 (January 1, 2022 to June 30, 2022) and Fiscal Year 2023 (July 1, 2022 to December 31, 2022). The purpose of the Action Plan is to ensure that public services, economic development, and housing services are delivered in an efficient and effective manner. The Annual Action Plan identifies various programs administered and subsidized with the use of federal funds. Most importantly, the Annual Action Plan reflects the annual goals and objectives set-forth in the Five-Year 2020 – 2024 Consolidated Plan.

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

Community Development Block Grant (CDBG)  
HOME Investment Partnerships Program (HOME)  
Housing Opportunities for Persons with HIV/AIDS (HOPWA)  
Emergency Solutions Grant (ESG)

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

All documents are available on the City of Cincinnati's website and at City of Cincinnati Department of Community and Economic Development's office:

<https://www.cincinnati-oh.gov/community-development/hud-entitlement-grant-submissions/>

**2. Summarize the objectives and outcomes identified in the Plan – This could be a restatement of items, or a table listed elsewhere in the plan or a reference to another location. It**

*may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.*

The City's Five-Year Goals, Objectives and Related Outcomes are outlined in 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
  - 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 Lead Agency and United Funding Agency, 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 \$550,000 is set aside annually for shelter and related supportive services and operation, with this amount is currently maxed at 60% of the annual ESG entitlement allocation; and
    - Rapid Re-housing projects receive the balance of the funding for eligible expenses, such as Housing Relocation and Stabilization Services and short and medium-term tenant-based rental assistance.

- 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; and
  - Supportive services including case management and nursing care for 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 administration policy direction.

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

Accomplishment data for Calendar Year 2021 of the 2020 – 2024 Consolidated Plan’s goals and objectives were reported in the 2021 Consolidated Annual Performance and Evaluation Report (CAPER), which was submitted to HUD on March 31, 2022.

**4. Summary of Public Participation Process and consultation process** – *Summary from public participation section of plan.*

The City of Cincinnati’s Office of the City Manager 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. On March 7, 2022, the entitlement programs accomplishments from calendar year 2022 were presented to the City’s Community Development Advisory Board (CDAB) and the public. At this meeting, which was held virtually, the board also provided funding priority recommendations for the established programs for 2022.

After the entitlement grants were awarded on May 13, 2022, the recommended budget was distributed and presented to administrating departments on June 3, 2022. The City Manager submitted a Recommended Annual Action Plan Budget to City Council’s Budget and Finance Committee for deliberation on June 6, 2022, and final Council approval on June 8, 2022. The City Council approval process includes another opportunity for public input.

**5. Summary of public comments** – *This could be a brief narrative summary or reference an attached document from the Public Participation section of the Con Plan.*

A public participation survey was distributed to the community August 25, 2021 and was kept open and accessible on-line until March 22, 2022. The public was engaged to select the top community needs which represented projects established in the 2020 – 2024 Consolidated Plan. Information regarding each program in CDBG and HOME was provided, ESG and HOPWA have separate advisory boards. A total of 315 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 March 7, 2022 to discuss the 2022 funding priority recommendations. 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 recommended CDBG, HOME, ESG, and HOPWA budgets were presented before the City of Cincinnati's Budget and Finance Committee on June 6, 2022. The funding recommendations were based on CDAB and public priorities. Cincinnati Council passed the entitlement ordinances on June 8, 2022.

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

The City of Cincinnati implemented the majority of the public and staff comments received while determining the funding for the programs.

Comments not considered included issues around transportation, illegal activities, and other concerns which are needs not addressed by the Consolidated Plan.

## **7. Summary**

City Council made final appropriation decisions for the 2022 Annual Action Plan Budget and took the CDAB prioritization into consideration. The public participation process included engagement from a variety of residents and community leaders.

## PR-05 Lead and Responsible Agencies – 91.200(b)

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

Agency Role	Name	Department/Agency
CDBG Administrator	City of Cincinnati	Office of the City Manager
HOME Administrator	City of Cincinnati	Office of the City Manager
ESG Administrator	City of Cincinnati	Office of the City Manager
HOPWA Administrator	City of Cincinnati	Office of the City Manager

**Table 1 – Responsible Agencies**

### **Narrative (optional)**

The City of Cincinnati City Manager’s Office administers the Consolidated Plan entitlement grants and oversees the individual projects. Projects are administered by seven other city departments: City of Cincinnati Department of Community and Economic Development, City of Cincinnati Department of Buildings and Inspections, Cincinnati Recreation Commission, Cincinnati Fire Department, Cincinnati Police Department, Cincinnati Parks, and Cincinnati Health Department Childhood Lead Poisoning Prevention Program.

The City of Cincinnati partners with Strategies to End Homelessness (STEh) to facilitate the administration, implementation, and monitoring of the Emergency Solutions Grant and Housing Opportunities for Persons With HIV/AIDS programs.

### **Consolidated Plan Public Contact Information**

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(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 2022 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(l))**

- 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 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.

**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 Agency (UFA). In addition to STEh’s contractual relationships with HUD, STEh works with the City of Cincinnati to administer ESG and HOPWA funds, and to facilitate the work of the community related to homelessness. This work includes the following program types:

- Shelter diversion / Homelessness Prevention;

- Street outreach;
- Emergency shelter;
- Transitional housing;
- Permanent Housing, including:
  - Rapid Re-housing;
  - Permanent supportive housing; and
- 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 persons experiencing homelessness not receiving HUD funding. The CoC also does the following:

- Assesses capacity and identifies gaps;
- Monitors and evaluates compliance and performance achieved by funded programs;
- 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 persons experiencing homelessness; and
- Develops policies and procedures to ensure compliance and optimal performance.

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;
- Permanent Supportive Housing Work – group;
- Transitional / Rapid Re-Housing Work – group;
- Racial Equity Core team, working to racial equity throughout the system; and



- Emergency Shelter Workgroup, focusing on optimizing services persons experiencing homelessness in emergency shelter receive.

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

STEH facilitates the annual “Prince of Peace” process to allocate ESG shelter funding, an allocation based upon program performance. First, funding is allocating using a bed night calculation for participation. Higher performing projects, as demonstrated by HMIS (Homeless Management Information System) data, are recommended for a higher level of funding. The allocation process is based on established performance measures developed in collaboration with the ESG recipients and subrecipients. Then, during the annual Price of Peace meeting, each agency provides a brief program description and requests changes to the proposed allocation based on facility needs in the coming year. A consensus is reached regarding the final recommended allocation for each agency and the allocation is submitted to the City and County for review, approval, and inclusion in their respective Annual Action Plans. If issues arise with any ESG funded emergency shelter, issues are brought to the attention of Strategies to End Homelessness, and the Homeless Clearinghouse, the CoC Board.

HMIS required updates are provided by our vendor, Bitfocus. The STEH HMIS team confirms the updates, implements any changes required that are not completed by the vendor, and maintains updated support documentation and training for users. The STEH HMIS team monitors HMIS performance and data quality daily and reports issues to the vendor or users as needed. STEH HMIS team meets with agency staff (Agency HMIS Leads) quarterly to review updates, answer questions, and receive feedback on the HMIS system. STEH HMIS also has an HMIS support phone line and email so any user can ask questions, report issues, or request features/updates. Requests for changes or new users are approved by the Agency HMIS Lead.

The standard procedure for policy development in our CoC, including for HMIS policies is that it is reviewed by all stakeholders within the CoC, including STEH’s Compliance Department, to review for fidelity to HUD’s and other federal regulations. The HMIS Policy is then shared with the Agency HMIS Leads and each CoC workgroup to get a wide cross-section of feedback. Once each work group has reviewed, potentially revised and then approved a policy, it will then be presented to the CoC’s governing board, the Homeless Clearinghouse, for a vote. The Clearinghouse may call for further revision or may approve. Once the Clearinghouse approves the policy, it is added to the appropriate CoC policy lists as well as being published to the

Community on STEH's website. All HMIS users are notified of changes via the HMIS email Newsletter.

**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	<b>Agency/Group/Organization</b>	Community Development Advisory Board
	<b>Agency/Group/Organization Type</b>	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
	<b>What section of the Plan was addressed by Consultation?</b>	Consolidated Plan and Annual Action Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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	<b>Agency/Group/Organization</b>	Cincinnati – Hamilton County Continuum of Care
	<b>Agency/Group/Organization Type</b>	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
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Annual Action Plan
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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 and reflected in the 2021 Annual Action 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.
<i>Plan Cincinnati</i> 2012	City of Cincinnati	The 2020 – 2024 Consolidated Plan and 2020 Annual Action 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 <i>Plan Cincinnati</i> (November 2012).
<i>Family Homelessness Services Study</i> 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**

## **AP-12 Participation – 91.105, 91.200(c)**

### **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 public meetings, including the Community Development Advisory Board (CDAB) meetings, to discuss yearly allocations and performance reports, City Bulletin posting of each meeting, public notice postings, 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.

In finalizing the 2022 Annual Action Plan Budget, the City accepted comments received from the public during calendar year 2021. The input was received via an on-line survey that was opened during the spring of 2021. 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 June 6, 2022, with City Council final approval on June 8, 2022. The funding recommendations were based on CDAB priorities, public priorities, City staff recommendations, prior years' resources, program performance, and current crisis situation.

Any major changes to the Strategic Plan, including the addition or removal of a program, 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, notice to the Community Development Advisory Board (CDAB), recommendation from the City Manager and approval from City Council through an Authorizing Ordinance if a funding ordinance is required. 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.

CDAB Results:

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

Public Input Results: [https://www.surveymonkey.com/r/cincinnati\\_speaks\\_2021](https://www.surveymonkey.com/r/cincinnati_speaks_2021)

Rank	Community Priority	Federally Funded Program
1	Homelessness prevention and assistance	Project Lift
2	Improving neighborhood business districts	Neighborhood Business District Improvement Program
3	Rehab, new construction of affordable housing	Strategic Housing Initiatives Program
4	Homeowner repair assistance for very low-income persons	Housing Repair Services, Homeowner Assistance Repairs and Building Order Relief
5	Housing repairs for the elderly and/or disabled	Compliance Assistance Repairs for the Elderly

6	Employment training programs for the under- and non-employed	Hand Up Initiative
7	Historic building preservation	Historic Stabilization of Structures
8	Converting vacant lots into pocket parks or urban gardens	Vacant Lot Reutilization
9	Youth and young adult job training programs	Youth and Young Adult Employment Program
10	Small business assistance and loans	Small Business Services
11	Legal assistance for tenants	Tenant Representation
12	Environmental cleanup of contaminated sites	Commercial and Industrial Redevelopment
13	Findlay Market assistance and expansion	Findlay Market Operating Support
14	Down payment assistance for first time homebuyers	American Dream Downpayment Initiative
15	Lower concentrations of poverty in your neighborhood	Housing Choice Mobility Program
16	Operating support for non-profit community development organizations	Operating Support for CDCs
17	Building code violation enforcement	Concentrated Code Enforcement
18	Mill Creek watershed improvement	Green Urban Watershed Restoration
19	Housing discrimination assistance	Fair Housing Services
20	Childhood lead poisoning prevention	Lead Hazard Testing Program
21	Displacement assistance from dilapidated housing	Family Re-Housing Assistance
22	Demolishing and barricading vacant buildings	Hazard Abatement Program
23	On-the-job training programs in construction	Blueprint for Success
24	Emergency mortgage payment assistance and counseling	Emergency Mortgage Assistance

## 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	315	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 Meeting	March 7, 2022 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, June 3, 2022	City of Cincinnati Department of Community and Economic Development, City of Cincinnati Buildings and Inspections, Cincinnati Recreation Center, Cincinnati Police Department, Cincinnati Fire Department, Cincinnati Parks Department, Cincinnati Health Department	Program descriptions were enhanced and expanded to include flexibility in delivery.
5	Cincinnati Council	Public Hearing	June 6, 2022, June 8, 2022	The City Council voted on 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, Monthly meetings	STEh provided input regarding the needs and priorities of the homeless and special needs population.	

**Table 4 – Public Participation Outreach**



## Expected Resources

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

#### Introduction

#### Anticipated Resources

Program	Expected Amount Available Year 3 – 2022			Narrative Description
	Annual Allocation: \$	Program Income (PI): \$	Total: \$	
<b>CDBG</b>	\$11,379,516	2021 PI: \$1,470,554.92 2022 PI: \$154,782.53 (not appropriated)	\$12,850,070.92	Acquisition Administration Economic Development Housing Public Improvements Public Services
<b>HOME</b>	\$3,029,588	2021 PI: \$211,042.76	\$3,240,630.76	Homebuyer assistance Multifamily rental new construction Multifamily rental rehab Development for ownership Administration
<b>HOPWA</b>	\$1,696,715	\$0	\$1,696,715	Permanent housing in facilities Permanent housing placement STRMU Short term or transitional housing facilities Supportive services TBRA
<b>ESG</b>	\$989,809	\$0	\$989,809	Emergency Shelter operations and supportive services Rapid re-housing (short and medium-term rental assistance and Housing Stability Services)

**Table 5 - Expected Resources – Priority Table**

The City of Cincinnati's 2022 Entitlement Awards and current program income amounts are listed above. HOME Investment Partnerships Program budgets 2022 allocation with 2021 program income to determine the total project amount available. CDBG budgets with 2022 entitlement allocation and the program income received to date during calendar year 2022 will be appropriated at a later time. During 2022, the 2021 program income for CDBG was appropriated to established 2021 CDBG programs. At the end of the calendar year, CDBG may be reconciled

with the total 2022 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 of the administration amounts:

**CDBG Administration 20% cap:**

CY2021 CDBG Grant Award	\$11,379,516
-Administration (20%)	\$2,275,903
Maximum Program Amount	\$9,103,613
-Less Section 108 debt service	\$400,000
<b>CDBG Program Total</b>	<b>\$8,703,613</b>

**CDBG Public Service 15% cap:**

15% of 2022 Entitlement	\$1,706,927
Blueprint For Success	\$50,000
Emergency Mortgage Assistance	\$215,000
Fair Housing Services	\$170,000
Housing Choice Mobility Program	\$0
Tenant Representation	\$255,000
Youth and Young Adult Employment	*\$910,000
<b>CDBG Public Service Total Allocation</b>	<b>\$1,600,000</b>

\*Total for the calendar year, 2022 CDBG entitlement and 2021 CDBG Program Income

The CDBG-funded programs Hand Up Initiative and Project Lift will focus on residents residing within an approved NRSA only, unless flexibility is offered for public service activities due to the crisis situation.

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

CY2022 HOME Grant Award	\$3,029,588.00
+Program Income	\$211,042.76
Total Amount	\$3,240,630.76
-Administration (10%)	\$324,063.00
HOME Program Total	\$2,916,567.76
15% of HOME Allocation for CHDO Development Projects	\$454,439
5% of HOME Allocation for CHDO Operating Support	\$151,479

The City of Cincinnati utilizes the Community Reinvestment Area Residential and Commercial Tax

Abatement Program primarily for the local 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:**

CY2022 Grant Award	\$989,809
Homeless Shelters and Other Homeless Services (60% max of allocation)	\$593,885
ESG Administration (7.5% max of allocation)	\$74,235

**HOPWA 3% Administration Cap:**

CY2022 Grant Award	\$1,696,715
HOPWA Administration (3% max of allocation)	\$50,901

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

For additional resources for the City of Cincinnati, the City is anticipating applying for a CDBG Section 108 loan pool up to the current availability. The current Section 108 Loan Authority availability is \$33,918,880. The City passed Ordinance 122-2021 to provide submission of a Substantial Amendment to the 2020 – 2024 Consolidated Plan to apply in an amount up to \$34,000,000 for the purposed of funding a loan pool for financing the acquisition and rehabilitation costs related to affordable housing. The Ordinance was passed by City Council on April 14, 2021.

**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 American Dream Downpayment

Initiative (ADDI) 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](http://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	Needs Addressed	Geographic Area	2021 Funding	Goal Outcome Indicator
Affordable Housing	Affordable Housing	City-wide	CDBG: \$2,588,613 HOME: \$2,765,088	Rental units constructed, Rental units rehabilitated, Homeowner housing added, Homeowner housing rehabilitated, Direct financial assistance to homeowners
Public Services	Non-Housing Community Development	City-wide, NRSAs	CDBG: \$2,490,000	Public service activities other than housing benefit
Economic Development	Non-Housing Community Development	City-wide	CDBG: \$1,875,000 HOME: \$151,479	Businesses rehabilitated, Acres remediated, Businesses assisted
Neighborhood Stabilization	Non-Housing Community Development	City-wide	CDBG: \$1,620,000	Rental units rehabilitated, Buildings demolished, Housing code enforcement
Homelessness Prevention	Homeless	City-wide	ESG: \$915,574	TBRA, RRH, Homeless shelters, Homelessness prevention
Special Needs	Non-Homeless Special Need	EMSA	HOPWA: \$1,645,814	Housing and operations for persons with HIV/AIDS

**Table 6 – Goals Summary**

#### Goal Descriptions:

Goal Name	Program	Grant Program	Goal Outcome 2022	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 Assistance Repairs and Building Order Remission	CDBG	15	Homeowner housing rehabilitated
	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

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	Family Re-Housing Assistance	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, and current program income amounts and Section 108 proceeds received to date are listed in Table 5 in section AP-15. Projects that did not receive an allocation for calendar year 2022 may have prior year resources available in order to address the established goals.

#### Projects

#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
1	CDBG  \$50,000  Public Services	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 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.



#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
2	CDBG  \$500,000  Economic Development	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, prevent and mitigate the spread of environmental contamination and / or risk to human health, and other related activities to facilitate redevelopment.
3	CDBG \$0  (prior resources available) Affordable Housing	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.

#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
4	CDBG  \$585,000  Neighborhood Stabilization	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.
5	CDBG  \$215,000  Public Services	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.

#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
6	CDBG  \$170,000  Public Services	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.
7	CDBG  \$130,000  Homeless Prevention	20 persons assisted	Family Re-Housing Assistance	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.
8	CDBG  \$75,000  Economic Development	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.

#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
9	CDBG  Affordable Housing		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.

#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
10	CDBG  Economic Development	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  \$1,100,000  Public Services	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.

#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
12	CDBG  \$750,000  Neighborhood Stabilization	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.
13	CDBG  \$200,000  Neighborhood Stabilization	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  \$250,000  Affordable Housing	15 rehabilitated units	Homeowner Assistance Repairs and Building Order Remission	Homeowner Assistance Repairs and Building Order Remission (HARBOR). The program will provide financial assistance to low-income, owner-occupied homeowners that receive code violations on their property.
15	CDBG (prior resources available) Affordable Housing	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.
16	CDBG (prior resources available) Public Services	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.

#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
17	CDBG  \$1,988,613  Affordable Housing	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. Critical repairs are those needed for the safety of the property owner. 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.
18	CDBG  (prior resources available)  Neighborhood Stabilization	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.
19	CDBG  \$900,000  Economic Development	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.

#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
20	CDBG  \$300,000  Economic Development	10 businesses assisted	Operating Support for Community Development Corporations (CDCs)	This program provides operating and project support to build and strengthen capacity of eligible non-profit Community Development Corporations (CDCs). Eligible entities serve the region through developing affordable housing units, performing commercial and economic development, addressing public facilities and streetscape activities, violence prevention / reduction, neighborhood safety, and increasing community engagement in the neighborhoods.
21	CDBG  \$200,000  Public Services	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).



#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
22	CDBG  Affordable Housing		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.

#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
23	CDBG  \$100,000  Economic Development	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.

#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
24	CDBG  \$350,000  Affordable Housing	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.
25	CDBG  \$255,000  Public Services	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.

#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
26	CDBG  (prior resources available)  Public Services	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 float activities may last for up to 2.5 years before program income is received. The activities may if eligible be reimbursed by program income from various resources that may be available at a later date.
27	CDBG  \$85,000  Neighborhood Stabilization	2 gardens / pocket parks	Vacant Lot Reutilization	The Vacant Lot Reutilization program funds the reuse of vacant and/or blighted lots in eligible census tracts into gardens, farms, parks, neighborhood facilities, and/or recreational facilities.
28	CDBG  \$500,000  Public Services	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.

#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
29	HOME  (prior resources available)  Affordable Housing	20 direct financial assistance to homebuyer	American Dream Downpayment Initiative	The American Dream Downpayment 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.
30	HOME  \$454,439  Affordable Housing	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.
31	HOME  \$151,479	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.

#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
32	HOME  Affordable Housing	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.
33	HOME  \$2,310,649  Affordable Housing	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.
34	ESG  \$915,574  Homelessness Prevention	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 will provide Housing Relocation and Stabilization Services and short and medium-term Tenant Based Rental Assistance (TBRA).

#	2021 Allocation	Annual Goal Outcome	Program Name	Program Description
35	HOPWA  \$1,645,814  Special Needs	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. Services are provided by three sponsor agencies, Center for Respite Care, Northern Kentucky Health Independent District, and Caracole.
36	CDBG  \$400,000		Section 108 Loan Debt Service	This covers debt service on existing CDBG Section 108 loans for and for eligible expenses supporting Section 108 loan applicants.
37	CDBG  HOME  ESG  HOPWA	\$2,275,903  \$324,063  \$74,235  \$50,901	Administration	20% annual CDBG entitlement allocation; 10% annual HOME entitlement allocation; 7.5% annual ESG entitlement allocation; 3% annual HOPWA entitlement allocation

**Table 7 – Project Information**

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

The City allocated resources based upon community needs, the success of a program at addressing those needs, input from 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 for funding was approved for CY 2022.

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.

The City added a new program to CDBG entitled Housing Assistance Repairs and Building Order Remission (HARBOR) in 2021. The program was informed and enhanced by public input requesting greater homeowner assistance resources in response to building orders. The program also received Community Development Advisory Board and public approval through the public engagement process through the CDAB meeting. This CDBG-funded program will provide financial assistance to low-income, owner-occupied homeowners that receive code violations on their property. It is estimated that a total of 15 homes will be addressed annually.

The Cincinnati Metropolitan Housing Authority (CMHA) received a HUD Choice Neighborhood Planning grant program that is set to conclude during 2022. CMHA, after having completed the planning process, will be applying for a HUD Choice Neighborhoods Implementation Grant in order to implement the transformation plan to redevelop the neighborhood of Westend. The project will be a partnership between CMHA, local non-profit community development corporations, and the City of Cincinnati. The City of Cincinnati has provided a commitment of funding in support of the project in the amount of \$2,500,000 allocated to the CDBG program entitled Operating Support for CDCs. The funds were sunset from various programs that had prior years resources available. The proposed project is located in the Over-the-Rhine – West



End NRSA. Further information about the project can be found at the following website:  
<https://www.westendchoice.org>

Generally, HOME, ESG and HOPWA funds will continue to fund the same programs as in previous years.

## **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 sixteen counties in the area.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
NRSA	25%
City-wide	75%

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

#### **Discussion**

For the CDBG program, the City of Cincinnati has received HUD approval for the current Neighborhood Reinvestment Strategy Areas (NRSA) that will be in effect through 2024. 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 have been approved as an NRSA 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 4 Indiana Counties (Dearborn, Franklin, Ohio, and Union). Although the three agencies that currently receive HOPWA funding are located in the Greater Cincinnati area, collectively they offer HOPWA assistance to persons in any of the 16 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
<b>Total</b>	<b>380</b>

**Table 9 - 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
<b>Total</b>	<b>1,276</b>

**Table 10 - 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 the 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. 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 Downpayment 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 stimulus funds available through the Hamilton County and Ohio Department of Development; 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;
- Emergency shelter will be provided in a more efficient way to families experiencing homelessness, so that services can be effectively provided; 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, 15.1% of the homeless population experienced unsheltered homelessness during 2021, compared to the 39% estimated by the National Alliance to End Homelessness to be sleeping unsheltered nationally in 2021. 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's "GeneroCity 513" project 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 2021, the number of full-time street outreach workers covering the downtown business district and Over-the-Rhine neighborhood stands at four, surpassing the previous goal of 3.0 full-time individuals.

## **Addressing the emergency shelter and transitional housing needs of homeless persons**

In 2021, the CoC and its partners provided emergency shelter to 6,062 people, and transitional housing to another 632. These shelters include both singles and family shelters as well as both congregate and non-congregate temporary emergency sheltering. For instance, for the past two years during the COVID-19 public health emergency, the CoC has operated extra capacity for low barrier shelter during winter in both congregate and non-congregate temporary emergency shelter. In the winter of 2020/21, the added low barrier shelter capacity was approximately 200 additional beds per night from mid-December through the end of March. In the winter of 2021/22, the additional low barrier shelter capacity was approximately 230 beds per night. These low-barrier basic shelter options have proven a safe alternative for people who would have otherwise slept unsheltered.



**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**

**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 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;
- Addition of efficient, flexible family shelter capacity; and
- Implementation of a CoC-wide initiative to make the homeless services system more racially equitable to improve services and outcomes for the population that makes up the majority of the homeless population.

## AP-70 HOPWA Goals - 91.220 (I)(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;
- Project Sponsor Administrative expenses (limited to 7% of total annual entitlement allocation); and
- Grantee Administrative expenses (limited to 3% of the 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;
- Project Sponsor Administrative expenses (limited to 7% of total annual entitlement allocation); and
- Grantee Administrative expenses (limited to 3% of the total annual entitlement allocation).

### 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
<b>Total</b>	<b>250</b>

## **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, natural hair types and natural hair styles commonly associated with race 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 people 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, Homeowner Assistance Repairs and Building Order Relief, 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 Office of the City Manager in partnership with Department of Community and Economic Development and the Cincinnati Health Department Childhood Lead Poisoning Prevention Program (CHD CLPPP). Since 2007, HUD has awarded the City \$22.9 million to address lead-based paint hazards in more than 1,400 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 \$12,000 per unit,

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 approximately 24% of households below the poverty level. In order to reduce poverty throughout the jurisdiction, the City has enacted strategies including:

- Economic development programs specifically reducing poverty include workforce development investments through job training programs and small business and entrepreneur lending and technical assistance programs;
- With 24 Community Development Corporations (CDCs) recognized by the City working in 28 out of the 52 neighborhoods, the City funds CDCs with CDBG, HOME, and City General Funds;
- 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 approximately 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;
- Family Re-Housing Assistance;

- 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 the City Manager, 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, 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 the 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)

Leads, Homeless Outreach Group, Permanent Supportive Housing Group, Rapid Rehousing / Transitional Housing Group, Homeless Veteran's Group, Coordinated Entry Group, Youth Workgroup, and Shelter Workgroup. Representatives of most work groups, 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(I)(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 1<sup>st</sup> through December 31<sup>st</sup>. The program income amount listed is the amount received to date in CY 2021. All CDBG program income received during the calendar year will be allocated to established programs of the same year.

## Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
The amount of income from float-funded activities	0
5. The amount of program income received during the prior program year – received to date in CY 2021:	\$1,470,554.92
The amount of program income <i>expected</i> to be received during the current program year – CY 2022:	\$1,000,000.00
<b>Total Program Income Estimated</b>	<b>\$2,470,554.92</b>

## 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  | 0   |
| 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 five programs that utilize the slum and blight spot benefit national objective: Commercial and Industrial Redevelopment, Hazard Abatement Program, Historic Stabilization of Structures, Neighborhood Business District Improvement Program, and Strategic Housing Initiatives Program. These programs comprise of approximately 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 1<sup>st</sup> through December 31<sup>st</sup>. The program income amount of \$211,042.76 is the amount received in CY 2021 that is programmed during CY 2022. All program income received during the prior calendar year is allocated to established programs of the next 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 two planned repayments in local accounts in the amount of \$8,841 for two down payment activities that were funded and then drawn with expired funding prior to the closing not occurring.

**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 Downpayment 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 eligible homebuyers who will reside in the home as their primary residence for five years. The City defines first-time home buyers as not having owned a home for at least three years. The City does not limit the beneficiaries or provide preference to any population. The City does not intend to utilize subrecipients or CHDOs in administering the ADDI program. Applications for the ADDI program are available at the City's office and also located on the City

of Cincinnati's website: <https://choosecincy.com>

The 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 City does not utilize the resale provision with the homebuyer assistance program. 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:**

For single family development projects, the City does not utilize the resale provision but requires down payment assistance for the eligible homebuyer and implements the recapture provision as a 5-year deferred forgivable loan where upon 20% is forgiven each year the homebuyers remain in the home as their principal residence. With HOME funded rental development, the City does not implement either the recapture or resale provision and instead prohibits restricts property transfer during the affordability period for all HOME funded rental development program. Subsequent purchasers of the property must fulfill any remaining time and compliance provisions of the affordability period. 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. 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(I)(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 24 CFR 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 ESG Policies and Procedures 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](http://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 limitations.

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 recommendation 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 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; and
5. Facilitate responses to issues and concerns that affect the agencies funded by the CoC that are beyond those addressed in the annual CoC application process.

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

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

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

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

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

The total amount of administration of ESG is capped at 7.5% annually. The maximum amount allocated for emergency shelter activities will not exceed the greater of 60% of the annual allocation or the 2010 amount committed for homeless assistance activities of \$555,000. 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 3% of the annual allocation for administration. There are currently three project sponsors, each of which are budgeted up to 7% of their award for administration of the program. The three agencies are Caracole, Inc., Center for Respite Care, Inc., and Northern Kentucky Independent Health District. A HOPWA Advisory Committee comprised of City of Cincinnati representatives and key stakeholders in the community, including members from representatives from each project sponsor, HIV/AIDS drug programs, Ryan White service providers, care programs and homeless programs, members from the HIV healthcare community and local health departments, 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.

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

  
Signature of Authorized Official

6/24/2022  
Date

Interim City Manager  
Title



# CPMP Non-State Grantee Certifications

Many elements of this document may be completed electronically, however a signature must be manually applied and the document must be submitted in paper form to the Field Office.

- ☐ This certification does not apply.  
☒ This certification is applicable.

## NON-STATE GOVERNMENT CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

**Drug Free Workplace** -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about –
  - a. The dangers of drug abuse in the workplace;
  - b. The grantee's policy of maintaining a drug-free workplace;
  - c. Any available drug counseling, rehabilitation, and employee assistance programs; and
  - d. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will –
  - a. Abide by the terms of the statement; and
  - b. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted –
  - a. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

**Anti-Lobbying** -- To the best of the jurisdiction's knowledge and belief:

No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

 6/13/22

Signature/Authorized Official *Asst. City Manager* Date

*William Weber, on behalf of*

John P. Curp

Name

Interim City Manager

Title

City Hall, 801 Plum Street

Address

Cincinnati, Ohio 45202

City/State/Zip

513 352 3241

Telephone Number



- ☐ **This certification does not apply.**  
☒ **This certification is applicable.**

### Specific CDBG Certifications

The Entitlement Community certifies that:

**Citizen Participation --** It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan --** Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan --** It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

**Use of Funds --** It has complied with the following criteria:

**Maximum Feasible Priority -** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);

**Overall Benefit -** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2020, 2021, 2022, (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;

**Special Assessments -** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force --** It has adopted and is enforcing:

A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

**Compliance With Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K and R, of title 24;

**Compliance with Laws** -- It will comply with applicable laws.



6/13/22

Signature/Authorized Official

Date

*William Weber, Asst. City Manager on behalf of*

John P. Curp

Name

Interim City Manager

Title

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Address

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City/State/Zip

513 352 3241

Telephone Number



- ☐ This certification does not apply.  
☒ This certification is applicable.

**OPTIONAL CERTIFICATION  
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities, which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.





Signature/Authorized Official

Date

*William Weber, Asst. City Manager, on behalf of*

John P. Curp

Name

Interim City Manager

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Telephone Number

- ☐ This certification does not apply.  
☒ This certification is applicable.

### Specific HOME Certifications

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

**Eligible Activities and Costs** -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

**Appropriate Financial Assistance** -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



6/13/2022

Signature/Authorized Official

Date

William Weber, Asst. City Manager on behalf of

John P. Curp

Name

Interim City Manager

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Telephone Number

- ☐ This certification does not apply.  
☒ This certification is applicable.

### HOPWA Certifications

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.



Signature/Authorized Official

*William Weber, Asst. City Manager*  
John P. Curp

Date

6/13/22

Name

Interim City Manager

Title

City Hall, 801 Plum Street

Address

Cincinnati, Ohio 45202

City/State/Zip

513 352 3241

Telephone Number

- ☐ **This certification does not apply.**  
☒ **This certification is applicable.**

### ESG Certifications

I, John P. Curp, Chief Executive Officer of City of Cincinnati, certify that the local government will ensure the provision of the matching supplemental funds required by the regulation at 24 *CFR* 576.51. I have attached to this certification a description of the sources and amounts of such supplemental funds.

I further certify that the local government will comply with:

1. The requirements of 24 *CFR* 576.53 concerning the continued use of buildings for which Emergency Shelter Grants are used for rehabilitation or conversion of buildings for use as emergency shelters for the homeless; or when funds are used solely for operating costs or essential services.
2. The building standards requirement of 24 *CFR* 576.55.
3. The requirements of 24 *CFR* 576.56, concerning assurances on services and other assistance to the homeless.
4. The requirements of 24 *CFR* 576.57, other appropriate provisions of 24 *CFR* Part 576, and other applicable federal laws concerning nondiscrimination and equal opportunity.
5. The requirements of 24 *CFR* 576.59(b) concerning the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
6. The requirement of 24 *CFR* 576.59 concerning minimizing the displacement of persons as a result of a project assisted with these funds.
7. The requirements of 24 *CFR* Part 24 concerning the Drug Free Workplace Act of 1988.
8. The requirements of 24 *CFR* 576.56(a) and 576.65(b) that grantees develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted with ESG funds and that the address or location of any family violence shelter project will not be made public, except with written authorization of the person or persons responsible for the operation of such shelter.
9. The requirement that recipients involve themselves, to the maximum extent practicable and where appropriate, homeless individuals and families in policymaking, renovating, maintaining, and operating facilities assisted under the ESG program, and in providing services for occupants of these facilities as provided by 24 *CFR* 76.56.
10. The requirements of 24 *CFR* 576.57(e) dealing with the provisions of, and regulations and procedures applicable with respect to the environmental review responsibilities under the National Environmental Policy Act of 1969 and related

authorities as specified in 24 CFR Part 58.

11. The requirements of 24 CFR 576.21(a)(4) providing that the funding of homeless prevention activities for families that have received eviction notices or notices of termination of utility services will meet the requirements that: (A) the inability of the family to make the required payments must be the result of a sudden reduction in income; (B) the assistance must be necessary to avoid eviction of the family or termination of the services to the family; (C) there must be a reasonable prospect that the family will be able to resume payments within a reasonable period of time; and (D) the assistance must not supplant funding for preexisting homeless prevention activities from any other source.
12. The new requirement of the McKinney-Vento Act (42 USC 11362) to develop and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. I further understand that state and local governments are primarily responsible for the care of these individuals, and that ESG funds are not to be used to assist such persons in place of state and local resources.
13. HUD's standards for participation in a local Homeless Management Information System (HMIS) and the collection and reporting of client-level information.

I further certify that the submission of a completed and approved Consolidated Plan with its certifications, which act as the application for an Emergency Shelter Grant, is authorized under state and/or local law, and that the local government possesses legal authority to carry out grant activities in accordance with the applicable laws and regulations of the U. S. Department of Housing and Urban Development.



6/13/22

Signature/Authorized Official

Date

Asst. City Manager on behalf of

John P. Curp

Name

Interim City Manager

Title

City Hall, 801 Plum Street

Address

Cincinnati, Ohio 45202

City/State/Zip

513 352 3241

Telephone Number

- ☐ This certification does not apply.
- ☒ This certification is applicable.

## APPENDIX TO CERTIFICATIONS

### Instructions Concerning Lobbying and Drug-Free Workplace Requirements

#### Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### Drug-Free Workplace Certification

- By signing and/or submitting this application or grant agreement, the grantee is providing the certification.

The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.

Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.

Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).

If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).

- The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant: Place of Performance (Street address, city, county, state, zip code) Check if there are workplaces on file that are not identified here. The certification with regard to the drug-free workplace is required by 24 CFR part 21.

Place Name	Street	City	County	State	Zip
City Hall	801 Plum Street	Cincinnati	Hamilton	OH	45202
Centennial Two	805 Central Avenue	Cincinnati	Hamilton	OH	45202
Cincinnati Health Department	3101 Burnet	Cincinnati	Hamilton	OH	45229
Cincinnati Health Department	3301 Beekman Street	Cincinnati	Hamilton	OH	45225

Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules: "Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15); "Conviction" means a finding of guilt (including a plea of *nolo contendere*) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes; "Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any

controlled substance; "Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including:

- a. All "direct charge" employees;
- b. all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and
- c. temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Note that by signing these certifications, certain documents must be completed, in use, and on file for verification. These documents include:

1. Analysis of Impediments to Fair Housing
2. Citizen Participation Plan
3. Anti-displacement and Relocation Plan



6/13/22

Signature/Authorized Official

Date

*William Weber, Asst. City Manager on behalf of*

John P. Curp

Name

Interim City Manager

Title

City Hall, 801 Plum Street

Address

Cincinnati, Ohio 45202

City/State/Zip

513 352 3241

Telephone Number

### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**3. Date Received:**

06/13/2022

**4. Applicant Identifier:**

City of Cincinnati

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:** City of Cincinnati

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

31-6000064

**\* c. Organizational DUNS:**

MALYY97YANE5

**d. Address:**

**\* Street1:** 801 Plum Street

**Street2:**

**\* City:** Cincinnati

**County/Parish:**

**\* State:** OH: Ohio

**Province:**

**\* Country:** USA: UNITED STATES

**\* Zip / Postal Code:** 45202-1927

**e. Organizational Unit:**

**Department Name:**

Office of the City Manager

**Division Name:**

Grant Administration

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

**\* First Name:**

Aisha

**Middle Name:**

**\* Last Name:** Tzillah

**Suffix:**

**Title:** Community Development Administrator

**Organizational Affiliation:**

City of Cincinnati Office of Grant Administration

**\* Telephone Number:** 513-352-4982

**Fax Number:** 513-352-6123

**\* Email:** aisha.tzillah@cincinnati-oh.gov



## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

US Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grant

### \* 12. Funding Opportunity Number:

B-22-MC-39-0003

\* Title:

Community Development Block Grant - entitlement

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

City of Cincinnati's Community Development Block Grant - entitlement

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="11,379,516.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="1,470,554.92"/>
* g. TOTAL	<input type="text" value="12,850,070.92"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

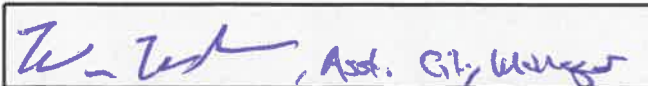
Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: 

\* Signature of Authorized Representative:

\* Date Signed:

### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**3. Date Received:**

06/13/2022

**4. Applicant Identifier:**

City of Cincinnati

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:** City of Cincinnati

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

31-6000064

**\* c. Organizational DUNS:**

MALYJ97YANE5

**d. Address:**

**\* Street1:** 801 Plum Street

**Street2:**

**\* City:** Cincinnati

**County/Parish:**

**\* State:** OH: Ohio

**Province:**

**\* Country:** USA: UNITED STATES

**\* Zip / Postal Code:** 45202-1962

**e. Organizational Unit:**

**Department Name:**

Office of the City Manager

**Division Name:**

Grant Administration

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

**\* First Name:**

Aisha

**Middle Name:**

**\* Last Name:** Tzillah

**Suffix:**

**Title:** Community Development Administrator

**Organizational Affiliation:**

City of Cincinnati Office of Grant Administration

**\* Telephone Number:** 513-352-4982

**Fax Number:** 513-352-6123

**\* Email:** aisha.tzillah@cincinnati-oh.gov

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

US Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program

### \* 12. Funding Opportunity Number:

M-22-MC-39-0213

\* Title:

HOME Investment Partnerships Program - entitlement

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

City of Cincinnati's HOME Investment Partnerships Program - entitlement

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="3,029,588.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="211,042.76"/>
* g. TOTAL	<input type="text" value="3,240,630.76"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

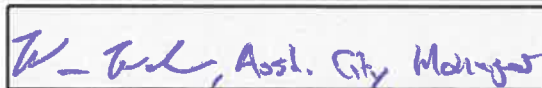
Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: 

\* Signature of Authorized Representative:



\* Date Signed:

### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**3. Date Received:**

06/13/2022

**4. Applicant Identifier:**

City of Cincinnati

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:** City of Cincinnati

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

31-6000064

**\* c. Organizational DUNS:**

MALYJ97YANE5

**d. Address:**

\* Street1: 801 Plum Street

Street2:

\* City: Cincinnati

County/Parish:

\* State:

OH: Ohio

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code: 45202-1962

**e. Organizational Unit:**

**Department Name:**

Office of the City Manager

**Division Name:**

Grant Administration

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:

\* First Name:

Aisha

Middle Name:

\* Last Name:

Tzillah

Suffix:

Title: Community Development Administrator

**Organizational Affiliation:**

City of Cincinnati Office of Grants Administration

\* Telephone Number: 513-352-4982

Fax Number: 513-352-6123

\* Email: aisha.tzillah@cincinnati-oh.gov

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

US Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.241

CFDA Title:

Housing Opportunities for Persons With HIV/AIDS

### \* 12. Funding Opportunity Number:

OH-H22-F001

\* Title:

Housing Opportunities for Persons With HIV/AIDS - entitlement

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

City of Cincinnati's Housing Opportunities for Persons With HIV/AIDS - entitlement

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

1

\* b. Program/Project

1

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

01/21/2022

\* b. End Date:

12/31/2025

**18. Estimated Funding (\$):**

* a. Federal	1,696,715.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	1,696,715.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

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☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

\* First Name:

John

Middle Name:

P.

\* Last Name:

Curp

Suffix:

\* Title:

Interim City Manager

\* Telephone Number:

513-352-3241

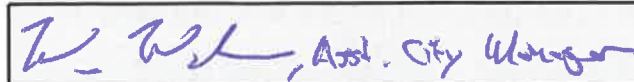
Fax Number:

513-352-6284

\* Email:

john.curp@cincinnati-oh.gov

\* Signature of Authorized Representative:



\* Date Signed:

6/17/22



### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

06/13/2022

**4. Applicant Identifier:**

City of Cincinnati

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:** City of Cincinnati

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

31-600064

**\* c. Organizational DUNS:**

MALYJ97YANE5

**d. Address:**

\* Street1: 801 Plum Street

Street2:

\* City: Cincinnati

County/Parish:

\* State:

OH: Ohio

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code: 45202-1962

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**Department Name:**

Office of the City Manager

**Division Name:**

Grant Administration

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:

\* First Name:

Aisha

Middle Name:

\* Last Name: Tzillah

Suffix:

Title: Community Development Administrator

**Organizational Affiliation:**

City of Cincinnati Office of Grant Administration

\* Telephone Number: 513-352-4982

Fax Number: 513-352-6123

\* Email: aisha.tzillah@cincinnati-oh.gov

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

US Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

Emergency Solutions Grant

### \* 12. Funding Opportunity Number:

E-22-MC-39-0003

\* Title:

Emergency Solutions Grant - entitlement

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

City of Cincinnati's Emergency Solutions Grant - entitlement

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

1

\* b. Program/Project

1

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

01/21/2022

\* b. End Date:

12/31/2024

**18. Estimated Funding (\$):**

* a. Federal	989,809.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	989,809.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

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☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

\* First Name:

John

Middle Name:

P.

\* Last Name:

Curp

Suffix:

\* Title:

Interim City Manager

\* Telephone Number:

513-352-3241

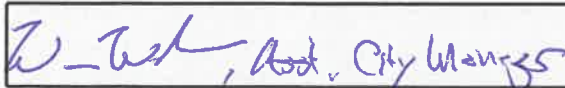
Fax Number:

513-352-6284

\* Email:

john.curp@cincinnati-oh.gov

\* Signature of Authorized Representative:



\* Date Signed:

6/13/22



June 2, 2022

**To:** Mayor and Members of City Council

**From:** John P. Curp, Interim City Manager

202201311

**Subject:** Emergency Ordinance – 2022 CDBG Entitlement Grant Award

Attached is an Emergency Ordinance captioned:

**AUTHORIZING** the City Manager to accept and appropriate a grant of \$11,379,516 from the U.S. Department of Housing and Urban Development to various Community Development Block Grant Fund 304 project accounts in accordance with Section 1 of the attached Appropriation Schedule for the purpose of funding various projects and operating allocations for the Community Development Block Grant Program for Calendar Year 2022; **ANNOUNCING** the City's intention to use said funds for various projects and operating allocations for the Community Development Block Grant Program for Calendar Year 2022 according to Section 1 of the attached Appropriation Schedule and to file the 2022 Annual Action Plan; **AUTHORIZING** the return to source of the sum of \$2,500,000 from various Community Development Block Grant Fund 304 project accounts to the unappropriated surplus of Community Development Block Grant Fund 304 for the purpose of realigning available grant resources in accordance with Section 2 of the attached Appropriation Schedule; and **AUTHORIZING** the appropriation of \$2,500,000 from the unappropriated surplus of Community Development Block Grant Fund 304 project accounts for the purpose of realigning resources with program needs in accordance with Section 3 of the attached Appropriation Schedule.

Approval of this Emergency Ordinance will authorize the City Manager to accept and appropriate a grant of \$11,379,516 from the U.S. Department of Housing and Urban Development (HUD) to various Community Development Block Grant Fund 304 project accounts in accordance with Section 1 of the attached Appropriation Schedule. Additionally, this Emergency Ordinance will announce the City's intention to use said funds for various projects and operating allocations for the Community Development Block Grant Program for Calendar Year 2022 and to file the 2022 Annual Action Plan according to Section 1 of the attached Appropriation Schedule.

Approval of this Emergency Ordinance will authorize the return to source of \$2,500,000 from various existing Community Development Block Grant Fund 304 project accounts for the purpose of realigning grant resources in accordance with Section 2 of the attached Appropriation Schedule.

Finally, approval of this Emergency Ordinance will authorize the appropriation of \$2,500,000 from the unappropriated surplus of Community Development Block Grant Fund 304 to various Community Development Block Grant Fund 304 projects accounts

for the purpose of aligning resources with program needs in accordance with Section 3 of the attached Appropriation Schedule.

Accepting and appropriating funds from the CDBG Program is in accordance with the "Live" strategy to "[s]upport and stabilize our neighborhoods" as described on pages 160-163 and the "Compete" initiative to "[b]e the pivotal economic force in the region" as described on pages 101-102 of Plan Cincinnati (2012).

The reason for the emergency is the immediate need to provide funding for the continuation of vital City programs and to comply with the HUD 2022 Annual Action Plan sixty-day submission deadline.

The Administration recommends passage of this Emergency Ordinance.

cc: Andrew M. Dudas, Budget Director  
Karen Alder, Finance Director



Attachment



EMERGENCY

City of Cincinnati

CFG

AWG/EDSW

An Ordinance No. 153

-2022

**AUTHORIZING** the City Manager to accept and appropriate a grant of \$11,379,516 from the U.S. Department of Housing and Urban Development to various Community Development Block Grant Fund 304 project accounts in accordance with Section 1 of the attached Appropriation Schedule for the purpose of funding various projects and operating allocations for the Community Development Block Grant Program for Calendar Year 2022; **ANNOUNCING** the City's intention to use said funds for various projects and operating allocations for the Community Development Block Grant Program for Calendar Year 2022 according to Section 1 of the attached Appropriation Schedule and to file the 2022 Annual Action Plan; **AUTHORIZING** the return to source of the sum of \$2,500,000 from various Community Development Block Grant Fund 304 project accounts to the unappropriated surplus of Community Development Block Grant Fund 304 for the purpose of realigning available grant resources in accordance with Section 2 of the attached Appropriation Schedule; and **AUTHORIZING** the appropriation of \$2,500,000 from the unappropriated surplus of Community Development Block Grant Fund 304 project accounts for the purpose of realigning resources with program needs in accordance with Section 3 of the attached Appropriation Schedule.

WHEREAS, the Community Development Block Grant ("CDBG") Program provides annual grants to local communities to address a wide range of unique community development needs; and

WHEREAS, the U.S. Department of Housing and Urban Development ("HUD") announced the grant allocation of \$11,379,516 to the City for the 2022 CDBG program per Assistance Listing Number (ALN) 14.218 via Award B-22-MC-39-003 on May 16, 2022; and

WHEREAS, the CDBG grant is one of four HUD entitlement grants awarded to the City for Calendar Year 2022 that when combined create the 2022 Annual Action Plan, which must be submitted to HUD within sixty days of the award announcement; and

WHEREAS, accepting and appropriating funds from the CDBG Program is in accordance with the "Live" strategy to "[s]upport and stabilize our neighborhoods" as described on pages 160-163 and the "Compete" initiative to "[b]e the pivotal economic force in the region" as described on pages 101-102 of Plan Cincinnati (2012); now, therefore,

BE IT ORDAINED by the Council of the City of Cincinnati, State of Ohio:

Section 1. That the City Manager is hereby authorized to accept from the U.S. Department of Housing and Urban Development, and appropriate the sum of \$11,379,516 to various

Community Development Block Grant Fund 304 project accounts in accordance with Section 1 of the attached Appropriation Schedule, for the purpose of funding various projects and operating allocations for the Community Development Block Grant Program for Calendar Year 2022, and the City Manager is further authorized to file the 2022 Annual Action Plan.

Section 2. That Council hereby announces the intent of the City of Cincinnati to use said sum for various projects and operating allocations for the Community Development Block Grant Program for Calendar Year 2022 according to Section 1 of the attached Appropriation Schedule and to file the 2022 Annual Action Plan.

Section 3. That the City Council hereby authorizes the return to source of the sum of \$2,500,000 from various existing Community Development Block Grant Fund 304 project accounts to the unappropriated surplus of Community Development Block Grant Fund 304 for the purpose of realigning grant resources in accordance with Section 2 of the attached Appropriation Schedule.

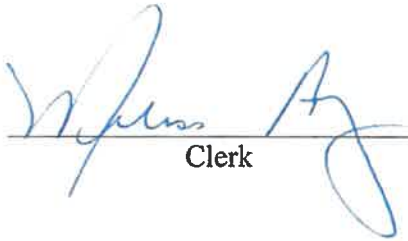
Section 4. That Council hereby authorizes the appropriation of \$2,500,000 from the unappropriated surplus of Community Development Block Grant Fund 304 to various Community Development Block Grant Fund 304 project accounts for the purpose of aligning resources with program needs in accordance with Section 3 of the attached Appropriation Schedule.

Section 5. That the proper City officials are authorized to do all things necessary and proper to implement the terms of Sections 1 through 4 hereof.

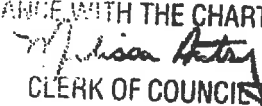
Section 6. That this ordinance shall be an emergency measure necessary for the preservation of the public peace, health, safety, and general welfare and shall, subject to the terms of Article II, Section 6 of the Charter, be effective immediately. The reason for the emergency is

the immediate need to provide funding for the continuation of vital City programs and to comply with the HUD 2022 Annual Action Plan sixty-day submission deadline.

Passed: June 8, 2022

Attest:   
Clerk

  
Aftab Poreva, Mayor

I HEREBY CERTIFY THAT ORDINANCE NO 153-2022  
WAS PUBLISHED IN THE CITY BULLETIN  
IN ACCORDANCE WITH THE CHARTER ON 10-21-2022  
  
CLERK OF COUNCIL



# **APPROPRIATION SCHEDULE**

## **COMMUNITY DEVELOPMENT BLOCK GRANT APPROPRIATION SCHEDULE**

## **Section 1**

Grant Program	Fund	Agency	Project Account No.	Project Title	Amount
CDBG	304	162	30422212	Blueprint For Success '22	\$50,000.00
CDBG	304	164	30422611	Commercial and Industrial Redevelopment '22	\$500,000.00
CDBG	304	161	30422142	Concentrated Code Enforcement '22	\$585,000.00
CDBG	304	162	30422123	Emergency Mortgage Assistance '22	\$215,000.00
CDBG	304	162	30422122	Fair Housing Services '22	\$170,000.00
CDBG	304	161	30422141	Family Re-Housing Assistance	\$130,000.00
CDBG	304	161	30422802	Findlay Market Operating Support '22	\$75,000.00
CDBG	304	162	30422124	Hand Up Initiative '22	\$1,100,000.00
CDBG	304	161	30422136	Hazard Abatement Program '22	\$750,000.00
CDBG	304	161	30422137	Historic Stabilization of Structures '22	\$200,000.00
CDBG	304	161	30422904	Homeowner Assistance Repairs and Building Order Remission '22	\$250,000.00
CDBG	304	162	30422015	Housing Repair Services '22	\$1,988,613.00
CDBG	304	164	30422221	NBD Improvement Program '22	\$800,000.00
CDBG	304	162	30422244	Operating Support for CDCs '22	\$300,000.00
CDBG	304	162	30422777	Project Lift '22	\$200,000.00
CDBG	304	164	30422201	Small Business Services '22	\$100,000.00
CDBG	304	162	30422431	Strategic Housing Initiatives Program '22	\$350,000.00
CDBG	304	162	30422121	Tenant Representation '22	\$255,000.00
CDBG	304	162	30422433	Vacant Lot Reutilization '22	\$85,000.00
CDBG	304	161	30422621	Youth and Young Adult Employment Program '22	\$500,000.00
CDBG	304	161	30422108	Section 108 Debt Service	\$400,000.00
CDBG	304	161	30422000	Administration - CDBG '22	\$1,675,903.00
CDBG	304	161	30422171	Administration - Planning Dept '22	\$600,000.00

**TOTAL \$11,379,516.00**

## **DECREASE OF EXISTING COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM RECONCILIATION SCHEDULE**

## **Section 2**

Grant Program	Fund	Agency	Project Account No.	Project Title	Original Authorization	Amount to be Decreased	Revised Authorization
CDBG	304	164	62201	Small Business Services '16	\$205,000.00	\$59,922.15	\$145,077.85
CDBG	304	162	304170666	West Price Hill Area Development Program	\$1,899,302.00	\$27,561.78	\$1,871,740.22
CDBG	304	162	30418124	Hand Up Initiative '18	\$1,256,000.00	\$83,418.95	\$1,172,581.05
CDBG	304	162	30419777	Project Lift '19	\$600,000.00	\$600,000.00	\$0.00
CDBG	304	162	30420777	Project Lift '20	\$600,000.00	\$304,669.12	\$295,330.88
CDBG	304	162	30421124	Hand Up Initiative '21	\$1,267,214.00	\$1,267,214.00	\$0.00
CDBG	304	164	30421201	Small Business Services '21	\$157,214.00	\$157,214.00	\$0.00

**TOTAL \$5,984,730.00 \$2,500,000.00 \$3,484,730.00**

## **INCREASE OF EXISTING COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM RECONCILIATION SCHEDULE**

## **Section 3**

Grant Program	Fund	Agency	Project Account No.	Project Title	Original Authorization	Amount to be Increased	Revised Authorization
CDBG	304	162	61244	Operating Support for CDCs '16	\$417,603.00	\$59,922.15	\$477,525.15
CDBG	304	162	304171244	Operating Support for CDCs '17	\$266,000.00	\$27,561.78	\$341,909.81
CDBG	304	162	30418244	Operating Support for CDCs '18	\$267,000.00	\$83,418.95	\$350,418.95
CDBG	304	162	30419244	Operating Support for CDCs '19	\$380,000.00	\$600,000.00	\$980,000.00
CDBG	304	162	30420244	Operating Support for CDCs '20	\$300,000.00	\$304,669.12	\$556,321.09
CDBG	304	162	30421244	Operating Support for CDCs '21	\$307,214.00	\$1,424,428.00	\$1,731,642.00

**TOTAL \$1,937,817.00 \$2,500,000.00 \$4,437,817.00**

June 2, 2022

To: Mayor and Members of City Council

From: John P. Curp, Interim City Manager *JP* 202201307

Subject: Emergency Ordinance – 2022 HOME Entitlement Grant Award

Attached is an Emergency Ordinance captioned:

**AUTHORIZING** the City Manager to accept and appropriate the sum of \$3,029,588 from the United States Department of Housing and Urban Development to various Home Investment Trust Fund 411 project accounts in accordance with Section 1 of the attached Appropriation Schedule; **AUTHORIZING** the appropriation of the sum of \$211,042.76 in program income to various Home Investment Trust Fund 411 project accounts for the purpose of providing funding for the continuation of vital City programs in accordance with Section 1 of the attached Appropriation Schedule; **ANNOUNCING** the City's intention to use said sum for various projects and operating allocations for the HOME Investment Partnerships Grant Program for Calendar Year 2022 according to Section 1 of the attached Appropriation Schedule and to file the 2022 Annual Action Plan; **AUTHORIZING** the return to source of the sum of \$209,718.42 from various existing Home Investment Trust Fund 411 project accounts to the unappropriated surplus of Home Investment Trust Fund 411 for the purpose of realigning available grant resources in accordance with Section 2 of the attached Appropriation Schedule; and **AUTHORIZING** the appropriation of the sum of \$200,877.42 from the unappropriated surplus of Home Investment Trust Fund 411 to various Home Investment Trust Fund 411 project accounts for the purpose of aligning resources with program needs in accordance with Section 3 of the attached Appropriation Schedule.

Approval of this Emergency Ordinance will authorize the acceptance and appropriation of the sum of \$3,029,588 from the U.S. Department of Housing and Urban Development to various Home Investment Trust Fund 411 project accounts in accordance with Section 1 of the attached Appropriation Schedule. This Emergency Ordinance further authorizes the appropriation of the sum of \$211,042.76 in program income to various Home Investment Trust Fund 411 project accounts for the purpose of providing funding for the continuation of vital City programs in accordance with Section 1 of the attached Appropriation Schedule. This Emergency Ordinance will also announce the City's intention to use said sum for various projects and operating allocations for the HOME Investment Partnerships Grant Program for Calendar Year 2022 and filing the 2022 Annual Action Plan according to Section 1 of the attached Appropriation Schedule.

Approval of this Emergency Ordinance will authorize the return to source the sum of \$209,718.42 from various existing Home Investment Trust Fund 411 project accounts to reflect available grant resources in accordance with Section 2 of the attached Appropriation Schedule. Finally, the Emergency Ordinance will authorize the appropriation of the sum of \$200,877.42 from the unappropriated surplus of Home Investment Trust Fund 411 to various Home Investment Trust Fund 411 project accounts for the purpose of aligning resources with program needs in accordance with Section 3 of the attached Appropriation Schedule.

Accepting and appropriating grant funds from the HOME program is in accordance with the "Live" strategy to "[s]upport and stabilize our neighborhoods" as described on pages 160-163 of Plan Cincinnati (2012).

The reason for the emergency is the immediate need to provide funding for the continuation of vital City programs and to comply with the HUD 2022 Annual Action Plan sixty-day submission deadline.

The Administration recommends passage of this Emergency Ordinance.

cc: Andrew M. Dudas, Budget Director  
Karen Alder, Finance Director



Attachment



EMERGENCY

City of Cincinnati

An Ordinance No. 150

CFG

AWG/EDSW

-2022

**AUTHORIZING** the City Manager to accept and appropriate the sum of \$3,029,588 from the United States Department of Housing and Urban Development to various Home Investment Trust Fund 411 project accounts in accordance with Section 1 of the attached Appropriation Schedule; **AUTHORIZING** the appropriation of the sum of \$211,042.76 in program income to various Home Investment Trust Fund 411 project accounts for the purpose of providing funding for the continuation of vital City programs in accordance with Section 1 of the attached Appropriation Schedule; **ANNOUNCING** the City's intention to use said sum for various projects and operating allocations for the HOME Investment Partnerships Grant Program for Calendar Year 2022 according to Section 1 of the attached Appropriation Schedule and to file the 2022 Annual Action Plan; **AUTHORIZING** the return to source of the sum of \$209,718.42 from various existing Home Investment Trust Fund 411 project accounts to the unappropriated surplus of Home Investment Trust Fund 411 for the purpose of realigning available grant resources in accordance with Section 2 of the attached Appropriation Schedule; and **AUTHORIZING** the appropriation of the sum of \$200,877.42 from the unappropriated surplus of Home Investment Trust Fund 411 to various Home Investment Trust Fund 411 project accounts for the purpose of aligning resources with program needs in accordance with Section 3 of the attached Appropriation Schedule.

WHEREAS, through the HOME Investment Partnerships Program ("HOME"), the United States Department of Housing and Urban Development ("HUD") provides annual grants to local communities for projects that include buying, building, and rehabilitating affordable housing for rent or ownership, as well as projects providing down payment assistance; and

WHEREAS, HUD announced the allocation of \$3,209,588 to the City for the 2022 HOME program per Assistance Listing Number (ALN) 14.239 via Award No. M-22-MC-39-0213 on May 13, 2022; and

WHEREAS, program income received in Calendar Year 2021 in the amount of \$211,042.76 must now be appropriated to 2022 HOME project accounts; and

WHEREAS, prior year HOME project account appropriations must now be adjusted to align with current resources and program needs; and

WHEREAS, the HOME program grant is one of four HUD entitlement grants awarded to the City for Calendar Year 2022 that when combined create the 2022 Annual Action Plan, which must be submitted to HUD within sixty days of the award announcement; and

WHEREAS, accepting and appropriating grant funds from the HOME program is in accordance with the "Live" strategy to "[s]upport and stabilize our neighborhoods" as described on pages 160-163 of Plan Cincinnati (2012); now, therefore,

BE IT ORDAINED by the Council of the City of Cincinnati, State of Ohio:

Section 1. That the City Manager is hereby authorized to accept from the U.S. Department of Housing and Urban Development and appropriate the sum of \$3,029,588 to various Home Investment Trust Fund 411 project accounts in accordance with Section 1 of the attached Appropriation Schedule for the purpose of funding various projects and operating allocations for the HOME Investment Partnerships Grant Program for Calendar Year 2022, and the City Manager is further authorized to file the 2022 Annual Action Plan.

Section 2. That Council hereby authorizes the appropriation of \$211,042.76 in program income to various Home Investment Trust Fund 411 project accounts for the purpose of providing funding for continuation of vital City programs in accordance with Section 1 of the attached Appropriation Schedule.

Section 3. That Council hereby announces the intent of the City of Cincinnati to use said sum for various projects and operating allocations for the Home Investment Partnerships Program for Calendar Year 2022 according to Section 1 of the attached Appropriation Schedule and to file the 2022 Annual Action Plan.

Section 4. That Council hereby authorizes the return to source of the sum of \$209,718.42 from various existing Home Investment Trust Fund 411 project accounts to the unappropriated surplus of Home Investment Trust Fund 411 for the purpose of realigning grant resources in accordance with Section 2 of the attached Appropriation Schedule.

Section 5. That Council hereby authorizes the appropriation of \$200,877.42 from the unappropriated surplus of Home Investment Trust Fund 411 to various Home Investment Trust Fund 411 project accounts for the purpose of aligning resources with program needs in accordance with Section 3 of the attached Appropriation Schedule.

Section 6. That the proper City officials are authorized to do all things necessary and proper to implement the terms of Sections 1 through 5 hereof.

Section 7. That this ordinance shall be an emergency measure necessary for the preservation of the public peace, health, safety, and general welfare and shall, subject to the terms of Article II, Section 6 of the Charter, be effective immediately. The reason for the emergency is the immediate need to provide funding for the continuation of vital City programs and to comply with the HUD 2022 Annual Action Plan sixty-day submission deadline.

Passed: June 8, 2022

Attest: [Signature]  
Clerk

[Signature]  
Aftab Pureval Mayor

I HEREBY CERTIFY THAT ORDINANCE NO 1501022  
WAS PUBLISHED IN THE CITY BULLETIN  
IN ACCORDANCE WITH THE CHARTER ON 6-21-2022  
[Signature]  
CLERK OF COUNCIL

# **RECONCILIATION AND APPROPRIATION SCHEDULE**

## **HOME INVESTMENT PARTNERSHIPS PROGRAM APPROPRIATION SCHEDULE**

## **Section 1**

Grant Program	Fund	Agency	Project Account No.	Project Title	Amount
HOME	411	162	4112202	CHDO Development Projects '22	\$454,439.00
HOME	411	162	4112204	Operating Support for CHDOs '22	\$151,479.00
HOME	411	162	4112206	Strategic Housing Initiatives Program '22	\$2,310,649.76
HOME	411	162	4112201	HOME Administration '22	\$324,063.00

**TOTAL \$3,240,630.76**

## **DECREASE OF EXISTING HOME INVESTMENT PARTNERSHIPS PROGRAM APPROPRIATION SCHEDULE**

## **Section 2**

Grant Program	Fund	Agency	Project Account No.	Project Title	Original Authorization	Amount to be Decreased	Revised Authorization
HOME	411	162	09010	Strategic Housing Initiatives Program '10	\$1,212,621.55	\$8,841.00	\$1,203,780.55
HOME	411	162	4111804	Operating Support for CHDO '18	\$220,948.00	\$877.42	\$220,070.58
HOME	411	162	4112105	Single Family Homeownership '21	\$200,000.00	\$200,000.00	\$0.00

**TOTAL \$1,633,569.55    \$209,718.42    \$1,423,851.13**

## **INCREASE OF EXISTING HOME INVESTMENT PARTNERSHIPS PROGRAM APPROPRIATION SCHEDULE**

## **Section 3**

Grant Program	Fund	Agency	Project Account No.	Project Title	Original Authorization	Amount to be Increased	Revised Authorization
HOME	411	162	4111806	Strategic Housing Initiatives Program '18	\$3,435,171.62	\$877.42	\$3,436,049.04
HOME	411	162	4112106	Strategic Housing Initiatives Program '21	\$1,719,844.05	\$200,000.00	\$1,919,844.05

**TOTAL \$5,155,015.67    \$200,877.42    \$5,355,893.09**

June 2, 2022

**To:** Mayor and Members of City Council

**From:** John P. Curp, Interim City Manager

202201309

**Subject:** Emergency Ordinance – 2022 ESG Entitlement Grant Award

Attached is an Emergency Ordinance captioned:

**AUTHORIZING** the City Manager to accept and appropriate the sum of \$989,809 from the U.S. Department of Housing and Urban Development to Emergency Shelter Grant Fund 445 in accordance with the attached Appropriation Schedule; and **ANNOUNCING** the City's intention to use the funds for various projects and operating allocations for the Emergency Solutions Grant Program for Calendar Year 2022 and to file the 2022 Annual Action Plan.

Approval of this Emergency Ordinance will authorize the acceptance and appropriation of the sum of \$989,809 from the U.S. Department of Housing and Urban Development ("HUD") to Emergency Shelter Grant Fund 445, in accordance with the attached Appropriation Schedule. Approval of this Emergency Ordinance will also announce the City's intention to use said sum for various projects and operating allocations for the Emergency Solutions Grant Program for Calendar Year 2022 and filing of the 2022 Annual Action Plan, in accordance with the attached Appropriation Schedule.

Accepting and appropriating funds from the ESG Program is in accordance with the "Live" strategy to "[s]upport and stabilize our neighborhoods" as described on pages 160-163 of Plan Cincinnati (2012).

The reason for the emergency is the immediate need for the provision of funding for the continuation of vital City programs, and to comply with the HUD 2022 Annual Action Plan sixty-day submission deadline.

The Administration recommends passage of this Emergency Ordinance.

cc: Andrew M. Dudas, Budget Director  
Karen Alder, Finance Director

Attachment







EMERGENCY

City of Cincinnati

IMD  
AWG/ESW

An Ordinance No. 151

-2022

**AUTHORIZING** the City Manager to accept and appropriate the sum of \$989,809 from the U.S. Department of Housing and Urban Development to Emergency Shelter Grant Fund 445 in accordance with the attached Appropriation Schedule; and **ANNOUNCING** the City's intention to use the funds for various projects and operating allocations for the Emergency Solutions Grant Program for Calendar Year 2022 and to file the 2022 Annual Action Plan.

WHEREAS, the U.S. Department of Housing and Urban Development's ("HUD") Emergency Solutions Grant ("ESG") Program provides annual grants to local communities for projects that engage homeless persons living on the street, improve the number and quality of shelters, help operation shelters, provide essential services to shelter residents, rapidly re-house homeless persons, and prevent persons from becoming homeless; and

WHEREAS, HUD announced the grant allocation for the ESG program per Assistance Living Number (ALN) 14.231 via Award E-22-MC-39-0003 on May 13, 2022; and

WHEREAS, the ESG grant is one of four HUD entitlement grants awarded to the City for Calendar Year 2022 that, when combined, create the 2022 Annual Action Plan, which must be submitted to HUD within sixty days of the award announcement; and

WHEREAS, accepting and appropriating funds from the ESG Program is in accordance with the "Live" strategy to "[s]upport and stabilize our neighborhoods" as described on pages 160-163 of Plan Cincinnati (2012); now, therefore

BE IT ORDAINED by the Council of the City of Cincinnati, State of Ohio:

Section 1. That the City Manager is authorized to accept from the U.S. Department of Housing and Urban Development and appropriate the sum of \$989,809 from the U.S. Department of Housing and Urban Development ("HUD") into Emergency Shelter Grant Fund 445 in accordance with the attached Appropriation Schedule for the purpose of funding various projects and operating allocations for the Emergency Solutions Grant Program for Calendar Year 2022, and the City Manager is further authorized to file the 2022 Annual Action Plan.

Section 2. That Council hereby announces the intent of the City of Cincinnati to use said sum for various projects and operating allocations for the Emergency Solutions Grant Program for

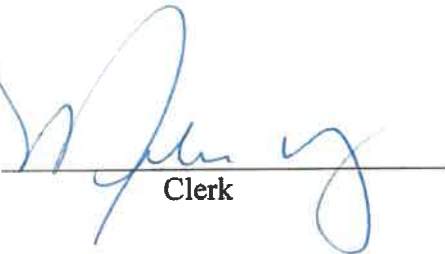
Calendar Year 2022 according to the attached Appropriation Schedule and to file the 2022 Annual Action Plan.

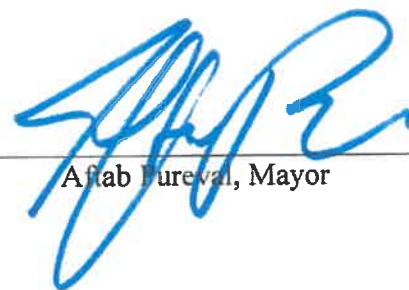
Section 3. That the proper City officials are hereby authorized to do all things necessary and proper to implement the provisions of Sections 1 and 2 herein.

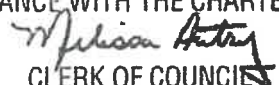
Section 4. That this ordinance shall be an emergency measure necessary for the preservation of the public peace, health, safety, and general welfare and shall, subject to the terms of Article II, Section 6 of the Charter, be effective immediately, and that the reason for the emergency is the immediate need for the provision of funding for the continuation of vital City programs, and to comply with the HUD 2022 Annual Action Plan sixty-day submission deadline.

Passed: June 8, 2022

Attest:

  
Clerk

  
Aftab Purreval, Mayor

I HEREBY CERTIFY THAT ORDINANCE NO 157 2022  
WAS PUBLISHED IN THE CITY BULLETIN  
IN ACCORDANCE WITH THE CHARTER ON 6-21 2022  
  
CLERK OF COUNCIL

## APPROPRIATION SCHEDULE

### EMERGENCY SOLUTIONS GRANT APPROPRIATION SCHEDULE

Grant Program	Fund	Agency	Project Account No.	Project Title	Amount
ESG	445	162	4452221	Homeless Shelters and Housing '22	\$593,885.00
ESG	445	162	4452215	Rapid Re-Housing '22	\$321,689.00
ESG	445	162	4452223	ESG Administration '22	\$74,235.00
TOTAL					\$989,809.00

June 2, 2022

**To:** Mayor and Members of City Council

**From:** John P. Curp, Interim City Manager

202201310

**Subject:** Emergency Ordinance – 2022 HOPWA Entitlement Grant Award

Attached is an Emergency Ordinance captioned:

**AUTHORIZING** the City Manager to accept and appropriate the sum of \$1,696,715 from the U.S. Department of Housing and Urban Development to Housing Opportunities for Persons with AIDS Fund 465; and **ANNOUNCING** the City's intention to use said sum for various projects and operating allocations for the Housing Opportunities for Persons with HIV/AIDS Grant Program for Calendar Year 2022, in accordance with the attached Appropriation Schedule, and to file the 2022 Annual Action Plan.

Approval of this Emergency Ordinance will authorize the acceptance and appropriation of the sum of \$1,696,715 from the United States Department of Housing and Urban Development to Housing Opportunities for Persons with HIV/AIDS Fund 465. Approval of this Emergency Ordinance will also announce the City's intention to use said sum for various projects and operating allocations for the Housing Opportunities for Persons with HIV/AIDS Grant Program for Calendar Year 2022 and filing the 2022 Annual Action Plan, in accordance with the attached Appropriation Schedule.

Accepting and appropriating funds from the HOPWA Program is in accordance with the "Live" strategy to "Support and stabilize our neighborhoods" as described on pages 160-163 of Plan Cincinnati (2012).

The reason for the emergency is the immediate need to provide funding for the continuation of vital City programs and to comply with the HUD 2022 Annual Action Plan sixty-day submission deadline.

The Administration recommends passage of this Emergency Ordinance.

cc: Andrew M. Dudas, Budget Director  
Karen Alder, Finance Director



Attachment



EMERGENCY

City of Cincinnati

An Ordinance No. 152

KKF

AWG/EDSW

- 2022

**AUTHORIZING** the City Manager to accept and appropriate the sum of \$1,696,715 from the U.S. Department of Housing and Urban Development to Housing Opportunities for Persons with AIDS Fund 465; and **ANNOUNCING** the City's intention to use said sum for various projects and operating allocations for the Housing Opportunities for Persons with HIV/AIDS Grant Program for Calendar Year 2022, in accordance with the attached Appropriation Schedule, and to file the 2022 Annual Action Plan.

WHEREAS, through the Housing Opportunities for Persons with HIV/AIDS ("HOPWA") Program, the U.S. Department of Housing and Urban Development ("HUD") provides grants to local communities for projects that benefit low-income persons living with HIV/AIDS and their families; and

WHEREAS, HUD announced the allocations for the HOPWA program per Assistance Living Number (ALN) 14.241 via Award No. OH-H22-F001 on May 13, 2022; and

WHEREAS, the HOPWA grant is one of four entitlement HUD grants awarded to the City for Calendar Year 2022 that when combined create the 2022 Annual Action Plan, which must be submitted to HUD within sixty days of the award announcement; and

WHEREAS, accepting and appropriating funds from the HOPWA Grant Program is in accordance with the "Live" strategy to "[s]upport and stabilize our neighborhoods," as described on pages 160-163 of Plan Cincinnati (2012); now, therefore,

BE IT ORDAINED by the Council of the City of Cincinnati, State of Ohio:

Section 1. That the City Manager is hereby authorized to accept from the U.S. Department of Housing and Urban Development and appropriate the sum of \$1,696,715 to Housing Opportunities for Persons with AIDS Fund 465 in accordance with the attached Appropriation Schedule for the purpose of funding various projects and operating allocations for the Housing Opportunities for Persons with HIV/AIDS Grant Program for Calendar Year 2022, and the City Manager is further authorized to file the 2022 Annual Action Plan.


Section 2. That Council hereby announces the intent of the City of Cincinnati to use said sum for various projects and operating allocations for the Housing Opportunities for Persons with HIV/AIDS Grant Program for Calendar Year 2022 according to the attached Appropriation Schedule and to file the 2022 Annual Action Plan.

Section 3. That the proper City officials are authorized to do all things necessary and proper to implement the terms of Sections 1 and 2 hereof.

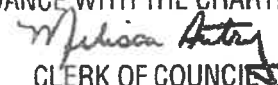
Section 4. That this ordinance shall be an emergency measure necessary for the preservation of the public peace, health, safety, and general welfare and shall, subject to the terms of Article II, Section 6 of the Charter, be effective immediately. The reason for the emergency is the immediate need to provide funding for the continuation of vital City programs and to comply with the HUD 2022 Annual Action Plan sixty-day submission deadline.

Passed: June 8, 2022

Attest:

  
Clerk

  
Aftab Pureval, Mayor

I HEREBY CERTIFY THAT ORDINANCE NO 152-2022  
WAS PUBLISHED IN THE CITY BULLETIN  
IN ACCORDANCE WITH THE CHARTER ON 6-24-2022  
  
CLERK OF COUNCIL

## APPROPRIATION SCHEDULE

### HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS GRANT APPROPRIATION SCHEDULE

Grant Program	Fund	Agency	Project Account No.	Project Title	Amount
HOPWA	465	162	4652207	HOPWA Administration '22	\$50,901.00
HOPWA	465	162	4652203	HOPWA Services and Support '22	\$1,156,347.00
HOPWA	465	162	4652204	HOPWA Services and Support '22 - '23	\$489,467.00

**TOTAL \$1,696,715.00**



# City of Cincinnati

801 Plum Street  
Cincinnati, OH 45202

## Agenda - Final-revised

### Budget and Finance Committee

*Chairperson, Greg Landsman  
Vice Chairperson, Reggie Harris  
Councilmember Jeff Cramerding  
Councilmember Mark Jeffreys  
Councilmember Scotty Johnson  
Vice Mayor Jan-Michele Kearney  
Councilmember Liz Keating  
Councilmember Meeka Owens  
President Pro Tem Victoria Parks*

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Monday, June 6, 2022

1:00 PM

Council Chambers, Room 300

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ROLL CALL

### AGENDA

1. [202201289](#) COMMUNICATION, submitted by Councilmember Landsman from Closing the Health Gap regarding support for Closing the Health Gap. (ADDITIONAL CARDS ON FILE IN THE CLERK'S OFFICE).  
  
**Sponsors:** Landsman  
**Attachments:** [Closing the Health Gap Cards 5-31-2022](#)
  
2. [202201260](#) REPORT, dated 6/2/2022, submitted by John P. Curp, Interim City Manager, regarding Department of Finance Report for the Month Ended April 30, 2022.  
  
**Sponsors:** City Manager  
**Attachments:** [Transmittal](#)  
[Attachments](#)
  
3. [202201266](#) ORDINANCE submitted by John P. Curp, Interim City Manager, on 6/2/2022, ACCEPTING AND CONFIRMING the grant of a public utility easement in favor of the City of Cincinnati for water mains, appurtenances, fixtures, and equipment in and upon certain real property located in the Waypoint Group Subdivision in Mt. Lookout as reflected on the plat entitled WSL# 323, Waypoint Group Subdivision, Water Easement Plat, as recorded in Plat Book 490, Pages 82 and 83, Hamilton County, Ohio Records.  
  
**Sponsors:** City Manager  
**Attachments:** [Transmittal](#)  
[Ordinance](#)  
[Attachment](#)



4. [202201270](#) ORDINANCE submitted by John P. Curp, Interim City Manager, on 6/2/2022, AUTHORIZING the City Manager to apply for a grant in the amount of up to \$25,000 from the United States Environmental Protection Agency, Region 5, to provide resources for the design and implementation of the Electrify Cincy Education Program, which will offer residential and technical expert training in support of residential electrification efforts, including weatherization, reduced energy consumption, and renewable energy upgrades.
- Sponsors:** City Manager
- Attachments:** [Transmittal](#)  
[Ordinance](#)
5. [202201272](#) ORDINANCE submitted by John P. Curp, Interim City Manager, on 6/2/2022, DETERMINING to proceed with special street lighting assessments in Lighting Group 3 for three years beginning August 1, 2021, pursuant to Ohio Revised Code §727.23, on the streets or portions of the streets described in Exhibit A hereto.
- Sponsors:** City Manager
- Attachments:** [Transmittal](#)  
[Ordinance](#)  
[Attachment](#)
6. [202201273](#) ORDINANCE submitted by John P. Curp, Interim City Manager, on 6/2/2022, TO LEVY special assessments to pay for a portion of the cost of special street lighting in Lighting Group 3, pursuant to Ohio Revised Code §727.25, for the three-year period beginning on August 1, 2021.
- Sponsors:** City Manager
- Attachments:** [Transmittal](#)  
[Ordinance](#)  
[Attachment](#)
7. [202201274](#) ORDINANCE submitted by John P. Curp, Interim City Manager, on 6/2/2022, AUTHORIZING the transfer and appropriation of the sum of \$150,000 from the unappropriated surplus of East Walnut Hills Equivalent Fund 486 (East Walnut Hills TIF District) to existing capital improvement program project account no. 980x232x212387, "East Walnut Hills Two-Way Conversion," to provide resources for the conversion of William Howard Taft Road, East McMillan Street, and Woodburn Avenue to two-way streets in the neighborhood of East Walnut Hills.
- Sponsors:** City Manager
- Attachments:** [Transmittal](#)  
[Ordinance](#)

8. [202201252](#) ORDINANCE (EMERGENCY) submitted by John P. Curp, Interim City Manager, on 5/25/2022, AUTHORIZING the City Manager to execute a Property Sale, Funding, and Development Agreement with Total Property care, LLC for the sale of City-owned real property located at 3584 Alaska Avenue and adjoining property on Harvey Avenue in the Avondale neighborhood of Cincinnati, in connection with the development of a residential subdivision consisting of 18 buildable lots for the construction of 18 single-family homes and a street that will be dedicated for use by the general public. (Subject to the Temporary Prohibition List <<https://www.cincinnati-oh.gov/law/ethics/city-business>>)

**Sponsors:** City Manager

**Attachments:** [Transmittal](#)  
[Ordinance](#)  
[Attachment](#)

9. [202201307](#) ORDINANCE (EMERGENCY) submitted by John P. Curp, Interim City Manager, on 6/2/2022, AUTHORIZING the City Manager to accept and appropriate the sum of \$3,029,588 from the United States Department of Housing and Urban Development to various Home Investment Trust Fund 411 project accounts in accordance with Section 1 of the attached Appropriation Schedule; AUTHORIZING the appropriation of the sum of \$211,042.76 in program income to various Home Investment Trust Fund 411 project accounts for the purpose of providing funding for the continuation of vital City programs in accordance with Section 1 of the attached Appropriation Schedule; ANNOUNCING the City's intention to use said sum for various projects and operating allocations for the HOME Investment Partnerships Grant Program for Calendar Year 2022 according to Section 1 of the attached Appropriation Schedule and to file the 2022 Annual Action Plan; AUTHORIZING the return to source of the sum of \$209,718.42 from various existing Home Investment Trust Fund 411 project accounts to the unappropriated surplus of Home Investment Trust Fund 411 for the purpose of realigning available grant resources in accordance with Section 2 of the attached Appropriation Schedule; and AUTHORIZING the appropriation of the sum of \$200,877.42 from the unappropriated surplus of Home Investment Trust Fund 411 to various Home Investment Trust Fund 411 project accounts for the purpose of aligning resources with program needs in accordance with Section 3 of the attached Appropriation Schedule.

**Sponsors:** City Manager

**Attachments:** [Transmittal](#)  
[Ordinance](#)  
[Attachment](#)

10. [202201309](#) ORDINANCE (EMERGENCY) submitted by John P. Curp, Interim City Manager, on 6/2/2022, AUTHORIZING the City Manager to accept and appropriate the sum of \$989,809 from the U.S. Department of Housing and Urban Development to Emergency Shelter Grant Fund 445 in accordance with the attached Appropriation Schedule; and ANNOUNCING the City's intention to use the funds for various projects and operating allocations for the Emergency Solutions Grant Program for Calendar Year 2022 and to file the 2022 Annual Action Plan.

**Sponsors:** City Manager

**Attachments:** [Transmittal](#)  
[Ordinance](#)  
[Attachment](#)

11. [202201310](#) ORDINANCE (EMERGENCY) submitted by John P. Curp, Interim City Manager, on 6/2/2022, AUTHORIZING the City Manager to accept and appropriate the sum of \$1,696,715 from the U.S. Department of Housing and Urban Development to Housing Opportunities for Persons with AIDS Fund 465; and announcing the City's intention to use said sum for various projects and operating allocations for the Housing Opportunities for Persons with HIV/AIDS Grant Program for Calendar Year 2022, in accordance with the attached Appropriation Schedule, and to file the 2022 Annual Action Plan.

**Sponsors:** City Manager

**Attachments:** [Transmittal](#)  
[Ordinance](#)  
[Attachment](#)

12. [202201311](#) ORDINANCE (EMERGENCY) submitted by John P. Curp, Interim City Manager, on 6/2/2022, AUTHORIZING the City Manager to accept and appropriate a grant of \$11,379,516 from the U.S. Department of Housing and Urban Development to various Community Development Block Grant Fund 304 project accounts in accordance with Section 1 of the attached Appropriation Schedule for the purpose of funding various projects and operating allocations for the Community Development Block Grant Program for Calendar Year 2022; ANNOUNCING the City's intention to use said funds for various projects and operating allocations for the Community Development Block Grant Program for Calendar Year 2022 according to Section 1 of the attached Appropriation Schedule and to file the 2022 Annual Action Plan; AUTHORIZING the return to source of the sum of \$2,500,000 from various Community Development Block Grant Fund 304 project accounts to the unappropriated surplus of Community Development Block Grant Fund 304 for the purpose of realigning available grant resources in accordance with Section 2 of the attached Appropriation Schedule; and AUTHORIZING the appropriation of \$2,500,000 from the unappropriated surplus of Community Development Block Grant Fund 304 project accounts for the purpose of realigning resources with program needs in accordance with Section 3 of the attached Appropriation Schedule.

**Sponsors:**

City Manager

**Attachments:**[Transmittal](#)[Ordinance](#)[Attachment](#)

7 DOCUMENT



# City of Cincinnati

801 Plum Street  
Cincinnati, Ohio 45202

## CALENDAR

### Cincinnati City Council

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Wednesday, June 8, 2022

2:00 PM

Council Chambers, Room 300

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#### ROLL CALL

#### PRAYER AND PLEDGE OF ALLEGIANCE

#### FILING OF THE JOURNAL

#### MAYOR AFTAB

#### Community Development Advisory Board

1. [202201347](#) **APPOINTMENT**, submitted by Mayor Aftab Pureval, I hereby appoint Jennifer McEvilly to the Community Development Advisory Board for a term of three years. This appointment is submitted to City Council for its advice and consent pursuant to its Rules. (Female/White).

**Recommendation** HOLD ONE WEEK PURSUANT TO THE RULES OF COUNCIL

**Sponsors:** Mayor

#### MR. HARRIS

2. [202201328](#) **RESOLUTION**, submitted by Councilmember Harris from Andrew Garth, City Solicitor, **RECOGNIZING** Jen Scott as a 2022 City of Cincinnati Pride Month honoree and **EXPRESSING** the appreciation of the Mayor and the Council of the City of Cincinnati for her continuous leadership and work with Cincinnati Pride and other organization in the City of Cincinnati, and her dedication to advancing LGBTQIA+ justice, equality for all persons, and the protection of our sacred democracy.

**Recommendation** PASS

**Sponsors:** Harris

3. [202201329](#) **RESOLUTION**, submitted by Councilmember Harris from Andrew Garth, City Solicitor, **RECOGNIZING** Marcel Hughes as a 2022 City of Cincinnati Pride Month honoree and **EXPRESSING** the appreciation of the Mayor and the Council of the City of Cincinnati for his continuous leadership and work with Equitas Health, Caracole, and other organizations in the City of Cincinnati and the surrounding region, as well as his dedication to advancing LGBTQIA+ justice, equality for all persons, and the protection of our sacred democracy.

**Recommendation** PASS

**Sponsors:** Harris

#### MR. JEFFREYS

**MS. OWENS****MR. JOHNSON****MR. CRAMERDING****MS. KEARNEY**

4. [202201344](#) **MOTION**, submitted by Councilmembers Jeffreys, Owens, Johnson, Cramerding and Vice Mayor Kearney, request the Administration report within ninety (90) days on a plan for rolling out leading pedestrian intervals (LPI) throughout Cincinnati's 52 neighborhoods. (STATEMENT ATTACHED)
- Recommendation** CLIMATE, ENVIRONMENT & INFRASTRUCTURE COMMITTEE
- Sponsors:** Jeffreys, Owens, Kearney, Johnson and Cramerding

**CITY MANAGER**

5. [202201257](#) **REPORT**, dated 6/8/2022, submitted by John P. Curp, Interim City Manager, regarding Special Event Permit Application for Festivals of Evanston.
- Recommendation** FILE
- Sponsors:** City Manager
6. [202201258](#) **REPORT**, dated 6/8/2022, submitted by John P. Curp, Interim City Manager, regarding Special Event Permit Application for The Kroger Wellness Festival.
- Recommendation** FILE
- Sponsors:** City Manager
7. [202201259](#) **REPORT**, dated 6/8/2022, submitted by John P. Curp, Interim City Manager, regarding Special Event Permit Application for Girls On The Run 2022.
- Recommendation** FILE
- Sponsors:** City Manager
8. [202201293](#) **REPORT**, dated 6/8/2022, submitted by John P. Curp, Interim City Manager, regarding Special Event Permit Application for Sayler Park Oktoberfest.
- Recommendation** FILE
- Sponsors:** City Manager
9. [202201297](#) **REPORT**, dated 6/8/2022, submitted by John P. Curp, Interim City Manager, regarding Special Event Permit Application for Longest Table.
- Recommendation** FILE
- Sponsors:** City Manager
10. [202201306](#) **REPORT**, dated 6/8/2022, submitted by John P. Curp, Interim City Manager, regarding Special Event Permit Application for Juneteenth Block Party 2022.
- Recommendation** FILE
- Sponsors:** City Manager



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11. [202201308](#) **REPORT**, dated 6/8/2022, submitted by John P. Curp, Interim City Manager, regarding Special Event Permit Application for The Price Hill Creative Community Festival.
- Recommendation** FILE
- Sponsors:** City Manager
12. [202201312](#) **REPORT**, dated 6/8/2022, submitted by John P. Curp, Interim City Manager, regarding Special Event Permit Application for Riverfest 2022.
- Recommendation** FILE
- Sponsors:** City Manager
13. [202201313](#) **REPORT**, dated 6/8/2022, submitted by John P. Curp, Interim City Manager, regarding Special Event Permit Application for Oktoberfest 2022.
- Recommendation** FILE
- Sponsors:** City Manager
14. [202201314](#) **REPORT**, dated 6/8/2022, submitted by John P. Curp, Interim City Manager, regarding Special Event Permit Application for Holy Grail Tailgate Block Parties.
- Recommendation** FILE
- Sponsors:** City Manager
15. [202201315](#) **ORDINANCE** submitted by John P. Curp, Interim City Manager, on 6/8/2022, **AUTHORIZING** the City Manager to accept and deposit a donation in an amount up to \$105,000 from the Cincinnati Parks Foundation into Parks Private Endowment and Donations Fund 430; and **AUTHORIZING** the transfer and appropriation of \$105,000 from the unappropriated surplus of Parks Private Endowment and Donations Fund 430 to existing capital improvement program project account no. 980x203x192009, "Tom Jones Commons," for the purpose of providing additional resources for improvements to Tom Jones Commons in Eden Park.
- Recommendation** BUDGET AND FINANCE COMMITTEE
- Sponsors:** City Manager
16. [202201316](#) **ORDINANCE** submitted by John P. Curp, Interim City Manager, on 6/8/2022, **AUTHORIZING** the City Manager to apply for grant resources in an amount of up to \$200,000,000 awarded by the United States Department of Transportation through the Nationally Significant Multimodal Freight and Highway Projects (ALN 20.934) and the National Infrastructure Project Assistance (ALN 20.937) discretionary grant programs for the construction of the Western Hills Viaduct.
- Recommendation** BUDGET AND FINANCE COMMITTEE
- Sponsors:** City Manager

17. [202201317](#) **ORDINANCE (EMERGENCY)** submitted by John P. Curp, Interim City Manager, on 6/8/2022, **AUTHORIZING** the transfer and appropriation of the sum of \$113,000 from the unappropriated surplus of General Fund 050, of which \$75,000 is transferred to Enterprise Technology Solutions General Fund non-personnel operating budget account no. 050x091x7200 for the purpose of providing funds for a security audit, \$15,000 is transferred to the Department of City Planning and Engagement General Fund non-personnel operating budget account no. 050x171x7200 for the purpose of providing funding for the Cincinnati Housing Solutions Summit, and \$23,000 is transferred to the Department of Economic Inclusion General Fund non-personnel operating budget account no. 050x281x7200 for the purpose of providing funds for relocation expenses of new employees; and **AUTHORIZING** the transfer and appropriation of the sum of \$148,000 from the unappropriated surplus of Municipal Golf Fund 105 to Cincinnati Recreation Commission Municipal Golf Fund debt service operating budget account no. 105x195x7700 for the purpose of paying debt service for golf equipment.

**Recommendation** BUDGET AND FINANCE COMMITTEE

**Sponsors:** City Manager

18. [202201318](#) **ORDINANCE** submitted by John P. Curp, Interim City Manager, on 6/8/2022, **ESTABLISHING** new capital improvement program project account no. 980x232x222359, "Victory Pkwy - Eden Park Safety Improvements," for the purpose of improving pedestrian and bicycle safety in the Victory Parkway Corridor between Martin Drive and McMillan Avenue, improving the condition and safety of the Park Avenue Bridge over Kemper Lane, and installing a sidewalk along the west side of Eden Park Drive from St. Paul Drive to Krohn Conservatory; **AUTHORIZING** the City Manager to accept and appropriate a federal Surface Transportation Block Grant (ALN 20.205) in an amount up to \$6,000,000, awarded by the Ohio-Kentucky-Indiana Regional Council of Governments, to new capital improvement program project account no. 980x232x222359, "Victory Pkwy - Eden Park Safety Improvements"; **AUTHORIZING** the Director of Finance to deposit the grant resources into newly established capital improvement program project account no. 980x232x222359, "Victory Pkwy - Eden Park Safety Improvements," for the purpose of improving pedestrian and bicycle safety in the Victory Parkway Corridor between Martin Drive and McMillan Avenue, improving the condition and safety of the Park Avenue Bridge over Kemper Lane, and installing a sidewalk along the west side of Eden Park Drive from St. Paul Drive to Krohn Conservatory; and **AUTHORIZING** the City Manager to execute any agreements necessary for the receipt and administration of these grant resources.

**Recommendation** BUDGET AND FINANCE COMMITTEE

**Sponsors:** City Manager



19. [202201322](#) **ORDINANCE (EMERGENCY)** submitted by John P. Curp, Interim City Manager, on 6/8/2022, **AUTHORIZING** the City Manager and employees of Cincinnati Recreation Commission to solicit and accept donations of money, sponsorships, in-kind contributions, team registration fees, vendor fees, and other things of value from the Cincinnati business community, individual benefactors, and other appropriate sources for the purpose of providing resources to support the 3 on 3 Basketball Tournament; and **AUTHORIZING** the Finance Director to deposit the resources donated to or generated by the event into Fund No. 319, "Contributions for Recreation Purposes."
- Recommendation** BUDGET AND FINANCE COMMITTEE
- Sponsors:** City Manager
20. [202201324](#) **ORDINANCE** submitted by John P. Curp, Interim City Manager, on 6/8/2022, **LEVYING** assessments for unpaid costs incurred by the City in making emergency repairs to sidewalks, sidewalk areas, curbs, and gutters at various locations in the City through the City of Cincinnati's Sidewalk Safety Program, in accordance with Cincinnati Municipal Code Sections 721-149 through 721-169.
- Recommendation** BUDGET AND FINANCE COMMITTEE
- Sponsors:** City Manager
21. [202201326](#) **ORDINANCE** submitted by John P. Curp, Interim City Manager, on 6/8/2022, **ACCEPTING AND CONFIRMING** the dedication to public use of approximately 0.0609 acres of real property in Linwood to be included as a portion of Eastern Avenue public right-of-way for street purposes in the Stoehr Subdivision in accordance with the plat entitled "Stoehr Subdivision."
- Recommendation** EQUITABLE GROWTH & HOUSING COMMITTEE
- Sponsors:** City Manager
- BUDGET AND FINANCE COMMITTEE**
22. [202201260](#) **REPORT**, dated 6/2/2022, submitted by John P. Curp, Interim City Manager, regarding Department of Finance Report for the Month Ended April 30, 2022.
- Recommendation** APPROVE & FILE
- Sponsors:** City Manager
23. [202201266](#) **ORDINANCE** submitted by John P. Curp, Interim City Manager, on 6/2/2022, **ACCEPTING AND CONFIRMING** the grant of a public utility easement in favor of the City of Cincinnati for water mains, appurtenances, fixtures, and equipment in and upon certain real property located in the Waypoint Group Subdivision in Mt. Lookout as reflected on the plat entitled *WSL# 323, Waypoint Group Subdivision, Water Easement Plat*, as recorded in Plat Book 490, Pages 82 and 83, Hamilton County, Ohio Records.
- Recommendation** PASS
- Sponsors:** City Manager

24. [202201270](#) **ORDINANCE** submitted by John P. Curp, Interim City Manager, on 6/2/2022, **AUTHORIZING** the City Manager to apply for a grant in the amount of up to \$25,000 from the United States Environmental Protection Agency, Region 5, to provide resources for the design and implementation of the Electrify Cincy Education Program, which will offer residential and technical expert training in support of residential electrification efforts, including weatherization, reduced energy consumption, and renewable energy upgrades.
- Recommendation** PASS
- Sponsors:** City Manager
25. [202201272](#) **ORDINANCE** submitted by John P. Curp, Interim City Manager, on 6/2/2022, **DETERMINING** to proceed with special street lighting assessments in Lighting Group 3 for three years beginning August 1, 2021, pursuant to Ohio Revised Code §727.23, on the streets or portions of the streets described in Exhibit A hereto.
- Recommendation** PASS
- Sponsors:** City Manager
26. [202201273](#) **ORDINANCE** submitted by John P. Curp, Interim City Manager, on 6/2/2022, **TO LEVY** special assessments to pay for a portion of the cost of special street lighting in Lighting Group 3, pursuant to Ohio Revised Code §727.25, for the three-year period beginning on August 1, 2021.
- Recommendation** PASS
- Sponsors:** City Manager
27. [202201274](#) **ORDINANCE** submitted by John P. Curp, Interim City Manager, on 6/2/2022, **AUTHORIZING** the transfer and appropriation of the sum of \$150,000 from the unappropriated surplus of East Walnut Hills Equivalent Fund 486 (East Walnut Hills TIF District) to existing capital improvement program project account no. 980x232x212387, "East Walnut Hills Two-Way Conversion," to provide resources for the conversion of William Howard Taft Road, East McMillan Street, and Woodburn Avenue to two-way streets in the neighborhood of East Walnut Hills.
- Recommendation** PASS
- Sponsors:** City Manager

28. [202201252](#) **ORDINANCE (EMERGENCY)** submitted by John P. Curp, Interim City Manager, on 5/25/2022, **AUTHORIZING** the City Manager to execute a *Property Sale, Funding, and Development Agreement* with Total Property care, LLC for the sale of City-owned real property located at 3584 Alaska Avenue and adjoining property on Harvey Avenue in the Avondale neighborhood of Cincinnati, in connection with the development of a residential subdivision consisting of 18 buildable lots for the construction of 18 single-family homes and a street that will be dedicated for use by the general public. (Subject to the [Temporary Prohibition List](#) <<https://www.cincinnati-oh.gov/law/ethics/city-business>>)

**Recommendation** PASS EMERGENCY

**Sponsors:** City Manager

29. [202201307](#) **ORDINANCE (EMERGENCY)** submitted by John P. Curp, Interim City Manager, on 6/2/2022, **AUTHORIZING** the City Manager to accept and appropriate the sum of \$3,029,588 from the United States Department of Housing and Urban Development to various Home Investment Trust Fund 411 project accounts in accordance with Section 1 of the attached Appropriation Schedule; **AUTHORIZING** the appropriation of the sum of \$211,042.76 in program income to various Home Investment Trust Fund 411 project accounts for the purpose of providing funding for the continuation of vital City programs in accordance with Section 1 of the attached Appropriation Schedule; **ANNOUNCING** the City's intention to use said sum for various projects and operating allocations for the HOME Investment Partnerships Grant Program for Calendar Year 2022 according to Section 1 of the attached Appropriation Schedule and to file the 2022 Annual Action Plan; **AUTHORIZING** the return to source of the sum of \$209,718.42 from various existing Home Investment Trust Fund 411 project accounts to the unappropriated surplus of Home Investment Trust Fund 411 for the purpose of realigning available grant resources in accordance with Section 2 of the attached Appropriation Schedule; and **AUTHORIZING** the appropriation of the sum of \$200,877.42 from the unappropriated surplus of Home Investment Trust Fund 411 to various Home Investment Trust Fund 411 project accounts for the purpose of aligning resources with program needs in accordance with Section 3 of the attached Appropriation Schedule.

**Recommendation** PASS EMERGENCY

**Sponsors:** City Manager

30. [202201309](#) **ORDINANCE (EMERGENCY)** submitted by John P. Curp, Interim City Manager, on 6/2/2022, **AUTHORIZING** the City Manager to accept and appropriate the sum of \$989,809 from the U.S. Department of Housing and Urban Development to Emergency Shelter Grant Fund 445 in accordance with the attached Appropriation Schedule; and **ANNOUNCING** the City's intention to use the funds for various projects and operating allocations for the Emergency Solutions Grant Program for Calendar Year 2022 and to file the 2022 Annual Action Plan.

**Recommendation** PASS EMERGENCY

**Sponsors:** City Manager

31. [202201310](#) **ORDINANCE (EMERGENCY)** submitted by John P. Curp, Interim City Manager, on 6/2/2022, **AUTHORIZING** the City Manager to accept and appropriate the sum of \$1,696,715 from the U.S. Department of Housing and Urban Development to Housing Opportunities for Persons with AIDS Fund 465; and announcing the City's intention to use said sum for various projects and operating allocations for the Housing Opportunities for Persons with HIV/AIDS Grant Program for Calendar Year 2022, in accordance with the attached Appropriation Schedule, and to file the 2022 Annual Action Plan.

**Recommendation** PASS EMERGENCY

**Sponsors:** City Manager

32. [202201311](#) **ORDINANCE (EMERGENCY)** submitted by John P. Curp, Interim City Manager, on 6/2/2022, **AUTHORIZING** the City Manager to accept and appropriate a grant of \$11,379,516 from the U.S. Department of Housing and Urban Development to various Community Development Block Grant Fund 304 project accounts in accordance with Section 1 of the attached Appropriation Schedule for the purpose of funding various projects and operating allocations for the Community Development Block Grant Program for Calendar Year 2022; **ANNOUNCING** the City's intention to use said funds for various projects and operating allocations for the Community Development Block Grant Program for Calendar Year 2022 according to Section 1 of the attached Appropriation Schedule and to file the 2022 Annual Action Plan; **AUTHORIZING** the return to source of the sum of \$2,500,000 from various Community Development Block Grant Fund 304 project accounts to the unappropriated surplus of Community Development Block Grant Fund 304 for the purpose of realigning available grant resources in accordance with Section 2 of the attached Appropriation Schedule; and **AUTHORIZING** the appropriation of \$2,500,000 from the unappropriated surplus of Community Development Block Grant Fund 304 project accounts for the purpose of realigning resources with program needs in accordance with Section 3 of the attached Appropriation Schedule.

**Recommendation** PASS EMERGENCY

**Sponsors:** City Manager

## SUPPLEMENTAL ITEMS

## CLIMATE, ENVIRONMENT & INFRASTRUCTURE COMMITTEE

33. [202201291](#) **MOTION**, submitted by Councilmember Cramerding, **WE MOVE** that the Administration study and provide a report on traffic calming initiatives along Queen City Avenue, Westwood Avenue, Sunset Avenue, and Rapid Run Pike. This should include short-term measures and long-term measures. It should also include option for conventional two-way traffic on Queen City Avenue and Westwood Avenue. (STATEMENT ATTACHED)

**Recommendation** ADOPT

**Sponsors:** Cramerding

34. [202201292](#) **MOTION**, submitted by Councilmember Cramerding, **WE MOVE** that the Administration study and provide a report on bike trail infrastructure measures linking the West Side to Downtown, including along State Avenue and West Eighth Street in Lower Price Hill. It should also consider what elements can provide foundations for the future Dunham to Lick Run bike trail in the interim and long-term. (STATEMENT ATTACHED)

**Recommendation** ADOPT

**Sponsors:** Cramerding

35. [202201296](#) **MOTION**, submitted by Councilmembers Harris, Owens, Keating and Jeffreys, **WE MOVE** that the Administration provide a report within thirty (30) days outlining the feasibility, impact, and implementation of removing the city's rush hour parking restrictions throughout the entire city. (STATEMENT ATTACHED)

**Recommendation** ADOPT

**Sponsors:** Harris, Owens, Keating and Jeffreys

## EQUITABLE GROWTH & HOUSINGS COMMITTEE

36. [202201158](#) **ORDINANCE** submitted by John P. Curp, Interim City Manager, on 5/11/2022, **AUTHORIZING** certain signage and street-level improvements to the building located at 50 W. 5th Street in the Central Business District NOTWITHSTANDING the provisions of Section 1411-21, "Ground Floor Transparency," and Section 1411-39, "Signs," of Chapter 1411, "Downtown Development Districts," of the Cincinnati Municipal Code. (Subject to the [Temporary Prohibition List](https://www.cincinnati-oh.gov/law/ethics/city-business) [<https://www.cincinnati-oh.gov/law/ethics/city-business>](https://www.cincinnati-oh.gov/law/ethics/city-business))

**Recommendation** PASS

**Sponsors:** City Manager

37. [202201290](#) **MOTION**, submitted by Councilmembers Cramerding, Parks and Vice Mayor Kearney, **WE MOVE** that the Administration provide a REPORT on how the city can include fair wages and safe working conditions clauses in development projects that receive a municipal benefit, rather than placing such requirements on a contract-by-contract bases. (STATEMENT ATTACHED)

**Recommendation** ADOPT

**Sponsors:** Cramerding, Parks and Kearney

The background of the slide features a series of overlapping, curved shapes in shades of blue and green, creating a dynamic, abstract design. A white curved line sweeps across the middle of the slide.

city of  
CINCINNATI

## U.S Department of Housing and Urban Development Entitlement Funding

Morgan Sutter, Director of Grant Administration  
June 6, 2022



# Federal Requirements


## Overview of Consolidated Plan

- City of Cincinnati is an **Entitlement Jurisdiction** as determined by HUD
- Federal allocations** based on a community formula according to extent of poverty, population, housing over crowding, age of housing, and population growth lag
- Consolidated Plan** (2020 – 2024) contains:
  - Community Needs Assessment
  - Housing Market Analysis
  - Strategic Plan (with 5-year benchmarks)
  - Furthering Fair Housing Assessment
- Annual Reporting**
  - Annual Action Plans (AAP)
    - Submitted yearly to allocate funding to the identified programs
  - Consolidated Annual Performance and Evaluation Reports (CAPER)

1

CINCINNATI

city of



HUD – U.S. Department of Housing and Urban Development

4 entitlement grant programs, HOME, ESG, HOPWA, CDBG

Con Plan - Framework for the City to identify housing homeless, special populations, and community and economic development needs and resources and tailor a strategic plan for meeting those needs

The Strategic Plan outlines programs and corresponding benchmarks to achieve over the 5 years. The Annual Action Plan allocates funding to the programs yearly.

Community participation is an integral part of each report and plan.

## Federal Grant Programs

### Overview of 4 Entitlement Programs

- **Community Development Block Grant (CDBG)**
  - National Objectives: benefit low-moderate income individuals ( $\geq 70\%$ ); eliminate slum and blight ( $\leq 30\%$ ); or urgent need
  - Caps on public service activities (i.e. job training)
- **HOME Investment Partnerships Program (HOME)**
  - Affordable housing for low-income individuals
- **Emergency Solutions Grant (ESG)** – serves homeless population
- **Housing Opportunities for Persons With HIV/AIDS (HOPWA)**

2



#### 2022 Entitlement Awards:

CDBG: \$11,379,516

HOME: \$3,029,588

ESG: \$989\*,809

HOPWA: \$1,696,715



## Public Participation Process



3

## Community Development Advisory Board (CDAB) for 2022

- |   |  |
|---|--|
| <b>1</b> American Dream Downpayment Initiative                  |  |
| <b>2</b> Strategic Housing Initiatives Program                  | <b>14</b> Concentrated Code Enforcement                            |
| <b>3</b> Compliance Assistance Repairs for the Elderly          | <b>15</b> Lead Hazard Testing Program                              |
| <b>4</b> Emergency Mortgage Assistance                          | <b>16</b> Operating Support for Community Development Corporations |
| <b>5</b> Youth and Young Adult Employment Program               | <b>17</b> Hand Up Initiative                                       |
| <b>6</b> Homeowner Assistance Repairs and Building Order Relief | <b>18</b> Hazard Abatement Program                                 |
| <b>7</b> Housing Repair Services                                | <b>19</b> Tenant Representation                                    |
| <b>8</b> Neighborhood Business District Improvement Program     | <b>20</b> Commercial and Industrial Redevelopment                  |
| <b>9</b> Fair Housing Services                                  | <b>21</b> Historic Stabilization of Structures                     |
| <b>10</b> Blueprint For Success                                 | <b>22</b> Small Business Services                                  |
| <b>11</b> Housing Choice Mobility Program                       | <b>23</b> Vacant Lot Reutilization                                 |
| <b>12</b> Family Re-Housing Assistance                          | <b>24</b> Green Urban Watershed Restoration                        |
| <b>13</b> Project Lift  | <b>25</b> Findlay Market Operating Support                         |

## Moderate to Low Income Limits

2022 Income Limits (changes annually)

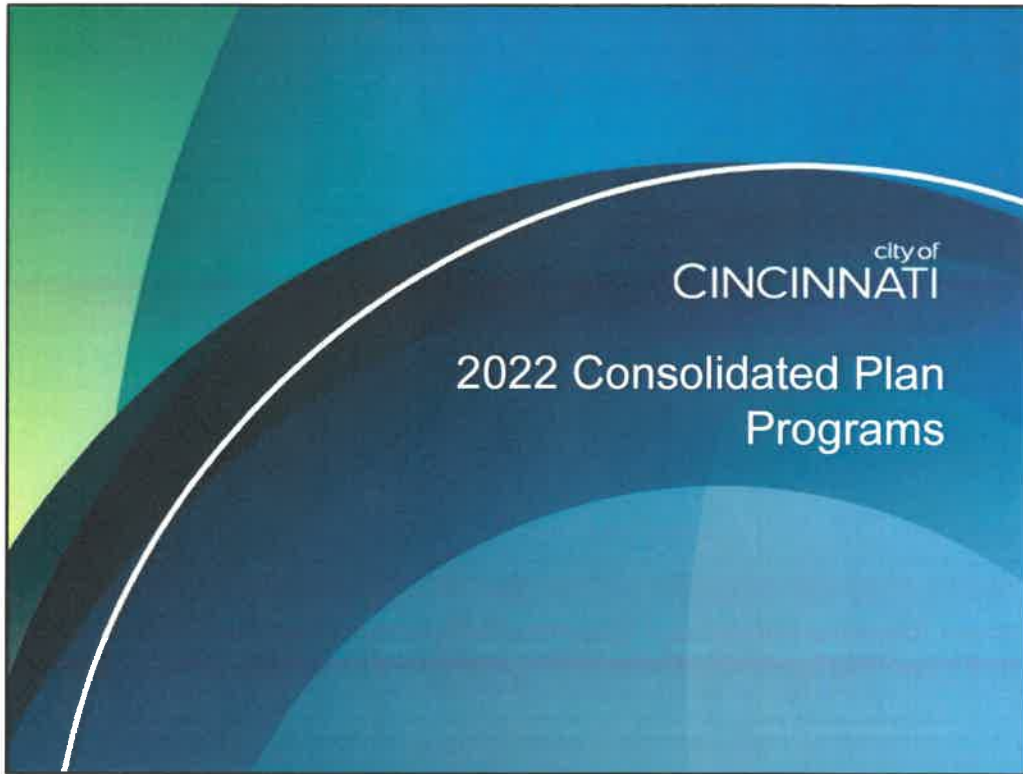
Income Level	1 Person	2 People	3 People	4 People	5 People
Extremely Low Income (30% AMI)	\$20,100	\$22,950	\$25,800	\$28,650	\$30,950
Very Low Income (50% AMI)	\$33,450	\$38,200	\$43,000	\$47,750	\$51,600
Low Income (60% AMI)	\$40,140	\$45,840	\$51,600	\$57,300	\$61,920
Moderate Income (80% AMI)	\$53,500	\$61,150	\$68,800	\$76,400	\$82,550

Source: <http://www.hud.gov>  
AMI = Area Median Income



The focus of the City's federal grant programs is to support our moderate to low income population, meaning individuals and families whose income is at 80% of the area's median income (AMI) or lower. Different programs have specific income requirements but all are aimed at 80% AMI or lower. Coined "low-mod".

The low-mod population can be a direct benefit (meaning the individual being assisted is at 80% AMI) or it is an area benefit (meaning at least 51% of the population in a specific census tract is at 80% AMI or lower). The map of low-mod census tracts in the City was distributed at the meeting and shown on the following slide.



## Workforce Development

- **Blueprint For Success**
  - \$50,000
- **Hand Up Initiative**
  - \$1,100,000
- **Youth and Young Adult Employment**
  - \$500,000

6



**\*\*prior years resources were available**

## Supportive Services

- **Emergency Mortgage Assistance**
  - \$215,000
- **Fair Housing Services**
  - \$170,000
- **Tenant Representation**
  - \$255,000
- **Project Lift**
  - \$200,000
- **Family Re-Housing Assistance**
  - \$130,000

7



\*\*prior years' resources were available

\*\*\* Working on defining / ramping up program

## Housing Development

- **Housing Repair Services**
  - \$1,988,613
- **Historic Stabilization of Structures**
  - \$200,000
- **Homeowner Assistance Repairs and Building Order Relief**
  - \$250,000
- **Strategic Housing Initiatives Program**
  - \$350,000 – CDBG
  - \$2,310,649 – HOME
- **Community Housing Development Organization Projects – HOME**
  - \$454,439

8



\*\*prior year resources available

## Non-Housing Development

- **Commercial and Industrial**
  - \$500,000
- **Concentrated Code Enforcement**
  - \$589,000
- **Hazard Abatement Program**
  - \$750m000
- **Neighborhood Business Improvement Program**
  - \$900,000
- **Small Business Services**
  - \$100,000



## Non-Housing Development

- Findlay Market Operating Support
  - \$75,000
- Operating Support for CDCs – CDBG
  - \$300,000
- Operating Support for CHDOs – HOME
  - \$151,479
- Vacant Lot Reutilization
  - \$85,000

## ESG and HOPWA

- **Emergency Solutions Grant (ESG) \$989,809**
  - Rapid Re-Housing
  - Shelter Assistance
- **Housing Opportunities for Persons With HIV/AIDS (HOPWA) \$1,696,715**
  - Supportive Services
  - Operating / Leasing
  - Short Term Rental and Utility Assistance
  - Permanent Housing Placement
  - Tenant Based Rental Assistance



## **2020 – 2024 CONSOLIDATED PLAN’S 2022 ANNUAL ACTION PLAN AND 2021 CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT**

### **Public Meeting Notice**

**City of Cincinnati**

**Community Development Advisory Board Meeting**

**Monday, March 7, 2022, 5 – 6 PM**

Via Zoom Meeting: <https://bit.ly/3uZf72R>

Meeting ID: 878 3680 3168

Passcode: 914702

Call in number: (301) 715-8592

A public meeting will be held via Zoom regarding the City's 2020 – 2024 Consolidated Plan's 2022 Annual Action Plan and the 2021 Consolidated Annual Performance and Evaluation Report. The City administers federal funds from the U.S. Department of Housing and Urban Development (HUD): Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons With HIV/AIDS (HOPWA). There are a total of 33 different programs to improve the quality of life, eliminate slum and blight, conduct workforce development activities, create jobs and assist businesses, create, renovate, and facilitate access to housing, and benefit moderate to low income areas and residents. The programs and calendar year 2021 accomplishments will be presented to the Community Development Advisory Board (CDAB). CDAB will provide priority recommendations considered when allocating funds to the programs for 2022. Also, the stimulus funding for ESG-Coronavirus Aid, Relief, and Economic Security (CARES), HOPWA-CARES, CDBG-CARES, and HOME – American Rescue Plan (ARP) will be presented and discussed.

The 2020 – 2024 Consolidated Plan's reports can be viewed on the City's Web site at the following URL:

<https://www.cincinnati-oh.gov/community-development/hud-entitlement-grant-submissions/>

To provide comments with regards to the City's HUD funded programs, written comments may be submitted to [aisha.tzillah@cincinnati-oh.gov](mailto:aisha.tzillah@cincinnati-oh.gov) or to City of Cincinnati, 801 Plum Street SSuite 104, Cincinnati, Ohio 45202 to the attention of Aisha Tzillah, Community Development Administrator, no later than March 25, 2022 to be included in a submission of written public comments to HUD.

POSTED – February 18, 2022

NOTARY CERTIFICATE

STATE OF OHIO  
COUNTY OF HAMILTON

I, Matthew Heldman, a Notary Public in and for said State, hereby certify that Aisha Tzillah whose name as Community Development Administrator of THE CITY OF CINCINNATI, a municipal corporation, has posted the Public Meeting Notice that occurred on March 7, 2022 for the presentation and discussion as well as request for public comments until March 24, 2022 of the 2022 Annual Action Plan at public, accessible government buildings visible to the general public at the City of Cincinnati City Hall located at 801 Plum Street, Cincinnati, Ohio 45202 and the Department of Community and Economic Development located at 805 Central Avenue Suite 700, Cincinnati, Ohio 45202. The posting was made available to the public starting February 18, 2022 and was posted until March 24, 2022.

SWORN TO AND SUBSCRIBED BEFORE ME BY: 

Given under my hand this the 25<sup>th</sup> day of March 2022.



NOTARY PUBLIC

My Commission Expires: 7/25/26



MATTHEW HELDMAN  
Notary Public, State of Ohio  
My Commission Expires:  
07-25-2026

NOTARY CERTIFICATE

STATE OF OHIO  
COUNTY OF HAMILTON

I, Matthew Heldman, a Notary Public in and for said State, hereby certify that Aisha Tzillah whose name as Community Development Administrator of THE CITY OF CINCINNATI, a municipal corporation, has posted the Public Meeting Notice that occurred on March 7, 2022 for the presentation and discussion as well as request for public comments until March 24, 2022 of the 2021 Consolidated Annual Performance and Evaluation Report at public, accessible government buildings visible to the general public at the City of Cincinnati City Hall located at 801 Plum Street, Cincinnati, Ohio 45202 and the Department of Community and Economic Development located at 805 Central Avenue Suite 700, Cincinnati, Ohio 45202. The posting was made available to the public starting February 18, 2022 and was posted until March 24, 2022.

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MATTHEW HELDMAN  
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# Classifieds

To advertise, visit:  
**classifieds.cincinnati.com**

■ Classifieds Phone:  
■ Classifieds Email:  
■ Public Notices/Legal



All classified ads are subject to the applicable rate card, copies of which are available from our Advertising Dept. All ads are subject to approval before publication. We reserve the right to edit, refuse, reject, classify or cancel any ad at any time. Errors must be reported in the first day of publication. The Enquirer shall not be liable for an error in or omission of an advertisement. No refunds for early cancellation of order.

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### Public Notices

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#### OFFICIAL PUBLICATION

##### 2022 - 2024 CONSOLIDATED PLAN'S 2022 ANNUAL ACTION PLAN AND 2021 CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

Public Meeting Notice  
City of Cincinnati  
Community Development Advisory  
Board Meeting  
Monday, March 7, 2022, 5 - 6 PM  
Via Zoom Meeting  
https://cincinatl.zoom.us/j/9302722  
Meeting ID: 930 272 22  
Passcode: 914702

Call in number: (301) 715-8592  
A public meeting will be held via Zoom regarding the City's 2022 - 2024 Consolidated Plan's 2022 Annual Action Plan and the 2021 Consolidated Annual Performance and Evaluation Report. The City administers federal funds from the U.S. Department of Housing and Urban Development (HUD): Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons With HIV/AIDS (HOPWA). There are a total of 33 different programs to improve the quality of life, eliminate stigma and bias, conduct workforce development activities, create jobs and assist businesses, create, renovate, and facilitate access to housing and benefit moderate to low income areas and residents. The programs and calendar year 2021 accomplishments will be presented to the Community Development Advisory Board (CDAB). CDAB will provide priority recommendations considered when allocating funds to the programs for 2022.

The 2020 - 2024 Consolidated Plan's reports can be viewed on the City's Web site at the following URL:  
https://www.cincinnati-oh.gov/community-development/mud-enrollment-and-submissions/

To provide comments with regards to the City's HUD funded programs, written comments may be submitted to [alisha.trillish@cincinnati-oh.gov](mailto:alisha.trillish@cincinnati-oh.gov) or

#### OFFICIAL PUBLICATION

to City of Cincinnati, 801 Plum Street Suite 104, Cincinnati, Ohio 45202 to the attention of Aisha Trillish, Community Development Administrator, no later than March 25, 2022 to be included in a submission of written public comments to HUD.  
(CIN, Feb 24, '22, #5145868)

##### ADVERTISEMENT

The Loveland City School District is soliciting bids for the purchase of HVAC Roof-top Units.

Plans and specifications are available at the District Office or by emailing John Ames, Business Manager at a [james@lovelandschools.org](mailto:james@lovelandschools.org). Proposals shall be submitted in sealed envelopes and marked "2022 HVAC Unit Bid". Proposals must be submitted to the Loveland City School District, 757 South Lebanon Road, Loveland, OH 45140, Attn: John Ames, no later than 2:00 pm EST on February 25, 2022.

CIN, Feb 17, 24, '22 #5135887

Housing Choice Voucher Project-Based Assistance for Existing, Rehabilitated or Newly Constructed Housing Units - Solicitation 2022-2001; Cincinnati Metropolitan Housing Authority (CMHA) is soliciting Requests for Proposals (RFP) for the subject services and will receive proposals until March 23, 2022, no later than 11:00 A.M. (Local Time) by email to [procurement@cmha.com](mailto:procurement@cmha.com). The RFP and related documents may be obtained by visiting our website at <https://cmha.com>

#### OFFICIAL PUBLICATION

m/business-opportunities/resources/current-solicitations-act ive. Questions concerning this RFP may be directed to Jonell Duncan at [jonell.duncan@cmha.com](mailto:jonell.duncan@cmha.com).



CIN, Feb 17, 24, '22 #5135298

Pursuant to R.C. 723.04 and 723.07, notice is hereby given that the Cincinnati City Council has received a petition from Petitioner BAM Realty Group, LLC praying for the vacation and sale of a portion of Madison Road public right-of-way, in the Oakley neighborhood of Cincinnati, Ohio, BEGINNING at an existing iron pin with cap stamped "Nordloh" in the west line of Madison Road and at the most easterly corner of a tract conveyed to BAM Realty Group, LLC in Official Record 14187, Page 1166 of the Hamilton County Recorder's Office; Thence through the lands of the Grantor, South 37°06'41" East, 35.24 feet to a set iron pin in the proposed right of way; Thence with the proposed right of way and through the land of the Grantor the following five (5) courses: (1) South 52°44'36" West, 5.78 feet to a set iron pin, (2) South 62°10'16" West, 16.99 feet to a set iron pin, (3) South 62°54'32" West, 41.03 feet to a set iron pin, (4) South

#### OFFICIAL PUBLICATION

53°03'42" West, 33.30 feet to a set iron pin, (5) North 37°20'54" West, 24.88 feet to a set iron pin in a southeast line of aforesaid BAM Realty Group, LLC; Thence with a southeast line of said BAM Realty Group, LLC, North 52°39'06" East, 96.36 feet to the POINT OF BEGINNING. CONTAINING 0.0635 ACRES and being subject to all legal easements and highways of record, which petition may be considered by the Cincinnati City Council following publication of this notice for six consecutive weeks.

For further information, contact the City of Cincinnati Real Estate Department in Room 122, City Hall, 801 Plum Street; (513) 352-3610.  
CIN, Feb. 3, 10, 17, 24, Mar. 3, 10, '22 #5107100

The Covington Consortium, consisting of the Housing Authority of Covington (HAC), KY and the City of Covington Housing Choice Voucher Program developed its Agency Plan in compliance with the Quality Housing and Work Responsibility Act of 1998. Effective February 25, 2022, the Plan and pertaining documents will be made available for public review at: The Housing Authority of Covington Administration Building, 2300 Madison Avenue, Covington, 41014; The Housing Authority of Covington website, [hacov.org](http://hacov.org); The Housing Authority of Covington Property

#### OFFICIAL PUBLICATION

Management Offices following locations: Terrace, 2940 Mpdia Covington, 41015a Heights, 2500 Todd, 41011; Golden T E. 11th Street C 41011; Covington Housing Development 20 West Pike Street, 41011; Public Li Scott Street, Covington and Northern Kentu Ald, 104 East 7th Str ington, 41011. The Authority's hours of are 8:00 a.m. - 4 Monday-Friday, national, state and days.

The Housing Authority's Board of sioners' will convene hearings to discuss the Year Plan and eirments from the public ing proposed activi Hearing will begin p.m. on April 20, 20 lower-level confere at the Housing Auth Covington Admin Building located Madison Avenue, C KY. The public is in attend. The Admin Building is an at building. However, COVID-19 restrictions is limited to the first person attendees. A ternative to in-person ance, you may submit tions / comments in w Info@hacov.org by 1

Homes for Sale-Ohio

Homes for Sale-Ohio



All real estate advertising in this newspaper is subject to the Federal Fair Housing Act of 1968 which makes it illegal to advertise any preference, limitation or discrimination based on race, color, religion, sex, national origin, handicap or familial status or an intention to make any such preference, limitation or discrimination.

This newspaper will not knowingly accept any advertising for real estate which is in violation of the law. Our readers are hereby informed that all dwellings advertised in this newspaper are available on an equal opportunity basis.

Kentucky Commission on Human Rights  
800-292-5566  
M.O.M.E. (Housing Opportunities Made Equal)  
513-721-466

## Business & Service Directory

to advertise, email: [ServiceDirectory@enquirer.com](mailto:ServiceDirectory@enquirer.com) or call: 855.288.3511

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WE SERVICE ALL APPLIANCES & REPAIR THEM. 513-317-1849

### Handyman Services

HANDY MAN SERVICE & HAULING!  
513-317-1849

### Hauling

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Clean Out, Yard Work, Leaves, Brush, Mulch, Junk Removal 513-324-6726

Mark's Hauling & Property Clean Up  
Clean Outs, Yard Work, Leaf, Mulch, Bush, Junk Removal 513-720-3688

### Moving

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### Senior Home

Home Care  
Tristate Healthcare Services  
www.tristate.com 513-2



REFERENCE REQUEST: The applicant requests a Certificate of Appropriateness to construct a three story rear addition on an existing residential structure, including a garage, living area and roof deck in the East Walnut Hills Historic District. Additionally, the applicant requests zoning relief related to side yard setbacks.

CASE NUMBER: COA2021041

SUBJECT PROPERTY: 40 E COURT ST  
BOARD HEARING: HISTORIC  
CONSERVATION BOARD

HEARING DATE: 09 27 2021 at 3:00 PM  
HEARING LOCATION: To comply with social distancing, this hearing will be conducted through a virtual platform. Please visit [www.cincinnati-oh.gov/boards](http://www.cincinnati-oh.gov/boards) regarding procedures and rules for participation

PRE HEARING DATE: 09 08 2021 at 9:30am

PRE HEARING LOCATION: To comply with social distancing, this hearing will be conducted through a virtual platform at <https://cincinnati-oh.webex.com/meet/beth.johnson>

APPLICANT: ABC SIGNS

REFERENCE REQUEST: The applicant requests a Certificate of Appropriateness to install an illuminated commercial sign in the Court Street Historic District. Additionally, the applicant requests zoning relief related to location of the sign.

CASE NUMBER: COA2021042

SUBJECT PROPERTY: 6060 HAMILTON AV  
BOARD HEARING: HISTORIC  
CONSERVATION BOARD

HEARING DATE: 09 27 2021 at 3:00 PM  
HEARING LOCATION: To comply with social distancing, this hearing will be conducted through a virtual platform. Please visit [www.cincinnati-oh.gov/boards](http://www.cincinnati-oh.gov/boards) regarding procedures and rules for participation

PRE HEARING DATE: 09 08 2021 at 10:00am

PRE HEARING LOCATION: To comply with social distancing, this hearing will be conducted through a virtual platform at <https://cincinnati-oh.webex.com/meet/beth.johnson>

APPLICANT: ARCX STUDIO

REFERENCE REQUEST: The applicant requests zoning relief for the location of first floor offices in an existing mixed-use structure as well as Urban Design Overlay approval in the College Hill Historic District.

CASE NUMBER: COA2021043

SUBJECT PROPERTY: 1684 CENTRAL  
PKWY

BOARD HEARING: HISTORIC  
CONSERVATION BOARD

HEARING DATE: 09 27 2021 at 3:00 PM

HEARING LOCATION: To comply with social distancing, this hearing will be conducted through a virtual platform. Please visit [www.cincinnati-oh.gov/boards](http://www.cincinnati-oh.gov/boards) regarding procedures and rules for participation

PRE HEARING DATE: 09 08 2021 at 10:30am

PRE HEARING LOCATION: To comply with social distancing, this hearing will be conducted through a virtual platform at <https://cincinnati-oh.webex.com/meet/beth.johnson>

APPLICANT: NASSAU AVENUE  
INVESTMENTS LLC % MODEL GROUP

REFERENCE REQUEST: The applicant requests a Certificate of Appropriateness to construct a four story structure with 32 residential units in the Over the Rhine Historic District. Additionally, the applicant requests zoning relief related to density and conditional use approval.

CASE NUMBER: COA2021044

SUBJECT PROPERTY: 2 HUST AL  
BOARD HEARING: HISTORIC  
CONSERVATION BOARD

HEARING DATE: 09 27 2021 at 3:00 PM  
HEARING LOCATION: To comply with social distancing, this hearing will be conducted through a virtual platform. Please visit [www.cincinnati-oh.gov/boards](http://www.cincinnati-oh.gov/boards) regarding procedures and rules for participation

PRE HEARING DATE: 09 08 2021 at 11:00am

PRE HEARING LOCATION: To comply with social distancing, this hearing will be conducted through a virtual platform at <https://cincinnati-oh.webex.com/meet/beth.johnson>

APPLICANT: PATRICIA BITTNER

REFERENCE REQUEST: The applicant requests a Certificate of Appropriateness to rehabilitate an existing two family structure, including window and door replacement, and new roof deck in the Over the Rhine Historic District

The Board has the duty to provide notice of its hearing postmarked at least seven days in advance of the hearing to all property owners located within two hundred feet of the boundaries of the Subject Property, as per Cincinnati Zoning Code §1435 09 1 E. The purpose of the pre hearing conference is to provide interested parties with an opportunity to review the project and to ask questions prior to the hearing. No decision on the application will be made at

the pre hearing conference. Questions and concerns should be directed to the Historic Conservation Office:

Beth Johnson  
805 Central Ave, Suite 500  
Cincinnati, Ohio 45202  
513 352 4848

[Urban.conservator@cincinnati-oh.gov](mailto:Urban.conservator@cincinnati-oh.gov)

**CITY OF CINCINNATI  
2020 – 2024 CONSOLIDATED  
PLAN, 2021 ANNUAL ACTION  
PLAN SECTION 108 APPLICATION  
AND 2022 ANNUAL ACTION PLAN  
PROGRAM PRIORITIES**

**NOTICE OF PUBLIC HEARING  
AND INTENT TO REQUEST  
RELEASE OF FUNDS**

The City of Cincinnati administers federal funds from the U.S. Department of Housing and Urban Development (HUD). Pursuant to the City's HUD-approved 2020 – 2024 Consolidated Plan and 2021 Annual Action Plan, on or about September 30, 2021 the City will submit a Section 108 application establishing up to a \$34 Million loan pool. The loan pool will be used to provide gap financing for eligible affordable housing projects which meet local goals and HUD National Objectives. Prospective projects will vary in size and scope, with funds being used for, but not limited to, projects in the following categories: predevelopment financing, real property acquisition financing, housing rehabilitation financing, Low-Income Housing Tax Credit equity bridge financing, and eligible development activities undertaken by a federally compliant community-based development organization. At this time, no program income is anticipated to be generated from this program. The City will receive public comments on the draft application at a public hearing on September 14, 2021 at 4:00 pm. The meeting will be held at City administrative offices in Centennial II Building, 805 Central Avenue, 7th floor, Cincinnati, Ohio 45202. The 2020-2024 Consolidated Plan/2021 Action Annual Plan and Section 108 draft application can be reviewed at <https://www.cincinnati-oh.gov/community-development/hud-entitlement-grant-submissions/>, or by contacting Aisha Tzillah via e-mail at [Aisha.Tzillah@](mailto:Aisha.Tzillah@)



Cincinnati-Oh.gov. Following agency approval of the final CDBG Section 108 loan application, the City will submit further request to HUD for the release of funds as projects are approved.

The City of Cincinnati also receives annual funding from HUD to support programs that address community needs. Public comments will be solicited to identify and prioritize community needs for use of HUD funding for calendar year 2022. A survey has been prepared to facilitate collection of community feedback by individuals who live or work in the City of Cincinnati. The survey may be accessed at <https://www.surveymonkey.com/r/cincinnati-speaks-2021>. The survey will be available to the public until January 31, 2022. Written comments may also be submitted to Aisha.Tzillah@Cincinnati-Oh.gov or to City of Cincinnati, 805 Central Avenue Suite 700, Cincinnati, Ohio 45202 to the attention of Aisha Tzillah, Community Development Administrator, no later than January 31, 2022 to be included in a submission of written comments to HUD.

Also, on or about September 20, 2021 the City of Cincinnati will submit a request to HUD, the administering agency, for the release of Emergency Solutions Grant – Coronavirus Aid, Relief and Economic Security Act (ESG-CV) funds under Title 1 of the Housing and Community Development Act of 1974 (PL 93-383), as amended, to undertake the projects for the purpose of, as permitted by the CARES Act, renovation (including major rehabilitation and conversion) of real property into temporary emergency shelters in response to prevent, prepare for, and respond to the epidemic.

The activities proposed in the program have been reviewed to determine the level of environmental review required and have been determined to be categorically excluded per 24 CFR 58.35(a) and subject to 24 CFR 58.5; all projects will receive a further case-by-case review for compliance with applicable historic, floodplain, coastal barrier, runway protection zone, noise pollution, and air pollution regulations before funds are released to the specific activity. An Environmental Review Record (ERR) that documents the environmental determinations for the projects will be maintained on file at the City of Cincinnati Department of Community and Economic Development, 805 Central Avenue Suite

700, Cincinnati, Ohio 45202 and may be examined or copied weekdays 9 a.m. through 4 p.m. The ERR may be requested via electronic-mail at [Aisha.Tzillah@cincinnati-oh.gov](mailto:Aisha.Tzillah@cincinnati-oh.gov) or via phone at (513) 352-6146. Hard copies and / or electronic copies will be sent as requested.

### **COVID Meeting Protocols**

Due to COVID-related safety measures currently in place at City Hall and City administrative offices, any members of the public not fully vaccinated are required to wear masks and socially distance at least six feet away from others while inside City facilities. All members of the public will be required to be seated except as necessary to make public comments or otherwise testify in the meeting. Additional restrictions could be implemented at the public hearing in accordance with any City policy issued between this meeting notice and the hearing. It is recommended that vaccinated persons also wear masks for their own wellbeing and that of City staff. Attendance will be monitored and limited once capacity is reached. Accessible street parking and an accessible entrance on Central Avenue is available to access the meeting.

### **PUBLIC COMMENTS**

Any individual, group, or agency may submit written comments on the Section 108 application and ESG-CV ERR to the City of Cincinnati's Community Development Administrator. All comments received by September 30, 2021 will be considered by the City of Cincinnati prior to authorizing submission of the Section 108 application and a Request for Release Of Funds. Written comments may be submitted to [Aisha.Tzillah@cincinnati-oh.gov](mailto:Aisha.Tzillah@cincinnati-oh.gov) or to City of Cincinnati, 805 Central Avenue Suite 700, Cincinnati, Ohio 45202 to the attention of Aisha Tzillah, Community Development Administrator, or faxed to (513) 352-6123.

### **ENVIRONMENTAL CERTIFICATION**

The City of Cincinnati certifies to HUD that Aisha Tzillah, Responsible Entity's Certifying Officer, in this individual's capacity as City of Cincinnati Community Development Administrator, consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and

that these responsibilities have been satisfied. HUD's Ohio's approval of the certification satisfies its responsibilities under the National Environmental Policy Act of 1969 (NEPA), and related laws and authorities and allows the City of Cincinnati, Ohio to use the Emergency Solutions Grant – Coronavirus Aid, Relief and Economic Security Act (ESG-CV) and Community Development Block Grant – Section 108 funds.

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and to ask questions prior to the hearing. No decision on the application will be made at the pre hearing conference. Questions and concerns should be directed to the Historic Conservation Office:

Beth Johnson  
805 Central Ave, Suite 500  
Cincinnati, Ohio 45202  
513 352 4848

[Urban.conservator@cincinnati-oh.gov](mailto:Urban.conservator@cincinnati-oh.gov)

**NOTICE OF A PUBLIC HEARING  
BEFORE THE HISTORIC  
CONSERVATION BOARD  
II CENTENNIAL PLAZA  
805 CENTRAL AVENUE, 5TH FLOOR**

CASE NUMBER: COA2021040  
SUBJECT PROPERTY: 2 ANNWOOD LN  
BOARD HEARING: HISTORIC  
CONSERVATION BOARD  
HEARING DATE: 09 27 2021 at 3:00 PM  
HEARING LOCATION: To comply with social distancing, this hearing will be conducted through a virtual platform. Please visit [www.cincinnati-oh.gov/boards](https://cincinnati-oh.webex.com/meet/beth.johnson) regarding procedures and rules for participation  
PRE HEARING DATE: 09 08 2021 at 9:00am  
PRE HEARING LOCATION: To comply with social distancing, this hearing will be conducted through a virtual platform at <https://cincinnati-oh.webex.com/meet/beth.johnson>  
APPLICANT: PLATTE ARCHITECTURE AND DESIGN  
REFERENCE REQUEST: The applicant requests a Certificate of Appropriateness to construct a three story rear addition on an existing residential structure, including a garage, living area and roof deck in the East Walnut Hills Historic District. Additionally, the applicant requests zoning relief related to side yard setbacks.

CASE NUMBER: COA2021041  
SUBJECT PROPERTY: 40 E COURT ST  
BOARD HEARING: HISTORIC  
CONSERVATION BOARD  
HEARING DATE: 09 27 2021 at 3:00 PM  
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APPLICANT: ABC SIGNS  
REFERENCE REQUEST: The applicant requests a Certificate of Appropriateness to install an illuminated commercial sign in the Court Street Historic District. Additionally, the applicant requests zoning relief related to location of the sign.

CASE NUMBER: COA2021042  
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CONSERVATION BOARD  
HEARING DATE: 09 27 2021 at 3:00 PM  
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CASE NUMBER: COA2021043  
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CASE NUMBER: COA2021044  
SUBJECT PROPERTY: 2 HUST AL  
BOARD HEARING: HISTORIC  
CONSERVATION BOARD  
HEARING DATE: 09 27 2021 at 3:00 PM  
HEARING LOCATION: To comply with social distancing, this hearing will be conducted through a virtual platform. Please visit [www.cincinnati-oh.gov/boards](https://cincinnati-oh.gov/boards) regarding procedures and rules for participation  
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PRE HEARING LOCATION: To comply with social distancing, this hearing will be conducted through a virtual platform at <https://cincinnati-oh.webex.com/meet/beth.johnson>  
APPLICANT: PATRICIA BITTNER  
REFERENCE REQUEST: The applicant requests a Certificate of Appropriateness to rehabilitate an existing two family structure, including window and door replacement, and new roof deck in the Over the Rhine Historic District

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805 Central Ave, Suite 500  
Cincinnati, Ohio 45202  
513 352 4848

[Urban.conservator@cincinnati-oh.gov](mailto:Urban.conservator@cincinnati-oh.gov)

**CITY OF CINCINNATI  
2020 – 2024 CONSOLIDATED  
PLAN, 2021 ANNUAL ACTION  
PLAN SECTION 108 APPLICATION  
AND 2022 ANNUAL ACTION PLAN  
PROGRAM PRIORITIES**

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RELEASE OF FUNDS**

The City of Cincinnati administers federal

funds from the U.S. Department of Housing and Urban Development (HUD). Pursuant to the City's HUD-approved 2020 – 2024 Consolidated Plan and 2021 Annual Action Plan, on or about September 30, 2021 the City will submit a Section 108 application establishing up to a \$34 Million loan pool. The loan pool will be used to provide gap financing for eligible affordable housing projects which meet local goals and HUD National Objectives. Prospective projects will vary in size and scope, with funds being used for, but not limited to, projects in the following categories: predevelopment financing, real property acquisition financing, housing rehabilitation financing, Low-Income Housing Tax Credit equity bridge financing, and eligible development activities undertaken by a federally compliant community-based development organization. At this time, no program income is anticipated to be generated from this program. The City will receive public comments on the draft application at a public hearing on September 14, 2021 at 4:00 pm. The meeting will be held at City administrative offices in Centennial II Building, 805 Central Avenue, 7th floor, Cincinnati, Ohio 45202. The 2020-2024 Consolidated Plan/2021 Action Annual Plan and Section 108 draft application can be reviewed at <https://www.cincinnati-oh.gov/community-development/hud-entitlement-grant-submissions/>, or by contacting Aisha Tzillah via e-mail at Aisha.Tzillah@Cincinnati-Oh.gov. Following agency approval of the final CDBG Section 108 loan application, the City will submit further request to HUD for the release of funds as projects are approved.

The City of Cincinnati also receives annual funding from HUD to support programs that address community needs. Public comments will be solicited to identify and prioritize community needs for use of HUD funding for calendar year 2022. A survey has been prepared to facilitate collection of community feedback by individuals who live or work in the City of Cincinnati. The survey may be accessed at [https://www.surveymonkey.com/r/cincinnati-speaks\\_2021](https://www.surveymonkey.com/r/cincinnati-speaks_2021). The survey will be available to the public until January 31, 2022. Written comments may also be submitted to Aisha.Tzillah@Cincinnati-Oh.gov or to City of Cincinnati, 805 Central Avenue Suite 700, Cincinnati, Ohio 45202 to the attention of Aisha Tzillah, Community Development Administrator, no later than January 31, 2022 to be included in a submission of

written comments to HUD.

Also, on or about September 20, 2021 the City of Cincinnati will submit a request to HUD, the administering agency, for the release of Emergency Solutions Grant – Coronavirus Aid, Relief and Economic Security Act (ESG-CV) funds under Title 1 of the Housing and Community Development Act of 1974 (PL 93-383), as amended, to undertake the projects for the purpose of, as permitted by the CARES Act, renovation (including major rehabilitation and conversion) of real property into temporary emergency shelters in response to prevent, prepare for, and respond to the epidemic.

The activities proposed in the program have been reviewed to determine the level of environmental review required and have been determined to be categorically excluded per 24 CFR 58.35(a) and subject to 24 CFR 58.5; all projects will receive a further case-by-case review for compliance with applicable historic, floodplain, coastal barrier, runway protection zone, noise pollution, and air pollution regulations before funds are released to the specific activity. An Environmental Review Record (ERR) that documents the environmental determinations for the projects will be maintained on file at the City of Cincinnati Department of Community and Economic Development, 805 Central Avenue Suite 700, Cincinnati, Ohio 45202 and may be examined or copied weekdays 9 a.m. through 4 p.m. The ERR may be requested via electronic-mail at [Aisha.Tzillah@cincinnati-oh.gov](mailto:Aisha.Tzillah@cincinnati-oh.gov) or via phone at (513) 352-6146. Hard copies and / or electronic copies will be sent as requested.

#### **COVID Meeting Protocols**

Due to COVID-related safety measures currently in place at City Hall and City administrative offices, any members of the public not fully vaccinated are required to wear masks and socially distance at least six feet away from others while inside City facilities. All members of the public will be required to be seated except as necessary to make public comments or otherwise testify in the meeting. Additional restrictions could be implemented at the public hearing in accordance with any City policy issued between this meeting notice and the hearing. It is recommended that vaccinated persons also wear masks for their own wellbeing and that of City staff. Attendance will be monitored and limited once capacity is reached. Accessible street parking and an

accessible entrance on Central Avenue is available to access the meeting.

#### **PUBLIC COMMENTS**

Any individual, group, or agency may submit written comments on the Section 108 application and ESG-CV ERR to the City of Cincinnati's Community Development Administrator. All comments received by September 30, 2021 will be considered by the City of Cincinnati prior to authorizing submission of the Section 108 application and a Request for Release Of Funds. Written comments may be submitted to [Aisha.Tzillah@cincinnati-oh.gov](mailto:Aisha.Tzillah@cincinnati-oh.gov) or to City of Cincinnati, 805 Central Avenue Suite 700, Cincinnati, Ohio 45202 to the attention of Aisha Tzillah, Community Development Administrator, or faxed to (513) 352-6123.

#### **ENVIRONMENTAL CERTIFICATION**

The City of Cincinnati certifies to HUD that Aisha Tzillah, Responsible Entity's Certifying Officer, in this individual's capacity as City of Cincinnati Community Development Administrator, consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's Ohio's approval of the certification satisfies its responsibilities under the National Environmental Policy Act of 1969 (NEPA), and related laws and authorities and allows the City of Cincinnati, Ohio to use the Emergency Solutions Grant – Coronavirus Aid, Relief and Economic Security Act (ESG-CV) and Community Development Block Grant – Section 108 funds.

#### **PUBLIC ANNOUNCEMENT**

Pursuant to Section 117.38 of the Ohio Revised Code, the City of Cincinnati has completed and filed with the Auditor of State the annual regulatory cash basis financial report for the City's Health District, the Cincinnati Health Department, for the fiscal year ended June 30, 2021.

The report is available at the office of the Finance Director, 801 Plum Street, Room 250, Cincinnati, OH 45202.

**2020 – 2024 CONSOLIDATED PLAN'S  
2022 ANNUAL ACTION PLAN AND  
2021 CONSOLIDATED ANNUAL  
PERFORMANCE AND EVALUATION  
REPORT**

**PUBLIC MEETING NOTICE**

**City of Cincinnati**

**Community Development Advisory  
Board Meeting**

**Monday, March 7, 2022, 5 – 6 PM**

Via Zoom Meeting: <https://bit.ly/3uZf72R>

Meeting ID: 878 3680 3168

Passcode: 914702

Call in number: (301) 715-8592

A public meeting will be held via Zoom regarding the City's 2020 – 2024 Consolidated Plan's 2022 Annual Action Plan and the 2021 Consolidated Annual Performance and Evaluation Report. The City administers federal funds from the U.S. Department of Housing and Urban Development (HUD): Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons With HIV/AIDS (HOPWA). There are a total of 33 different programs to improve the quality of life, eliminate slum and blight, conduct workforce development activities, create jobs and assist businesses, create, renovate, and facilitate access to housing, and benefit moderate to low income areas and residents. The programs and calendar year 2021 accomplishments will be presented to the Community Development Advisory Board (CDAB). CDAB will provide priority recommendations considered when allocating funds to the programs for 2022. Also, the stimulus funding for ESG-Coronavirus Aid, Relief, and Economic Security (CARES), HOPWA-CARES, CDBG-CARES, and HOME – American Rescue Plan (ARP) will be presented and discussed.

The 2020 – 2024 Consolidated Plan's reports can be viewed on the City's Web site at the following URL:

<https://www.cincinnati-oh.gov/community-development/hud-entitlement-grant-submissions/>

To provide comments with regards to the City's HUD funded programs, written comments may be submitted to [aisha.tzillah@cincinnati-oh.gov](mailto:aisha.tzillah@cincinnati-oh.gov) or to City of Cincinnati, 801 Plum Street SSuite 104, Cincinnati, Ohio 45202 to the attention of Aisha Tzillah, Community

Development Administrator, no later than March 25, 2022 to be included in a submission of written public comments to HUD.

**NOTICE OF COUNCIL/COMMITTEE MEETINGS**

Beginning on Monday, April 19, 2021 City Council Chambers will be open to the public for the limited purpose of attending City Council and Council committee meetings. The City will enforce maximum capacity restrictions for in-person participation in accordance with ongoing COVID-19 protocols. Members of the public are encouraged to continue to provide public comment and participate in Council meetings remotely via Zoom

Due to COVID-related safety measures in place at City Hall, members of the public attending a Council meeting or Council committee meeting in person who are not fully vaccinated will be required to wear masks and socially distance at least six feet away from others while inside City Hall and in Council Chambers. The public will be required to be seated and masked, if not fully vaccinated, except as necessary to make public comments or otherwise testify in the meeting at the request of Council or the Council committee. City Hall security staff will monitor attendance and limit entry to City Hall once capacity is reached.

This meeting can be watched in real time on CitiCable or by livestreaming the meeting at [www.cincinnati-oh.gov](http://www.cincinnati-oh.gov). Members of the public may also register to appear at the meeting via Zoom at [www.cincinnati-oh.gov/council/public-speakers-registration](http://www.cincinnati-oh.gov/council/public-speakers-registration), and they may submit written comments and questions to City Council by email at [clerkofcouncil@cincinnati-oh.gov](mailto:clerkofcouncil@cincinnati-oh.gov). All meeting registrations, comments, and questions must be received no later than 2pm (EST) on the day prior to the meeting, except that registrations, comments, and questions concerning a public hearing item will be accepted if received by 9am (EST) on the day of the hearing. Please note that the failure to timely register or to timely submit a comment or question may result in your inability to participate in the meeting or to have your comment or question considered at the meeting.

**LEGAL NOTICE - BIDS WANTED  
DEPARTMENT OF FINANCE/PURCHASING DIVISION**

**GENERAL REQUIREMENTS**

Sealed proposals for furnishing the materials, supplies, equipment or services, for the repair, construction or improvements, as indicated by the items hereunder listed and in accordance with the applicable specifications will be received at the office of the City Purchasing Agent, Two Centennial Plaza, Suite 234, 805 Central Avenue, Cincinnati, Ohio 45202, where they will be opened and publicly read aloud.

Current invitations for bids and proposals are now posted and available for download at <https://data.cincinnati-oh.gov/browse?category=Fiscal+Sustainability+Strategic+Investment>.



Persons with standing, their representatives and witnesses, and members of the public will be provided virtual and in-person access to public hearings as provided below. If you would like to participate in or view an upcoming hearing, please carefully review the following instructions. Please note that persons with standing, other than the applicant and/or owner, must submit a written request no less than 48 hours in advance of a public hearing to gain access to the hearing.

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**NOTICE OF A PUBLIC HEARING  
BEFORE THE HISTORIC  
CONSERVATION BOARD  
II CENTENNIAL PLAZA  
805 CENTRAL AVENUE, 5TH FLOOR**

CASE NUMBER: COA2022003  
SUBJECT PROPERTY: 1808 ELM ST  
BOARD HEARING: HISTORIC  
CONSERVATION BOARD  
HEARING DATE: 03 14 2022 at 3:00 PM  
HEARING LOCATION: This hearing will be conducted using video-conferencing technology. Please visit [www.cincinnati-oh.gov/boards](http://www.cincinnati-oh.gov/boards) regarding procedures and rules for participation  
PRE HEARING DATE: 02 23 2022 at 9:00am  
PRE HEARING LOCATION: This pre-hearing will be conducted using video-conferencing technology. Please visit <https://cincinnati-oh.webex.com/meet/beth.johnson>  
APPLICANT: PLATTE ARCHITECTURE AND DESIGN  
REFERENCE REQUEST: The applicant requests a Certificate of Appropriateness to rehabilitate an existing structure for mixed use purposes, including new storefront, construction of a roof deck, window replacement and the addition of residential units on the top two floors in the Over the Rhine Historic District.

The Board has the duty to provide notice of its hearing postmarked at least seven days in advance of the hearing to all property owners located within two hundred feet of the boundaries of the Subject Property, as per Cincinnati Zoning Code §1435 09 1 E. The purpose of the pre hearing conference is to provide interested parties with an opportunity to review the project and to ask questions prior to the hearing. No decision on the application will be made at the pre hearing conference. Questions and concerns should be directed to

the Historic Conservation Office:

Beth Johnson  
805 Central Ave, Suite 500  
Cincinnati, Ohio 45202  
513 352 4848

[Urban.conservator@cincinnati-oh.gov](mailto:Urban.conservator@cincinnati-oh.gov)

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**NOTICE OF A PUBLIC HEARING  
BEFORE THE HISTORIC  
CONSERVATION BOARD  
II CENTENNIAL PLAZA  
805 CENTRAL AVENUE, 5TH FLOOR**

CASE NUMBER: COA2022004  
SUBJECT PROPERTY: 548 E 13TH ST  
BOARD HEARING: HISTORIC  
CONSERVATION BOARD  
HEARING DATE: 03 28 2022 at 3:00 PM  
HEARING LOCATION: This hearing will be conducted using video-conferencing technology. Please visit [www.cincinnati-oh.gov/boards](http://www.cincinnati-oh.gov/boards) regarding procedures and rules for participation  
PRE HEARING DATE: 03 09 2022 at 9:00am  
PRE HEARING LOCATION: This pre-hearing will be conducted using video-conferencing technology. Please visit <https://cincinnati-oh.webex.com/meet/beth.johnson>  
APPLICANT: STEVEN HAMPTON  
REFERENCE REQUEST: The applicant requests a Certificate of Appropriateness to construct a single story garage addition and brick privacy wall in the Over The Rhine Historic District. Additionally, the applicant requests zoning relief related to side and rear yard setbacks, and the height and opacity of the wall.

The Board has the duty to provide notice of its hearing postmarked at least seven days in advance of the hearing to all property owners located within two hundred feet of the boundaries of the Subject Property, as per Cincinnati Zoning Code §1435 09 1 E. The purpose of the pre hearing conference is to provide interested parties with an opportunity to review the project and to ask questions prior to the hearing. No decision on the application will be made at the pre hearing conference. Questions and concerns should be directed to the Historic Conservation Office:

Beth Johnson  
805 Central Ave, Suite 500  
Cincinnati, Ohio 45202  
513 352 4848

[Urban.conservator@cincinnati-oh.gov](mailto:Urban.conservator@cincinnati-oh.gov)

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**PUBLIC ANNOUNCEMENT**

Pursuant to Section 117.38 of the Ohio Revised Code, the City of Cincinnati's 2021 Annual Comprehensive Financial Report (ACFR) has been completed and filed with the Auditor of State.

The report is available at the office of the Finance Director, room 250, City Hall or on our website at:

<https://www.cincinnati-oh.gov/finance/financialreports/>

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**2020 – 2024 CONSOLIDATED PLAN'S  
2022 ANNUAL ACTION PLAN AND  
2021 CONSOLIDATED ANNUAL  
PERFORMANCE AND EVALUATION  
REPORT**

**PUBLIC MEETING NOTICE**

**City of Cincinnati  
Community Development Advisory  
Board Meeting  
Monday, March 7, 2022, 5 – 6 PM**  
Via Zoom Meeting: <https://bit.ly/3uZf72R>  
Meeting ID: 878 3680 3168  
Passcode: 914702  
Call in number: (301) 715-8592

A public meeting will be held via Zoom regarding the City's 2020–2024 Consolidated Plan's 2022 Annual Action Plan and the 2021 Consolidated Annual Performance and Evaluation Report. The City administers federal funds from the U.S. Department of Housing and Urban Development (HUD): Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons With HIV/AIDS (HOPWA). There are a total of 33 different programs to improve the quality of life, eliminate slum and blight, conduct workforce development activities, create jobs and assist businesses, create, renovate, and facilitate access to housing, and benefit moderate to low income areas and residents. The programs and calendar year 2021 accomplishments will be presented to the Community Development Advisory Board (CDAB). CDAB will provide priority recommendations considered when allocating

funds to the programs for 2022. Also, the stimulus funding for ESG-Coronavirus Aid, Relief, and Economic Security (CARES), HOPWA-CARES, CDBG-CARES, and HOME – American Rescue Plan (ARP) will be presented and discussed.

The 2020 – 2024 Consolidated Plan's reports can be viewed on the City's Web site at the following URL:

<https://www.cincinnati-oh.gov/community-development/development-grant-submissions/>

To provide comments with regards to the City's HUD funded programs, written comments may be submitted to [aisha.tzillah@cincinnati-oh.gov](mailto:aisha.tzillah@cincinnati-oh.gov) or to City of Cincinnati, 801 Plum Street Suite 104, Cincinnati, Ohio 45202 to the attention of Aisha Tzillah, Community Development Administrator, no later than March 25, 2022 to be included in a submission of written public comments to HUD.

#### **2022 NEIGHBORHOOD SUMMIT: REGISTRATION OPEN!**

The City of Cincinnati's Department of City Planning and Engagement is happy to share that Invest in Neighborhoods has opened up registration for this year's Neighborhood Summit to be held on March 12, 2022 at Woodward High School. Please visit <https://www.investinneighborhoods.org/neighborhood-summit/> in order to register and learn more about the event!

2022 Neighborhood Summit  
Registration Open  
Deadline March 1, 2022

**2022 Neighborhood Summit  
Leadership for the Future  
in partnership with Cincinnati Public  
Schools  
Saturday March 12, 2022  
Woodward High School**

Leadership comes from many places and in many forms. This Summit will highlight the people, projects, programs, and partnerships that take us into the future. Areas will include youth leadership, grass roots leadership, and new leadership; leadership at the municipal, organizational, or individual level; and projects and programs that take us, our neighborhoods, and our city into the future.

Registration open until March 1

[Click here for program and registration](#)

Want to submit an idea for the Policy Pitch to the City Committees?  
open until Feb 28

[Submit Policy Pitch idea](#)

Want to share your thoughts on priorities with Mayor Pureval?  
Open until Feb 28

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## **LEGAL NOTICE - BIDS WANTED DEPARTMENT OF FINANCE PURCHASING DIVISION**

### **GENERAL REQUIREMENTS**

Sealed proposals for furnishing the materials, supplies, equipment or services, for the repair, construction or improvements, as indicated by the items hereunder listed and in accordance with the applicable specifications will be received at the office of the City Purchasing Agent, Two Centennial Plaza, Suite 234, 805 Central Avenue, Cincinnati, Ohio 45202, where they will be opened and publicly read aloud.

Current invitations for bids and proposals are now posted and available for download at <https://data.cincinnati-oh.gov/browse?category=Fiscal+Sustainability+Strategic+Investment>.

## Tzillah, Aisha

---

**From:** Tzillah, Aisha  
**Sent:** Tuesday, February 22, 2022 12:30 PM  
**To:** Tzillah, Aisha  
**Subject:** Community Development Advisory Board meeting notification

Hello:

A meeting of the Community Development Advisory Board (CDAB) is scheduled for Monday, March 7<sup>th</sup> from 5:00 – 6:00 pm. This meeting will be conducted via Zoom, and topics will include the City's 2020 – 2024 Consolidated Plan's 2022 Annual Action Plan and the 2021 Consolidated Annual Performance and Evaluation Report.

The City administers federal funds from the U.S. Department of Housing and Urban Development (HUD): Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons With HIV/AIDS (HOPWA). There are a total of 33 different programs to improve the quality of life, eliminate slum and blight, conduct workforce development activities, create jobs and assist businesses, create, renovate, and facilitate access to housing, and benefit moderate to low-income areas and residents. The programs and calendar year 2021 accomplishments will be presented to the Community Development Advisory Board (CDAB). CDAB will provide priority recommendations considered when allocating funds to the programs for 2022. Also, the stimulus funding for ESG-Coronavirus Aid, Relief, and Economic Security (CARES), HOPWA-CARES, CDBG-CARES, and HOME – American Rescue Plan (ARP) will be presented and discussed.

Due to issues reasonably connected to Ohio Department of Health orders or guidance concerning COVID-19, members of the City Administration may be required to participate remotely. The manner of remote participation shall otherwise comply with all requirements of the Open Meetings Act. Remote viewing for the meeting can be accessed at the following URL:

Zoom Meeting: <https://bit.ly/3uZf72R>

Meeting ID: 878 3680 3168

Passcode: 914702

Call in number: (301) 715-8592

The 2020 – 2024 Consolidated and prior Action Plans and Consolidated Annual Performance and Evaluation Reports can be viewed on the City's Web site at the following URL:

<https://www.cincinnati-oh.gov/community-development/hud-entitlement-grant-submissions/>

To provide comments with regards to the City's HUD funded programs, written comments may be submitted to [aisha.tzillah@cincinnati-oh.gov](mailto:aisha.tzillah@cincinnati-oh.gov) or to City of Cincinnati, 801 Plum Street, Suite 104, Cincinnati, Ohio 45202 to the attention of Aisha Tzillah, Community Development Administrator, no later than March 25, 2022 to be included in a submission of written public comments to HUD.

Please feel free to attend as well as forward the invite to those who may be interested.

Aisha.Tzillah@cincinnati-oh.gov is inviting you to a scheduled Zoom meeting.

Topic: Community Development Advisory Board Meeting

Time: Mar 7, 2022 05:00 PM Eastern Time (US and Canada)

Join Zoom Meeting

<https://cincinnati-oh.zoom.us/j/87836803168?pwd=R3hSOXJPVHYyYWZqSk1ZL3lOMmpMdz09>

<https://bit.ly/3uZf72R>

Meeting ID: 878 3680 3168

Passcode: 914702

One tap mobile

+19292056099,,87836803168# US (New York)

+13017158592,,87836803168# US (Washington DC)

Dial by your location

+1 929 205 6099 US (New York)

+1 301 715 8592 US (Washington DC)

+1 312 626 6799 US (Chicago)

+1 669 900 6833 US (San Jose)

+1 253 215 8782 US (Tacoma)

+1 346 248 7799 US (Houston)

Meeting ID: 878 3680 3168

Find your local number: <https://cincinnati-oh.zoom.us/j/kcgBwrFQ4U>



# CINCINNATI SPEAKS!

City of Cincinnati *HUD Annual Action Plan*

We're looking for your input  
on the City's **Annual Action Plan**.

Tell us your community's priorities  
and where you think we should  
spend federal funds from the U.S.  
Department of Housing and Urban  
Development (HUD).



Scan the QR Code above or visit:  
[www.surveymonkey.com/r/Cincinnati\\_speaks\\_2021](http://www.surveymonkey.com/r/Cincinnati_speaks_2021)

Post Sept 8, 2021

(Verbiage)

The **Cincinnati Speaks! Survey** is LIVE and ready for your input. The City receives annual funding from the U.S. Department of Housing and Urban Development to support community needs, so we are asking for your input on what your community's priority needs are this year, to take into consideration for next year. If you live and/or work in Cincinnati, please consider filling out this anonymous survey that should take less than 2 minutes to complete:

[https://www.surveymonkey.com/r/Cincinnati\\_speaks\\_2021](https://www.surveymonkey.com/r/Cincinnati_speaks_2021) or by QR Code:



Post Sept 8, 2021



choosecincy\_dced



[View Insights](#)



choosecincy\_dced The Cincinnati Speaks Survey is LIVE and ready for your input! The City receives annual funding from the U.S. Department of Housing and Urban Development to support Community needs. If you live and/or work in Cincinnati, please complete this anonymous survey that takes less than 2 minutes to complete:  
[https://www.surveymonkey.com/r/Cincinnati\\_speaks\\_2021](https://www.surveymonkey.com/r/Cincinnati_speaks_2021)

Instagram post 9/8/2021

Post Sept 8, 2021



City of Cincinnati Department of Community & Economic Development

Published by Choose Cincy · Just now ·



The Cincinnati Speaks Survey is LIVE and ready for your input. The City receives annual funding from the U.S. Department of Housing and Urban Development to support community needs, so we are asking for your input on what your community's priority needs are this year, to take into consideration for next year. If you live and/or work in Cincinnati, please consider filling out this anonymous survey that should take less than 2 minutes to complete:

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Facebook Post 9/8/2021

Post Sept 8, 2021



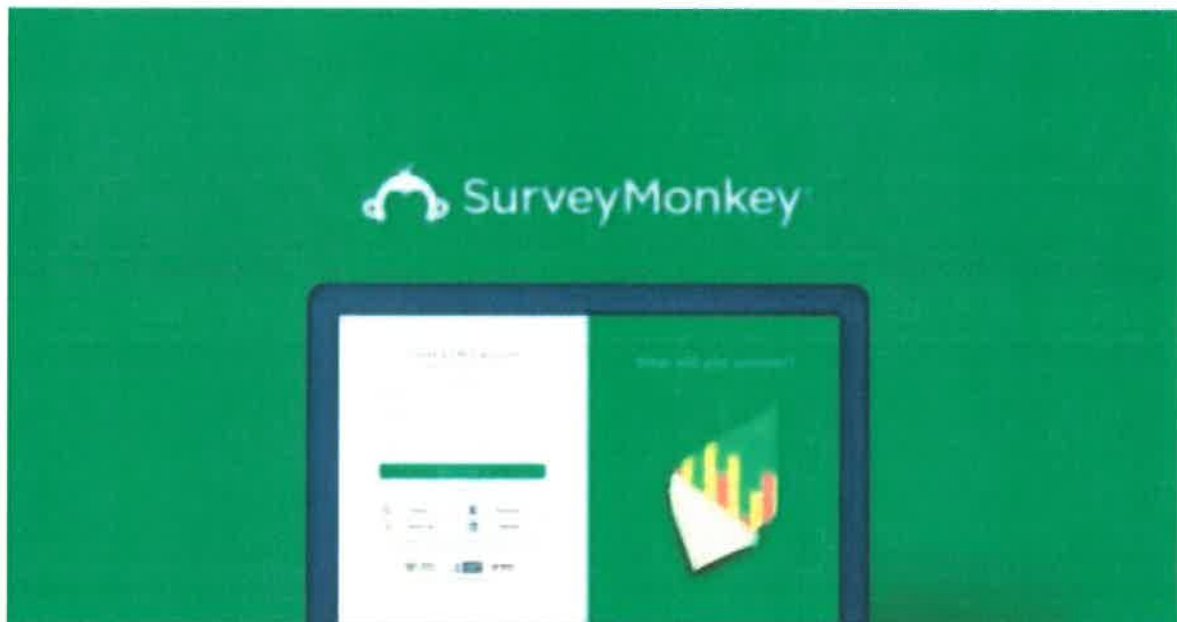
**City of Cincinnati Community and Economic Development**

Economic Development Division at City of Cincinnati

now •



The Cincinnati Speaks Survey is LIVE and ready for your input. The City receives annual funding from the U.S. Department of Housing and Urban Development to support community needs, so we are asking for your input on what yo ...see more



**Cincinnati Speaks!**

[surveymonkey.com](https://surveymonkey.com) • 1 min read



LinkedIn Post 9/8/2021

Post Sept 8, 2021

Tweets

Tweets & replies

Media

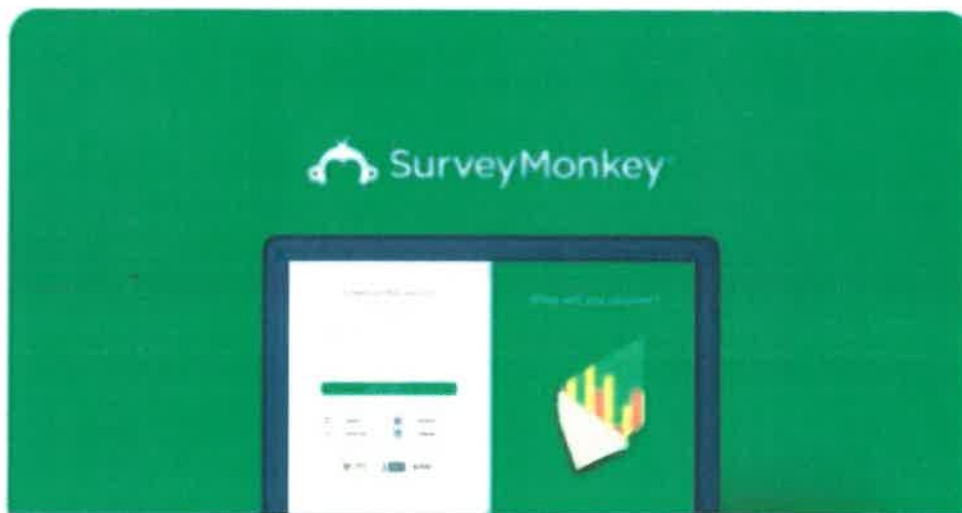
Likes



**Choosecincy** @choosecincy · 10s

...

The Cincinnati Speaks Survey is LIVE and ready for your input. We are asking for your input on what your community's priority needs are this year. If you live and/or work in Cincinnati, please fill out the 2-minute survey.



[surveymonkey.com](https://surveymonkey.com)

**Cincinnati Speaks!**

Take this survey powered by [surveymonkey.com](https://surveymonkey.com). Create your own surveys for free.



Twitter post 9/8/2021



About Business Expansion Real Estate Development

Neighborhood Services Homeowner/Renter Assistance Oversight Q

# Community Development Advisory Board Meeting (CDAB)

Home / Community Development Advisory Board Meeting (CDAB)

## Community Development Advisory Board Meeting (CDAB)

March 7 @ 5:00 pm - 6:00 pm

A meeting of the Community Development Advisory Board (CDAB) is scheduled for **Monday, March 7, 2022 from 5:00 – 6:00 pm**. This meeting will be conducted via Zoom, and topics will

include the City's 2020 – 2024 Consolidated Plan's 2022 Annual Action Plan and the 2021 Consolidated Annual Performance and Evaluation Report.

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**Passcode: 914702**

**Call in number: (301) 715-8592**

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Please feel free to attend as well as forward the invite to those who may be interested.



+ Google Calendar

+ Add to iCalendar

Share This Story, Choose Your Platform!



[Warsaw Creative Campus-Bidding Opportunities](#)

DEPARTMENT OF COMMUNITY & ECONOMIC  
DEVELOPMENT

Two Centennial Plaza  
805 Central Avenue Suite 700  
Cincinnati, OH 45202

416.1.752.6116  
edinfo@cincinnati-oh.gov  
@CincinnatiOH  
#CincinnatiOHgov

Friday, June 3, 2022, 2:45 PM  
City Hall Room 115, Teams meeting

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## Agenda

1. Welcome and Introductions
2. Entitlement budget – ordinances set for next week
3. Budget project delivery approximate 10% – including staff time, environmental reviews, law, other
4. Timeliness / monitoring – invoicing / ID billing every 2 months
5. CDBG Manual / Subrecipient Monitoring
6. Process Improvements CY2022
  - a. Annual budgeting process forthcoming
  - b. Grants based accounting
  - c. Sunset process
  - d. HEROS – on-line environmental review process
  - e. Engaging OPDA for assistance with strategic plan, surveys

**Attendees:**

**Ashlie Wilkson, City Planning**

**Rajesh Ranjit, Community and Economic Development**

**Dan Bower, Community and Economic Development**

**Grant Mussman, Cincinnati Health Department**

**Art Dahlberg, Buildings and Inspections**

**Samantha Brandenburg, City Solicitor's Office**

**Kaitlyn Geiger, City Solicitor's Office**

**Brian Gay, Office of Budget and Evaluation**

**Morgan Sutter, Office of the City Manager**

**Aisha Tzillah, Office of the City Manager**

**John McCafferty, Cincinnati Recreation Commission**

**Lathel Bryant, Cincinnati Recreation Commission**

**Missy McCarthy, Office of Budget and Evaluation**

**Virtual Attendees:**

**Debi Smith, Cincinnati Health Department**

**Alicia Reinersman, Office of Budget and Evaluation**

**Chelsea Ahting, Office of Budget and Evaluation**

**Mark Menkhaus, Cincinnati Health Department**

**Jeanette Shoecraft, Cincinnati Recreation Commission**

## **Community Development Advisory Board (CDAB)**

### **2022 Annual Action Plan and 2021 Consolidated Annual Performance and Evaluation Presentation**

Monday, March 7, 2022

Teams Virtual Meeting

#### **MEETING MINUTES**

##### **1. Meeting Start Date**

Meeting started at 4:05 PM with eight CDAB members in attendance.

##### **2. Members of the board who were present**

Jessica Powell (Chair)

Mike Cappel

Darrick Dansby

Rob Denham

Markiea Carter

Roy Hackworth

Vanessa Wong

Gina Marsh

##### **3. Members of the board who were absent**

N/A

##### **4. Public Attendees**

Jon Harmon

Sister Barbara Busch

Alex Horan-Jacobs

Jerry Carrico

Tiffany Stewart

Gus Ricksecker

Justin Halter

Dr. Maryse Amin

Erica Faaborg

Jeanette Shoecraft

Kevin Finn

Alicia Reinersman

Kira Palmer

## 5. Topics discussed by the board

The following is a list of the agenda topics:

1. Welcome and Introductions
2. Review of Federal Requirements
3. Public Participation Results for 2020 – 2024 Consolidated Plan and 2022 Annual Action Plan
4. Federal Grant Programs
  - a. Community Development Block Grant (CDBG)
  - b. HOME Investment Partnerships Program (HOME)
  - c. Emergency Solutions Grant (ESG)
  - d. Housing Opportunities for Persons With HIV/AIDS (HOPWA)
5. CDAB Ranking
6. Questions?
7. Adjourn

### Review of Federal Requirements:

A brief overview of the federal reporting requirements for 5-year Consolidated Plans, Annual Action Plans, and Consolidated Annual Performance and Evaluation Reports was provided. The 5-year performance of all established CDBG and HOME programs was presented. It was requested from CDAB members to indicate which programs are specifically focused on low-to moderate-income individuals.

### Public Participation Process:

A brief overview of the City of Cincinnati's HUD Entitlement Grant Program's Public Participation process was made. The overview included an explanation of the board's role, which is to make funding priorities for the City Manager to take into consideration when finalizing the HUD budgets. The public comment card was distributed and encouraged to be sent out to the community. The City collected public input until March 24, 2022. [https://www.surveymonkey.com/r/cincinnati\\_speaks\\_2021](https://www.surveymonkey.com/r/cincinnati_speaks_2021)

### Federal Grant Programs:

All programs were present by the following sections: Workforce Development, Supportive Services, Housing Development, and Non-Housing Development. Programs that directly assist low- to moderate-income individuals were indicated as well as programs that directly supported City staff.

### CDAB ranking:

All present members of the advisory board ranked the programs on paper.

6. Decisions made by the board

The next meeting is tentatively scheduled by the end of the calendar year in order to review the 2023 funding priority recommendations.

7. Recommendations from the board to be presented to the City Manager

The CDBG and HOME rankings will be taken into consideration for the funding distribution for the 2022 Annual Action Plan.

8. Comments received:

-Sister Barbara Busch – discussion re: ADDI, need for additional funding due to increased cost of mortgages and more need for homeownership in the City. There's been limited access due to the HOME income limits and her request is for additional funds plus more diverse funding sources to ensure broader access across income bands. She requested to for the ADDI program to receive \$1,000,000.

-Darrick indicated support for additional homeowner resources. Also wanted to ensure the City opens up funding to other groups and not the same entities (i.e. subrecipients) that it always uses so that new ideas or expertise can be brought in to our programs

9. Time meeting was adjourned

Meeting adjourned at 5:00 PM



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Community Development Advisory Board  
2022 Annual Action Plan and  
2021 Consolidated Annual Performance  
and Evaluation Report

March 7, 2022





# Agenda

## Community Development Advisory Board

- Welcome and Introductions / Public Meeting Overview
- Federal requirements
- Public Participation results
- Federal Grant Programs
  - Community Development Block Grant (CDBG)
  - HOME Investment Partnerships (HOME)
  - CDBG Coronavirus Aid, Relief, and Economic Security (CARES or CV)
  - Emergency Solutions Grant (ESG) and ESG-CV
  - Housing Opportunities for Persons With HIV/AIDS (HOPWA) and HOPWA-CV
  - HOME – American Rescue Plan (ARP)
- CDAB Ranking
- Adjourn

1



Emergency Solutions Grant (ESG) and Housing Opportunities for Persons with HIV/AIDS (HOPWA) are determined by different advisory boards.

## Public Meeting

### Community Development Advisory Board

- This is a Public Meeting
- Questions from CDAB throughout presentation – please raise hand
- All questions / comments from the public will occur at the end of the presentation
  - Please raise hand
  - Please keep questions / comments to 3 minutes
- To provide community feedback – the City will accept community ranking and comments until March 24<sup>th</sup>:

[https://www.surveymonkey.com/r/cincinnati\\_speaks\\_2021](https://www.surveymonkey.com/r/cincinnati_speaks_2021)



2

Emergency Solutions Grant (ESG) and Housing Opportunities for Persons with HIV/AIDS (HOPWA) are determined by different advisory boards.

## Federal Requirements


### Overview of Consolidated Plan

- City of Cincinnati is an **Entitlement Jurisdiction** as determined by **HUD**
- Federal allocations** based on community need, extent of poverty, population, housing over crowding, age of housing, population growth lag
- Consolidated Plan (2020 – 2024)** contains:
  - Community Needs Assessment
  - Housing Market Analysis
  - Strategic Plan (with 5-year benchmarks)
  - Furthering Fair Housing Assessment
- Annual Reporting**
  - Annual Action Plans (AAP)
    - Submitted yearly to allocate funding to the identified programs
  - Consolidated Annual Performance and Evaluation Reports (CAPER)

3

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HUD – U.S. Department of Housing and Urban Development

4 entitlement grant programs, HOME, ESG, HOPWA, CDBG

Con Plan - Framework for the City to identify housing homeless, special populations, and community and economic development needs and resources and tailor a strategic plan for meeting those needs

The Strategic Plan outlines programs and corresponding benchmarks to achieve over the 5 years. The Annual Action Plan allocates funding to the programs yearly.

Community participation is an integral part of each report and plan.

## Federal Grant Programs

### Overview of Entitlement Programs

- **Community Development Block Grant (CDBG)**
  - National Objectives: benefit low-moderate income individuals ( $\geq 70\%$ ); eliminate slum and blight ( $\leq 30\%$ ); or urgent need
  - Primary Objectives: decent housing, suitable living environments, expanded economic activity
  - 15% cap on public service activities (i.e. job training)
- **HOME Investment Partnerships Program (HOME)**
  - Affordable housing for low-income individuals
  - 15% CHDO development projects; 5% CHDO operating support, 15% Match
- **Emergency Solutions Grant (ESG)** – serves homeless population
- **Housing Opportunities for Persons With HIV/AIDS (HOPWA)**

4



#### 2021 Entitlement Awards:

CDBG: \$11,774,974

HOME: \$2,737,925

ESG: \$997,610

HOPWA: \$1,281,332

#### 2020 Stimulus CARES (Coronavirus Aid, Relief, and Economic Security)

CDBG-CV: \$9,106,648

ESG-CV: \$7,651,777

HOPWA-CV: \$166,072

#### 2021 American Rescue Plan

HOME-ARP: \$9,923,076

Several waivers were issued on certain federal requirements for the stimulus funding as well as for the entitlement programs

## Public Participation Process



5

Public Participation Results			
<a href="https://www.surveymonkey.com/r/cincinnati_speaks_2021">https://www.surveymonkey.com/r/cincinnati_speaks_2021</a>			
1	Homeless prevention and assistance (55%)	13	Legal assistance for tenants (27%)
2	Improving neighborhood business districts (50%)	14	Lower concentrations of poverty in neighborhoods (26%)
3	Affordable housing (46%)	15	Down payment assistance for first time homebuyers (25%)
4	Homeowner repair assistance for low-income persons (45%)	16	Operating support for CDCs (23%)
5	Housing repairs for the elderly / disabled (45%)	17	Building code violation enforcement (23%)
6	Historic building preservation (44%)	18	Mill Creek watershed improvement (23%)
7	Employment training for under- / non-employed (43%)	19	Childhood lead poisoning prevention (21%)
8	Converting vacant lots into pocket parks / urban gardens (42%)	20	Housing discrimination assistance (21%)
9	Youth and young adult job training program (37%)	21	Relocation assistance from dilapidated housing (19%)
10	Small business assistance and loans (29%)	22	Demolishing and barricading vacant / blighted buildings (17%)
11	Findlay market assistance (28%)	23	On-the-job construction training (16%)
12	Environmental cleanup of contaminated sites (27%)	24	Emergency mortgage assistance (13%)

Public participation results collected in CY 2021 for CY 2022's community priorities. Individuals selected up to 10 community priorities that reflected the established programs.

A total of 291 have participated in the survey

## Moderate to Low Income Limits

2021 Income Limits (changes annually)

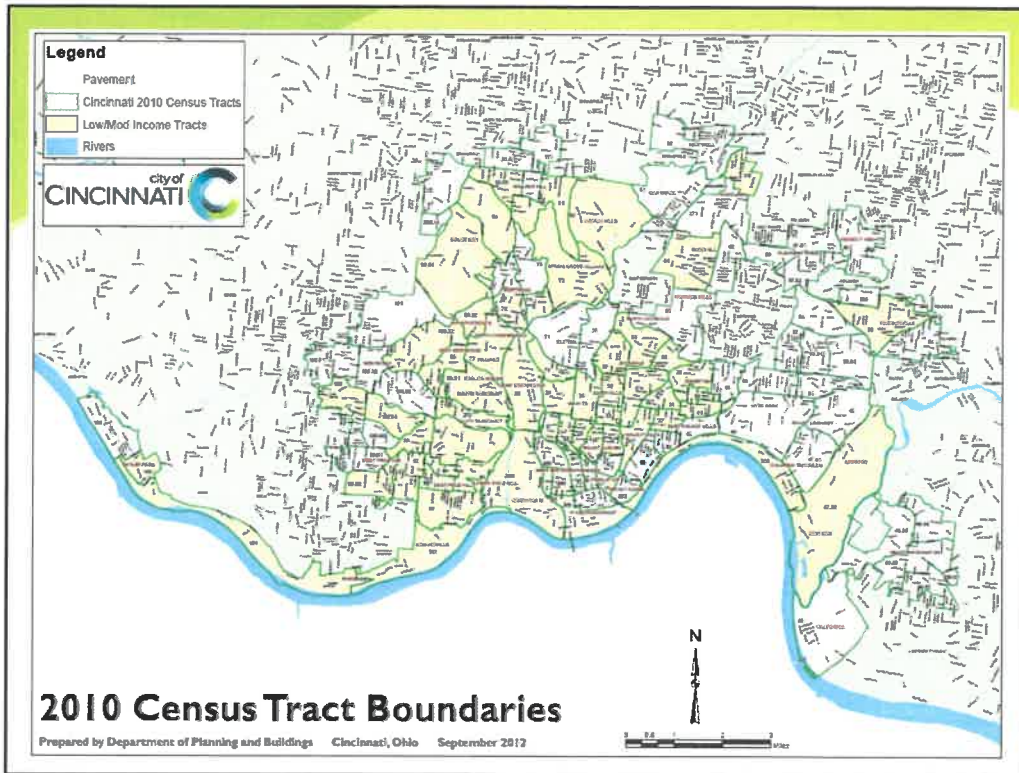
Income Level	1 Person	2 People	3 People	4 People	5 People
Extremely Low Income (30% AMI)	\$17,950	\$20,500	\$23,050	\$25,600	\$27,650
Very Low Income (50% AMI)	\$29,900	\$34,200	\$38,450	\$42,700	\$46,150
Low Income (60% AMI)	\$35,880	\$41,040	\$46,140	\$51,240	\$55,380
Moderate Income (80% AMI)	\$47,850	\$54,650	\$61,500	\$68,300	\$73,800

Source: <http://www.hud.gov>

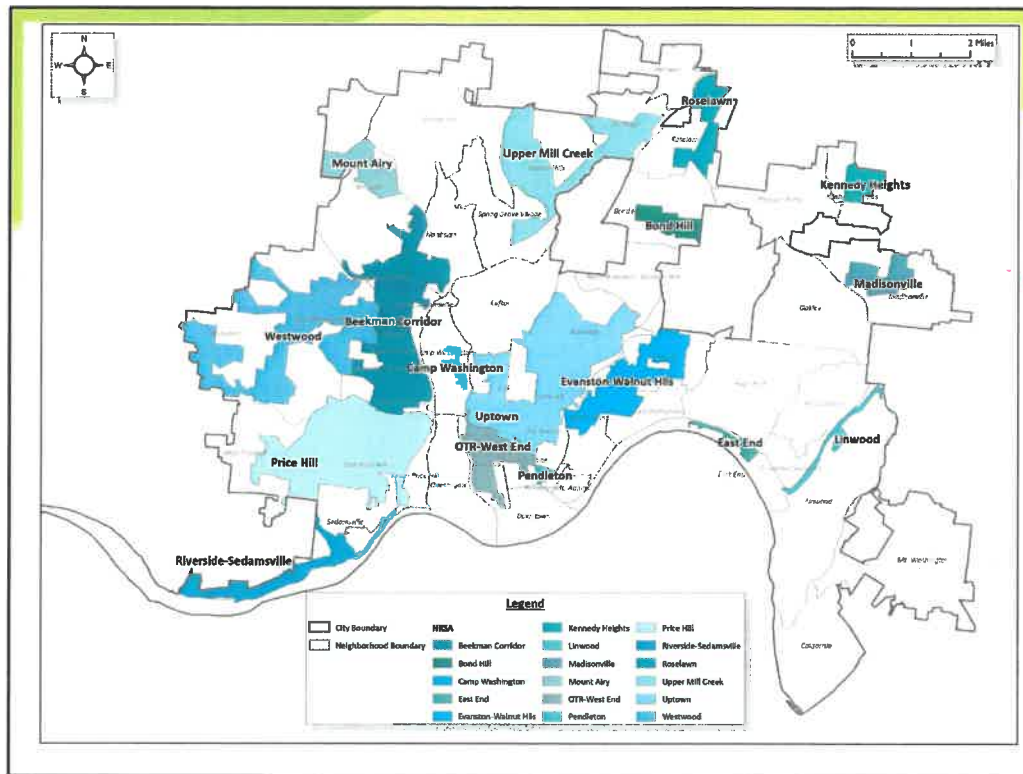


The focus of the City's federal grant programs is to support our moderate to low income population, meaning individuals and families whose income is at 80% of the area's median income (AMI) or lower. Different programs have specific income requirements but all are aimed at 80% AMI or lower. Coined "low-mod".

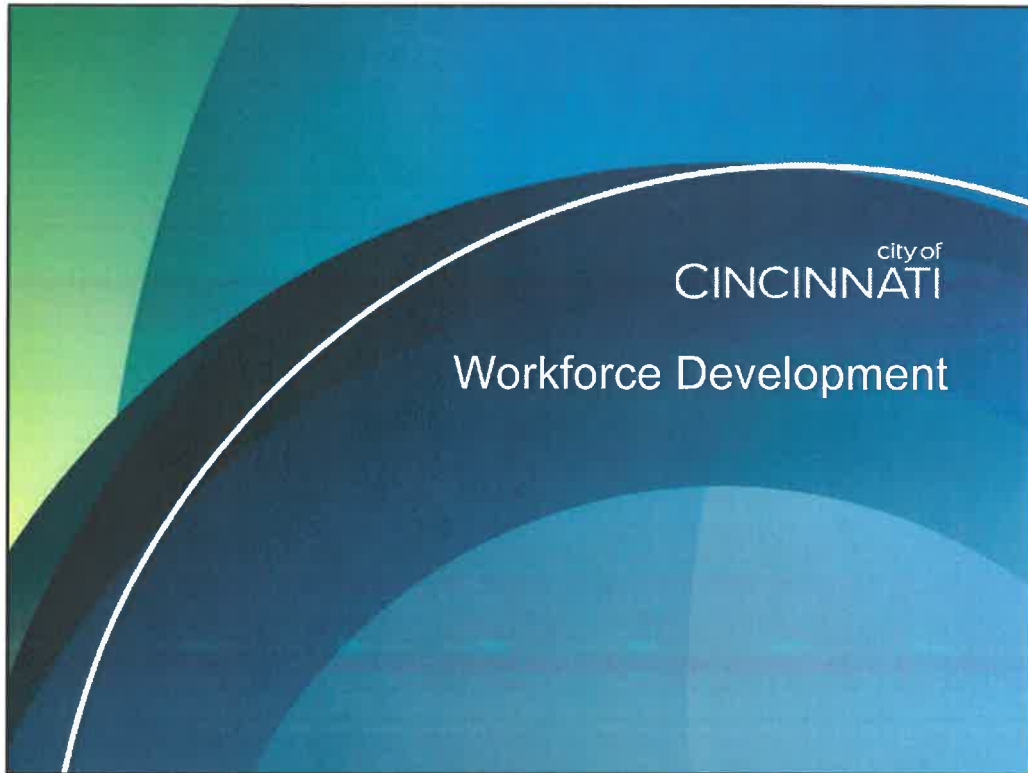
The low-mod population can be a direct benefit (meaning the individual being assisted is at 80% AMI) or it is an area benefit (meaning at least 51% of the population in a specific census tract is at 80% AMI or lower). The map of low-mod census tracts in the City was distributed at the meeting and shown on the following slide.







Neighborhood Revitalization Strategy Area – offers flexibility with public service activities over the 15% public service cap



## Workforce Development

### 2020 – 2024 Consolidated Plan Performance

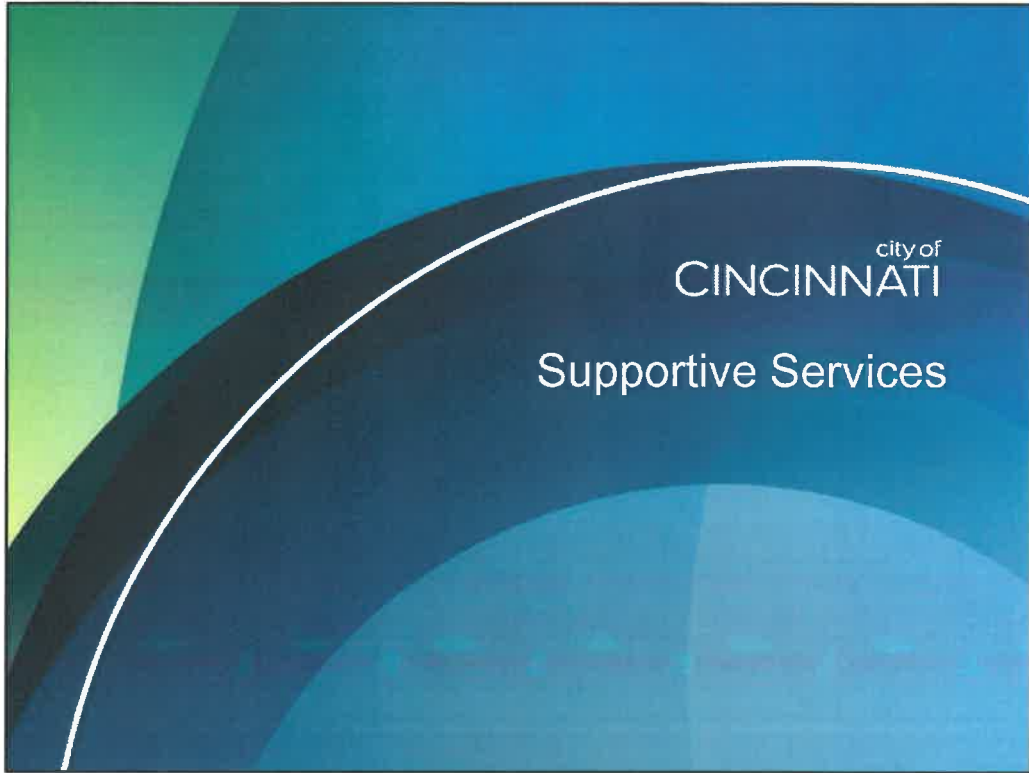
Program	Annual Goal (5-Year)	2020 Results	2021 Results	2021 Allocation
<i>Blueprint For Success</i>	7 (35) Persons	18 persons	16* persons	**\$0
<i>Hand Up initiative</i>	500 (2,500) Persons	235 persons	137* persons	\$1,267,214
<i>Youth and Young Adult</i>	500 (2,500) Persons	366 persons	521 persons	\$723,214

10



\*under reporting the accomplishment for 2021 Hand Up, in progress Blueprint

\*\*prior years resources were available



## Supportive Services

### 2020 – 2024 Consolidated Plan Performance

Program	Annual Goal (5-Year)	2020 Results	2021 Results	2021 Allocation
<i>Emergency Mortgage Assistance</i>	100 (500)	237 persons	244 persons	\$197,214
<i>Fair Housing Services</i>	1,000 (5,000)	1,650 persons	1,057 persons	\$177,214
<i>Tenant Rep.</i>	200 (1,000)	347 persons	737 persons	\$237,214
<i>Project Lift</i>	300 (1,500)	0 households	0 households	\$607,214
<i>Family Re-Housing Assistance</i>	20 (100)	9 households	2 households	**\$0
<i>***Housing Choice Mobility</i>	10 (50)	-	-	\$32,214

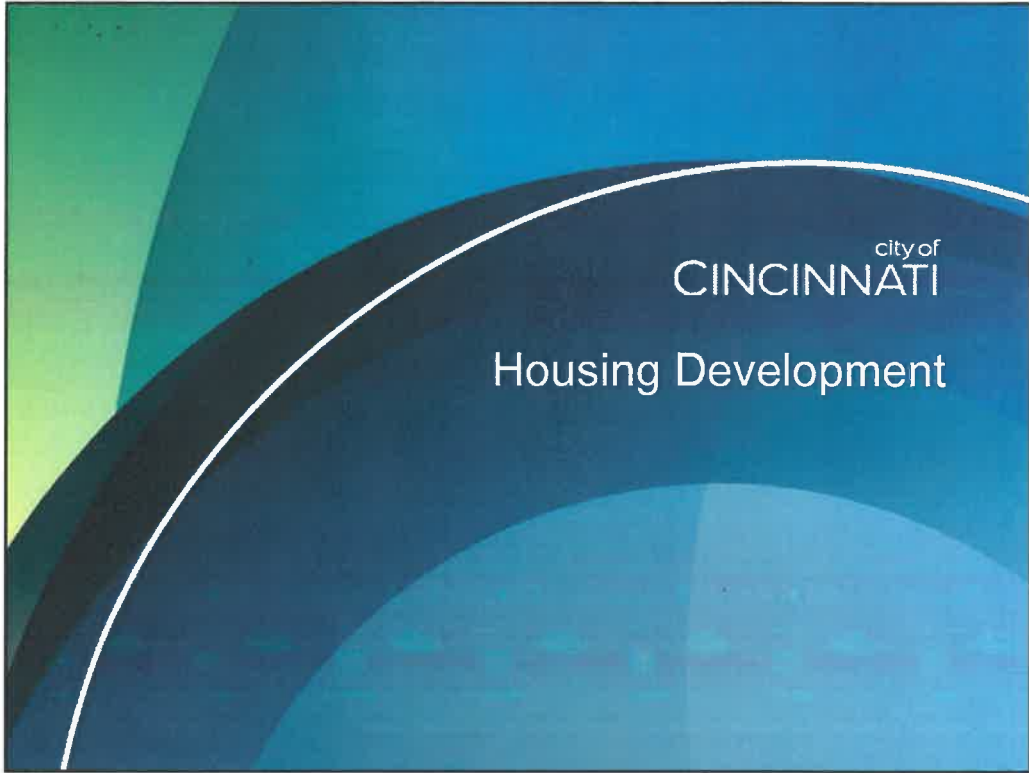
11



\*\*prior years' resources were available

\*\*\* PMCE is hiring dedicated staff for to administer this Code Enforcement Relocation and Housing Choice Mobility Program

Code Enforcement Relocation changed name to Family Re-housing Assistance



## Housing Development

### 2020 – 2024 Consolidated Plan Performance

Program	Annual Goal (5-Year)	2020 Results	2021 Results	2021 Allocation
<i>Compliance Assistance Repairs for the Elderly</i>	10 (50) units	0 units	6 units	**\$0
<i>Housing Repair Services</i>	1,100 (5,500) units	878 units	915 units	\$1,857,214
<i>Historic Stabilization of Structures</i>	1 (5) buildings	1 building	1 building	\$207,214
<i>HARBOR</i>			-	\$257,214
<i>Single Family Homeownership – HOME</i>	3 (15) units	0 units	0 units	\$200,000



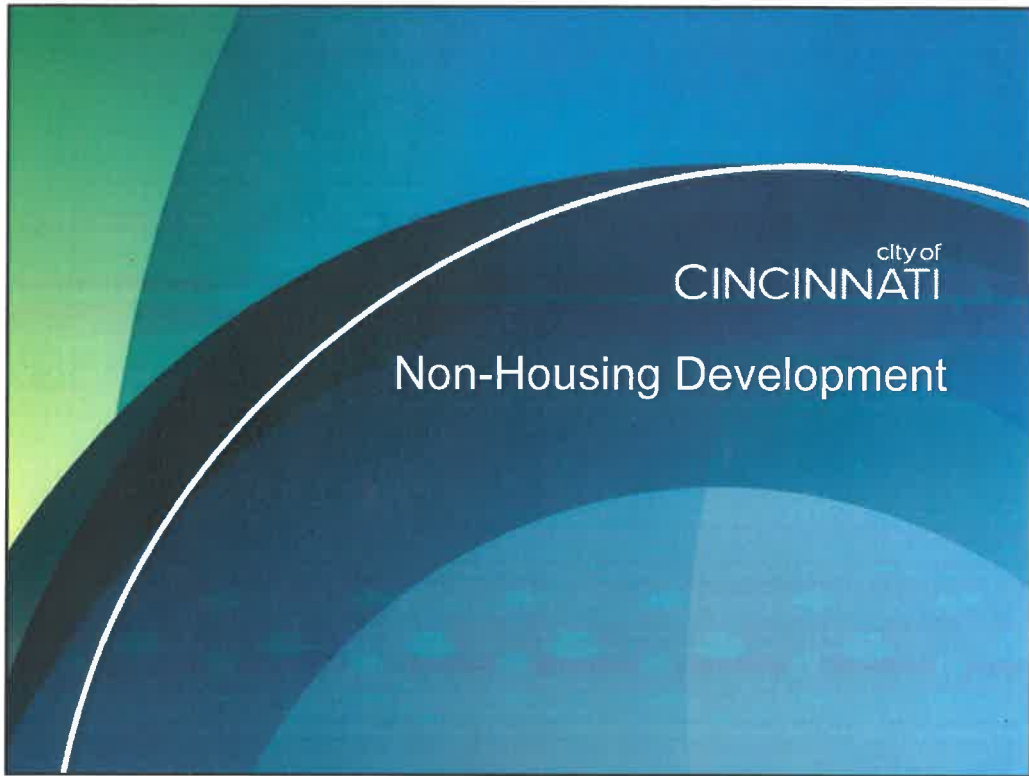
## Housing Development

### 2020 – 2024 Consolidated Plan Performance

Program	Annual Goal (5-Year)	2020 Results	2021 Results	2021 Allocation
<i>SHIP – CDBG</i>	10 (50) units	37 units	314* in progress	\$356,583
<i>SHIP – HOME</i>	20 (100) units	187 units	176 units	\$1,719,844
<i>CHDO Projects – HOME</i>	8 (40) units	57 units	108* in progress	\$410,689
<i>American Dream Down Payment – HOME</i>	20 (100) Units	20 units	11 units	\$150,000
<i>Lead Hazard Testing</i>	120 (600) units	90 units	89 units	\$107,214







## Non-Housing Development

### 2020 – 2024 Consolidated Plan Performance

Program	Annual Goal (5-Year)	2020 Results	2021 Results	2021 Allocation
<i>Commercial and Industrial</i>	2 (10) Acres	in progress	1 building	\$208,759
<i>Concentrated Enforcement</i>	20,000 (100,000) Buildings	16,619 buildings	7,029 buildings	\$582,214
<i>Hazard Abatement Program</i>	250 (1,250) Buildings	229 buildings	172 buildings	\$757,214
<i>Neighborhood Business Improvement</i>	10 (50) Businesses	4 businesses	2 businesses	\$907,214
<i>Small Business Services</i>	40 (200) Businesses	81 businesses	1 business	\$157,214

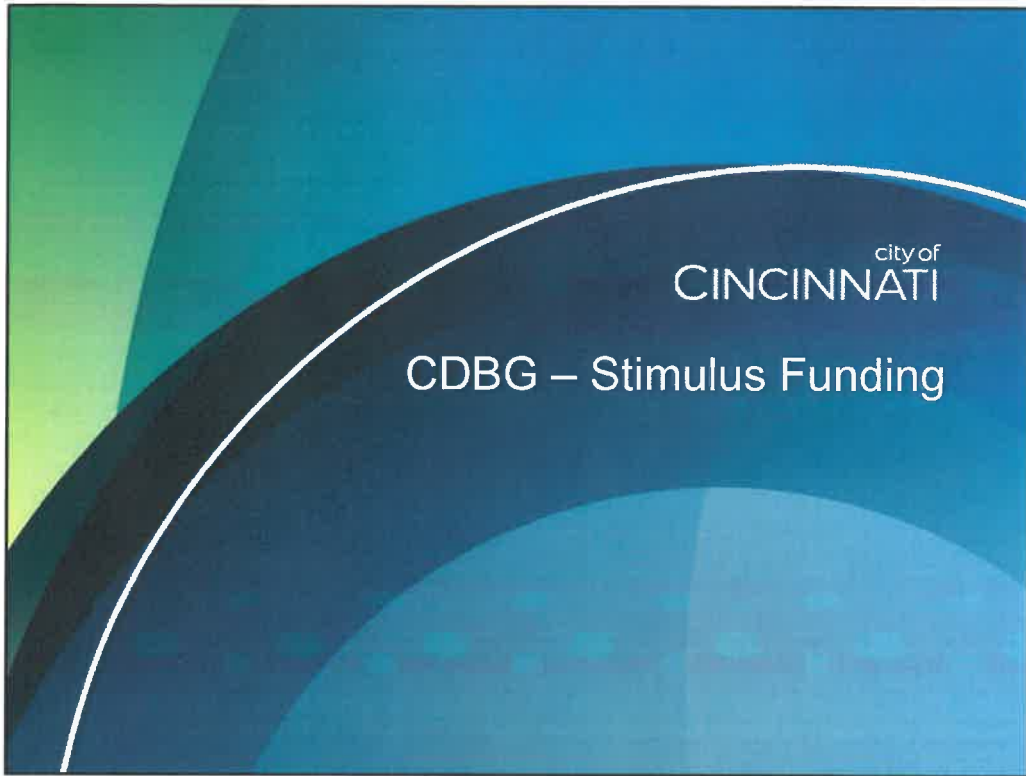


## Non-Housing Development

### 2020 – 2024 Consolidated Plan Performance

Program	Annual Goal (5-Year)	2020 Results	2021 Results	2021 Allocation
<i>Findlay Market Operating</i>	1 (5) Businesses	1 business	1 business	\$97,214
<i>Operating Support for CDCs – CDBG</i>	8 (40) CDCs	9 CDCs	7 CDCs	\$307,214
<i>Operating Support for CHDOs – HOME</i>	2 (10) CHDOs	3 CHDOs	3 CHDOs	\$136,896
<i>Vacant Lot Reutilization</i>	2 (10) Projects	10 projects	4 projects	**\$0
<i>Green Urban Watershed Restoration</i>	1 (5) businesses	1 business	1 business	**\$0





## CDBG – Stimulus Funding (CARES)

Need	Target / Goal	Need	Target / Goal
Homeless Prevention / Subsistence	1,521 / <b>2,324</b> persons	Employment Services	3,299 / <b>3,548</b> Persons
Senior Services	885 / <b>1,747</b> persons	Crime Awareness	2,092 / <b>3,065</b> persons
Legal Services	1,910 / <b>1,850</b> persons	Child Care Services	900 / <b>3,265</b> persons
Substance Abuse Services	205 / <b>1,755</b> persons	Health Services / Food Banks	270 / <b>422</b> persons
Mental Health Services	936 / <b>966</b> persons	<b><i>GRAND TOTAL: 11,963 / 18,942 persons</i></b>	

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### 2021 Entitlement Awards:

CDBG: \$11,774,974

HOME: \$2,737,925

ESG: \$997,610

HOPWA: \$1,281,332

### 2020 Stimulus CARES (Coronavirus Aid, Relief, and Economic Security)

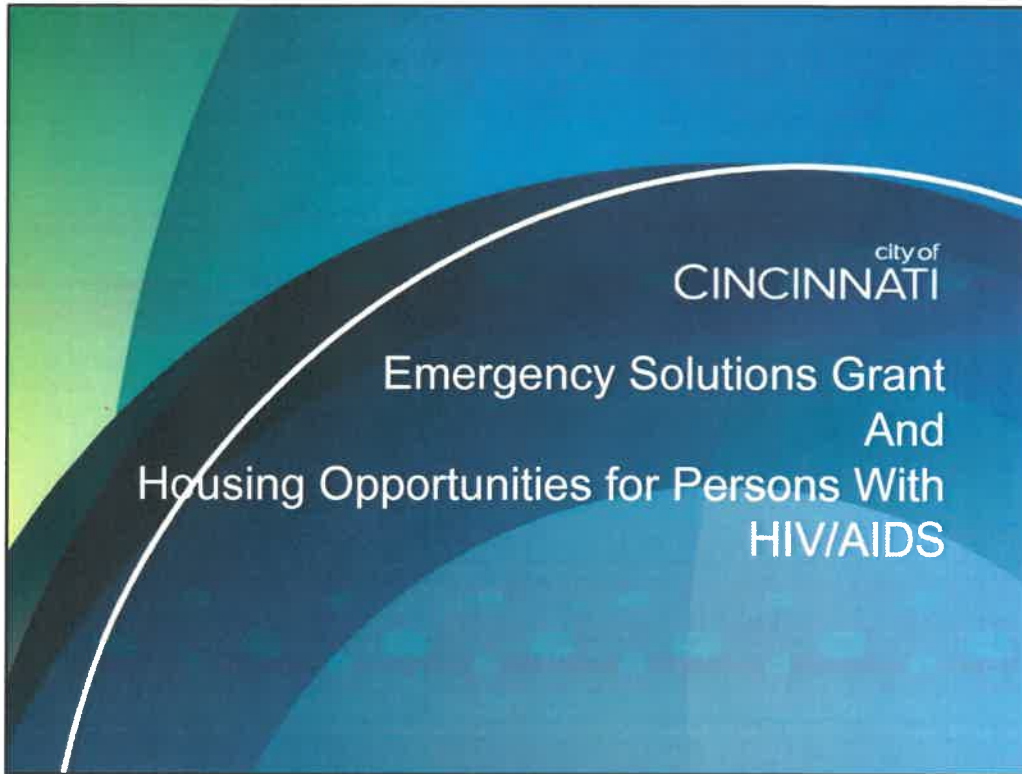
CDBG-CV: \$9,106,648

ESG-CV: \$7,651,777

HOPWA-CV: \$166,072

### 2021 American Rescue Plan

HOME-ARP: \$9,923,076



## ESG and HOPWA

- **Emergency Solutions Grant**
  - ESG – Entitlement
    - Rapid Re-Housing = 119 households (126 clients)
  - ESG – CARES
    - Rapid Re-Housing = 107 households (330 clients)
    - Shelter = 5,358 households (6,501 clients)
    - Homeless Prevention = 217 households (698 clients)
- **Housing Opportunities for Persons With HIV/AIDS (HOPWA)**
  - HOPWA – Entitlement and CARES = 243 households (324 beneficiaries)

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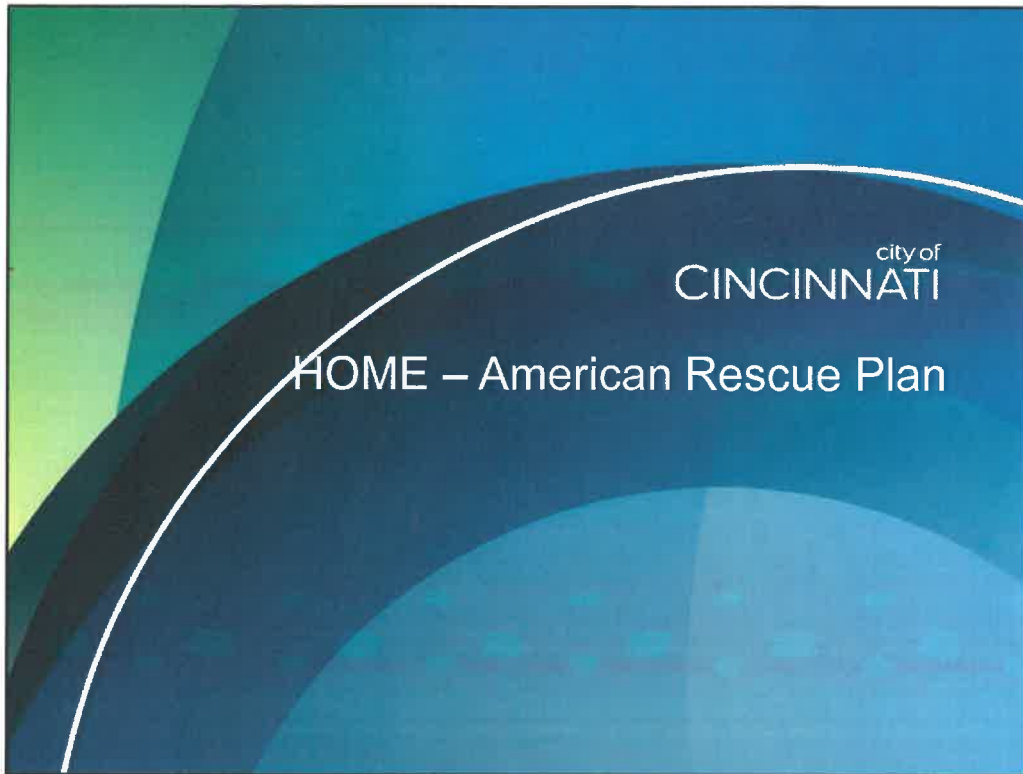
ESG-CV: \$7,651,777

HOPWA-CV: \$166,072

### 2021 American Rescue Plan

HOME-ARP: \$9,923,076

Several waivers were issued on certain federal requirements for the stimulus funding as well as for the entitlement programs. ESG and HOPWA have separate advisory boards for funding recommendations.





## HOME – American Rescue Plan

- **Eligible Activities**
  - Development of affordable housing – minimum 15 years compliance period
  - Tenant-Based Rental Assistance
  - Supportive Services
  - Development of Non-Congregate Shelters
  - Non-profit operating support, Non-profit Capacity Building
- **Qualifying Populations (QP) <50% AMI**
  - Homeless, At-Risk of homelessness, Fleeing domestic violence, assault, stalking, or human trafficking, At risk of housing instability
  - 70% rental units with HOME-ARP must be occupied by QP and remaining 30% of the units may be occupied by households <65% AMI
  - Coordinated entry requirements

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### 2021 Entitlement Awards:

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### 2021 American Rescue Plan

HOME-ARP: \$9,923,076

Several waivers were issued on certain federal requirements for the stimulus funding as well as for the entitlement programs

## HOME – American Rescue Plan

Eligible Activity	Funding Amount
Supportive Services	
Development Non-Congregate Shelters	\$3,000,000
Tenant Based Rental Assistance	
Affordable Rental Housing	\$6,900,000
Non-profit Operating	
Non-profit Capacity Building	
Administration	\$23,076
<b>TOTAL</b>	<b>\$9,923,076</b>

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### 2021 Entitlement Awards:

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### 2021 American Rescue Plan

HOME-ARP: \$9,923,076

Several waivers were issued on certain federal requirements for the stimulus funding as well as for the entitlement programs

HOME-ARP applications received as of February 28, 2022 = 7 applications currently under review

Have estimated \$1,000,000 investment will yield approximately 50 units, target 350 affordable units with HOME-ARP

THANK YOU!!

[Aisha.Tzillah@Cincinnati-Oh.gov](mailto:Aisha.Tzillah@Cincinnati-Oh.gov)

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## 1. Purpose and Use of the Manual

This manual is intended to document policies and procedures for the Emergency Solutions Grant (ESG) program as awarded by HUD to the City of Cincinnati, Ohio. These policies and procedures ensure that the ESG program complies with the applicable federal regulations, is in line with recognized best practices, and is administered consistently throughout the jurisdiction.

This manual was officially adopted and effective January 4, 2022. This manual will remain in effect in its exact state until revisions and/or additions are approved by the City of Cincinnati. This manual will be updated periodically to address changes in HUD's priorities, best practices, local needs, etc. Revisions and/or additions to this manual will be documented in Section 31: *Revisions and Additions*, noting the specific change and the approving official at the City of Cincinnati.

This manual is not intended to replace existing guidance produced by the U.S. Department of Housing and Urban Development (HUD).

## 2. Program Rules

The regulations found in 24 Code of Federal Regulation (CFR) §576 provide the basic standards for implementing eligible activities with ESG funding. Other applicable federal regulations include, but are not limited to:

- 2 CFR §200 are the regulations for uniform administrative requirements, cost principles, and audit requirements for Federal awards to non-Federal entities.
- 24 CFR §5 are general HUD program requirements. Some commonly referenced applicable requirements are:
- 24 CFR §5.609 are the HUD regulations defining the elements of household annual gross income that must be counted in determining income eligibility for the ESG program.
- 24 CFR §5.611 are the HUD regulations defining how adjustments must be made when applicable in determining a rental assistance subsidy.
- 24 CFR §5.617 are the HUD regulations requiring a disallowance of earned income by persons with disabilities residing in TBRA- or TSH-assisted units upon returning to work after certain conditions have been met.
- 24 CFR §5, Subpart L are the HUD regulations for the Violence Against Women Act (VAWA), which provides protections for survivors of domestic violence, dating violence, sexual assault, or stalking.

- 24 CFR 982.401 are housing quality standards established by HUD. Although ESG requirements in 24 CFR 576 are less stringent, Cincinnati's Rapid Rehousing ESG programs adhere to the standards in 24 CFR 982.401 and include minimum standards for fire safety.
- Section 31 of the Federal Fire Prevention and Control Act of 1974 relates to Smoke alarm requirements.

Additional resources and guidance can be found on the ESG Programs page on the HUD Exchange.

### 3. Program Definitions

Area Median Income (AMI) means the midpoint of a region's income distribution – half of families in a region earn more than the median and half earn less than the median. For housing policy, income thresholds set relative to the area median income—such as 30% of the area median income—identify households income-eligible to remain in housing projects.

At risk of homelessness means:

1) An individual or family who:

- a) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- b) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph 1) of the "homeless" definition in this section; and
- c) Meets one of the following conditions:
  - (i) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
  - (ii) Is living in the home of another because of economic hardship;
  - (iii) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- d) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
- e) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons per room, as defined by the U.S. Census Bureau;
- f) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

- g) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
- 2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
- 3) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Administrative costs mean costs of overall program management, planning, coordination, monitoring, reporting and evaluation. Such costs do not include costs directly related to carrying out eligible activities, since those costs are eligible as part of the activity delivery costs of such activities. Administrative costs are limited to up to 7.5 percent of total grant award, to be expended over the life of the grant.

Consolidated Plan means a plan prepared in accordance with 24 CFR part 91. An approved Consolidated Plan means a consolidated plan that has been approved by HUD in accordance with 24 CFR part 91.

Continuum of Care (CoC) means the group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

Continuum of Care Board means the board established by the CoC to act on the behalf of the Continuum in compliance with the Continuum of Care Program regulations.

Emergency shelter means any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. Any project funded as an emergency shelter under a Fiscal Year 2010 Emergency Solutions grant may continue to be funded under ESG.

Family is defined in 24 CFR 5.403 and includes one or more eligible persons living with another person or persons, regardless of actual or perceived sexual orientation, gender identity, or marital status, who are



determined to be important to the eligible person or person's care or well-being, and the surviving member or members of any family described in this definition who were living in a unit assisted under the HOPWA program with the person with AIDS at the time of his or her death.

Gross Rent is the sum of combined rent and utilities costs. For rental assistance services, the gross rent of the proposed unit, including appropriate utility allowances, must be at or below the lower of the rent standard or the reasonable rent.

Household is a single person or family composed of two or more persons residing together. Any group of people that presents together for assistance and identify themselves as a household – regardless of relationship, age, disability, or other factors – are considered to be a household and must be served together as such. The term is used for collecting data on changes in eligibility, changes in access to services, receipt of housing information services, and outcomes on achieving housing stability. Live-In Aides (see “Live-In Aide”) and non-beneficiaries (e.g., a shared housing arrangement with a roommate) who resided in the unit are not included in the household.

Housing Information Services is counseling, information, and referral services dedicated to assisting PLWH and their households locate, acquire, finance, and maintain housing. This may also include fair housing counseling for eligible households that may encounter discrimination based on natural hair types and natural hair styles commonly associated with race, actual or perceived race, color, age, ethnic, national or Appalachian region origin, ancestry, military status, religion, sex, gender identity, transgender status, sexual orientation, disability, marital or familial status, or physical or mental handicap (collectively “protected class”).

Homeless means:

- 1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - a) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
  - b) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
  - c) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
- 2) An individual or family who will imminently lose their primary nighttime residence, provided that:

- a) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
  - b) No subsequent residence has been identified; and
  - c) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;
- 3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
- a) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
  - b) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
  - c) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
  - d) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
- 4) Any individual or family who:
- a) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
  - b) Has no other residence; and

- c) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Homeless Management Information System (HMIS) means the information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness.

Live-In Aide is a person who resides with the ESG Eligible Individual and who meets the following criteria: (1) is essential to the care and well-being of the person; (2) is not obligated for the support of the person; and (3) would not be living in the unit except to provide the necessary supportive services. Live-In Aides are not considered household members. See 24 CFR 5.403 for additional information.

Master Leasing applies to a nonprofit or public agency that leases units of housing (scattered-sites or entire buildings) from a property owner (property owner reference also includes any property owner or agents), and subleases the units to homeless or low-income tenants. By assuming the tenancy burden, the agency facilitates housing of participants who may not be able to maintain a lease on their own due to poor credit, evictions, or lack of sufficient income.

Metropolitan city means a city that was classified as a metropolitan city under [42 U.S.C. 5302\(a\)](#) for the fiscal year immediately preceding the fiscal year for which ESG funds are made available.

Nonprofit organization means a private nonprofit organization that is a secular or religious organization described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency.

Non-substantial rehabilitation means rehabilitation that involves costs that are less than or equal to 75 percent of the value of the building after rehabilitation.

Operating Costs applies to facility-based housing and shelter only, for facilities that are currently open. Operating costs can include day-to-day housing and shelter function and operation costs like utilities, maintenance, equipment, insurance, security, furnishings, supplies and salary for staff costs directly related to the housing project but not staff costs for delivering services

Population means total resident population based on data compiled by the U.S. Census and referable to the same point in time.

Program income shall have the meaning provided in 2 CFR 200.80. Program income includes any amount of a security or utility deposit returned to the recipient or subrecipient.

Program operator means any nonprofit organization or governmental housing agency that receives funds under a contract with the grantee to carry out eligible activities as defined in 24 CFR §576. The selection of program operators is not subject to the procurement requirements of 2 CFR part 200, subpart D. Program operators are required to provide performance data on households served and funds expended. Funding flows to a Program operator as follows:



Program participant means an individual or family who is assisted under ESG program.

Program year means the consolidated program year established by the recipient under [24 CFR part 91](#).

Project-based rental assistance is housing assistance where a recipient or subrecipient identifies a permanent housing unit that meets ESG requirements and becomes available before a program participant is identified to lease the unit, the recipient or subrecipient enters into a rental assistance agreement with the owner to reserve the unit and subsidize its rent in accordance with ESG requirements.

Recipient means any State, territory, metropolitan city, or urban county, or in the case of reallocation, any unit of general-purpose local government that is approved by HUD to assume financial responsibility and enters into a grant agreement with HUD to administer assistance under this part. Cincinnati, a metropolitan city, is an entitlement recipient of ESG funding.

Rehabilitation means the improvement or repair of an existing structure, or an addition to an existing structure that does not increase the floor area by more than 100 percent.

Rental Assistance is a housing assistance service that subsidizes the gross rent of a household, including assistance for shared housing arrangements. The subsidy amount is determined in part based on household income and rental costs associated with the household's lease.

Roommate is a person with whom a relationship (i.e., a shared housing arrangement) is established for the purposes of sharing rent and utility bills in return for receiving a share of the space available. Roommates are not considered household members as they are households unto themselves. The household must identify whether an individual is a household member or a roommate at the time of application and at any subsequent renewals.

Tenant-Based Rental Assistance (TBRA) is a rental subsidy program where the subsidy is not tied to a specific unit, so participants may move to a different unit without losing their assistance, subject to individual program rules.

Trauma Informed Care is defined as an approach in the human service field that assumes that an individual is more likely than not to have a history of trauma. Trauma-Informed Care recognizes the presence of trauma symptoms and acknowledges the role trauma may play in an individual's life- including service staff.

Substantial rehabilitation means rehabilitation that involves costs in excess of 75 percent of the value of the building after rehabilitation.

Unit of general-purpose local government means any city, county, town, township, parish, village, or other general purpose political subdivision of a State.

Urban county means a county that was classified as an urban county under 42 U.S.C. 5302(a) for the fiscal year immediately preceding the fiscal year for which ESG funds are made available.

Veteran is someone who has served on active duty in the Armed Forces of the United States. This does not include inactive military reserves or the National Guard unless the person was called up to active duty.

Victim service provider means a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs.

## 4. Program Purpose and Overview

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act, revising the Emergency Shelter Grants Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. The ESG Interim Rule took effect on January 4, 2012. The change in the program's name, from Emergency Shelter Grants to Emergency Solutions Grants, reflects the change in the program's focus from addressing the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. Further detail on each eligible activity is found in section 14 of this manual.

## 5. ESG Limitations

ESG funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS; as well as administrative activities.

The total amount of the recipient's fiscal year grant that may be used for street outreach and emergency shelter activities cannot exceed 60 percent of the recipient's fiscal year grant.

The total amount of ESG funds that may be used for administrative activities cannot exceed 7.5 percent of the recipient's fiscal year grant. Administrative costs are expenses related to the planning and execution of ESG activities. This does not include staff and overhead costs directly related to carrying out ESG-funded activities, because those costs are eligible as part of those activities. This limit on administrative costs included in all funding agreements, and adherence is ensured through review of monthly billings.

The City of Cincinnati ensures funding approvals adhere to ESG limitations annually during the allocation and subaward process. The City of Cincinnati and STEH monitor invoices to ensure billed activities adhere to funding agreements, which are within ESG limitation of use.

## 6. Roles and Responsibilities

### 6.1 Recipient

The City of Cincinnati is the Grantee as the entitlement jurisdiction for the ESG funding. The City receives annual allocations directly for the Emergency Solutions Grant program as part of the approved 5-year Consolidated Plan and Annual Action Plans. After HUD announces the annual allocation for ESG, the City collaboratively works with STEH to determine how much is allocated for shelters, whether it is \$550,000 or 60% of the annual allocation, with 7.5% of the allocation allocated to administration expenses. After the budget is approved by the City and STEH, the City submits a request to the City's Law Department for an authorizing ordinance and schedule. The authorizing ordinance is then passed by the City of Cincinnati Council. The City works with STEH to author the required Annual Action Plan for the ESG program and submits to HUD through the Integrated Disbursement and Information System (IDIS), HUD's reporting platform and line of credit for the entitlement programs. By 45 days after submission to HUD the Annual Action Plan is deemed approved unless the City is notified in writing otherwise.

All HUD programs are required to have a Tier 1 programmatic environmental review conducted annually. Once the plan is submitted to HUD and the Tier 1 is approved by City's Urban Conservator and Environmental Review Officer, the City's Finance Department sets up the account in the City's accounting system, Cincinnati Financial System (CFS).

The Annual Action Plan is submitted with the required federal forms SF-424 and ESG required certifications indicating the City will comply with the following regulations: requirements of continuous use for buildings which ESG funds are used for the rehabilitation or conversion of buildings for use as emergency shelters for the homeless or when funds are used solely for operation costs or essential services, building requirements standards, nondiscrimination, equal opportunity, Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, requirement of minimizing displacement of persons as a result of a project assisted with these funds, Drug Free Workplace Act of 1988, confidentiality requirements, National Environmental Policy Act of 1969, including to the maximum extent practicable of involving homeless individuals and families in policymaking decisions, funding homeless prevention activities, policy and procedures for the discharge of persons from institutions or systems of care, and participation in a local Homeless Management Information System. Annually on March 31<sup>st</sup>, the City submits the Consolidated Annual Performance and Evaluation Report (CAPER) with the annual ESG accomplishments reported in the Sage HMIS reporting platform.

### 6.2 Subrecipient

Strategies to End Homelessness is private non-profit agency that serves as the Unified Funding Agency (UFA) for Continuum of Care Program funding and oversees the allocation, use, and reporting of ESG funding on behalf of the City of Cincinnati and Hamilton County.

STEH is responsible for conducting needs analysis informed by Point-in-time count, HMIS data including Coordinated Entry, Housing Inventory Chart, and hot-line data assessments. As UFA and HMIS Lead Agency, STEH holds a seat on the CoC Board along with the City of Cincinnati and Hamilton County.

In consultation with the CoC Board, STEH is responsible for providing ESG funding recommendations to the City of Cincinnati, consistent with the Consolidated Plan. STEH assists in completing the five-year Consolidated Plan and the annual updates to that plan in the Annual Action Plans.

STEH enters into a subaward with the City of Cincinnati then issues subawards with selected Program Operators. STEH performs an annual risk assessment of program operators, reviews monthly invoices, monitors for performance and compliance, and assists in completing the annual ESG Consolidated Annual Performance Evaluation Report (CAPER).

STEH is also responsible for providing technical assistance on compliance and best practices.

### 6.3 Program Operators

ESG-funded projects must be operated in accordance with this manual, the funding agreement (including any amendments or addenda), and applicable local, state, and federal requirements.

Program operators must collaborate with the City of Cincinnati and STEH to adapt and enhance local program policies in this manual as needed.

Program operators must enter data for all participants into HMIS in a timely manner, in accordance with HUD requirements, Section 15 of this manual, and local policies and procedures.

Program operators must submit funding requests for eligible expenses at least quarterly. Data and reports must be made available for review as requested by HUD, the City of Cincinnati, and/or Strategies to End Homelessness to enable monitoring of compliance, for a period no less than the required record retention requirements of the program. Timely and accurate reporting must be submitted as requested by HUD, The City of Cincinnati, and/or STEH.

## 7. Environmental Reviews

ESG activities are subject to environmental review by HUD under 24 CFR Part 58. The City of Cincinnati has a Programmatic Agreement with the Ohio State Historic Preservation Office to conduct the reviews for affected projects located with the City. The City of Cincinnati is responsible for supplying all available, relevant information necessary to perform for each property any environmental review required by 24 CFR Part 58. The City of Cincinnati is also required to carry out mitigating measures as required from the review or select an alternate eligible property. HUD may eliminate from consideration any application that would require an Environmental Impact Statement (EIS). The City of Cincinnati and ESG subrecipients, including any contractors of subrecipients, may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct

property for an ESG project, or commit or expend HUD or local funds for eligible ESG activities, until the City has performed an environmental review under 24 CFR Part 58. The City of Cincinnati must have received an approved environmental review of the property prior to any ESG activities beginning.

## 8. Conflicts of Interest

The ESG recipient, subrecipient, and program operators have an obligation to conduct business within guidelines that prohibit real, apparent, or potential conflicts of interest, and adhere to the with the acceptable standards of operating with regards to conflict of interest detailed in 2 CFR 200 and 24 CFR 576.404.

The recipient, subrecipient, and program operators must each establish and implement written policies and procedures to ensure compliance with the conflict of interest requirements outlined in this policy and the regulations, including with regard to procurement. These written standards apply to all employees, board members, contractors, elected or appointed officials, and other agents (collectively “agents”). Each agency must also maintain records to show compliance with organizational conflicts of interest requirements and records supporting exceptions to the personal conflicts of interest prohibitions.

### Individual conflicts of interest

For the procurement of property (goods, supplies, or equipment) and services, the recipient, subrecipient, and program operators must comply with the codes of conduct and conflict-of-interest requirements under the aforementioned federal guidelines for private nonprofit organizations.

No employee, board member, contractor, or agent of the recipient, subrecipient, or program operator shall participate in the selection, award, or administration of a contract supported by Federal funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the agent, any member of the persons immediate family, the persons partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award.

To avoid a conflict of interest, the appearance of a conflict of interest or the need to examine the ethics of acceptance, agents may neither solicit nor accept gratuities, favors, or anything of significant monetary value from contractors, vendors, suppliers, clients, potential clients, potential employees, potential vendors or suppliers, clients, or parties to sub agreements, or any other individual or organization. However, the recipient, subrecipient, or program operators may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value. For example, a program operator may allow employees to accept gifts such as t-shirts, pens, trade show bags, and all other trinkets obtained as members of the public at events such as conferences, training events, seminars, and trade shows that are offered equally to all members of the public attending the event. Any exemptions allow for acceptance of gifts must be detailed in the individual agency’s conflict of interest policy. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards.



## Organizational conflicts of interest

An organizational conflict of interest arises when, because of activities or relationships with other persons or organizations, agents are unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance under this program, or when a covered person's, as defined in this policy, objectivity in performing work with respect to any activity assisted with Federal funding is or might be otherwise impaired.

The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the recipient, the subrecipient, the program operator, or a parent or subsidiary thereof. No program operator may carry out the initial evaluation of program participant eligibility and needs for, or administer homelessness prevention assistance to, individuals or families occupying housing owned by the program operator or any parent or subsidiary of the of the program operator.

No covered person, meaning a person who is an employee, board member, contractor, or agent or elected or appointed official of the recipient, subrecipient, or program operator and who exercises or has exercised any functions or responsibilities with respect to activities assisted with Federal funds, or who is in a position to participate in a decision-making process or gain inside information with regard to ESG-funded activities, may obtain a financial interest or benefit from Federal award programs, have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity, or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has immediate family or business ties, during the person's employment/tenure or during the one-year period following their tenure/employment.

Exceptions to this policy can only be granted by the federal awarding agency (HUD) on a case-by-case basis. Any request for an exception must be submitted by the recipient, even if on behalf of the subrecipient or program operator. No exceptions can be funded federally until receiving final official approval from HUD.

HUD may require the following in order to consider a request for exception to this conflict-of-interest policy:

1. Disclosure of the nature of the conflict, accompanied by a written assurance, that there has been a public disclosure of the conflict and a description of how the public disclosure was made; and
2. An opinion of the recipient's attorney that the interest for which the exception is sought would not violate State or local law.

Exceptions will only be granted if HUD concludes that the exception will serve to further the purposes of ESG program and the effective and efficient administration of the specific ESG project, taking into account the cumulative effect of the following factors, as applicable:

1. Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;
2. Whether an opportunity was provided for open competitive bidding or negotiation;
3. Whether the affected person has withdrawn from his or her functions, responsibilities, or the decision-making process with respect to the specific activity in question;
4. Whether the interest or benefit was present before the affected person was in the position that enabled him/her to exercise any functions or responsibilities with respect to activities assisted with Federal funds or to participate in a decision-making process or gain inside information with regard to ESG-funded activities;
5. Whether undue hardship will result to recipient, the subrecipient, or the person affected, when weighed against the public interest served by avoiding the prohibited conflict;
6. Any other relevant considerations.

## 9. Affirmative Marketing

Cincinnati/Hamilton County's Coordinated Entry process helps prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner. All literally homeless people in the CoC's geographic area have fair and equal access to the coordinated entry process, regardless of where or how they present for services. Designated shelter case managers at all shelters and all outreach workers are trained and approved to complete the standardized assessment with every client that is eligible for their services. Those at risk of homelessness are diverted from shelter as resources are available from the front door of the shelters, which is the Central Access Point call line (381-SAFE).

Marketing strategies include direct outreach to people on the street and other service sites, informational flyers left at service sites and public locations, announcements during CoC and other homelessness advocacy meetings and educating mainstream service providers. Information about the Central Access Point is displayed on monitors at public libraries, where people experiencing homelessness often spend time. All physical entry points are accessible to people with disabilities, or are able to make appropriate accommodations, and easily accessible by public transportation.

All people experiencing homelessness in Hamilton County have equal access to Coordinated Entry, regardless of their first spoken language. The Coordinated Entry system ensures all non-English speakers will have the opportunity to complete the VI-SPDAT in their preferred language according to the following procedure:

- When a client is identified by a shelter or outreach team that needs to complete a VI-SPDAT but does

not speak English fluently, agencies are expected to utilize a professional language interpretation service to complete the VI-SPDAT in the client's preferred language. If these services are not available within the agency, staff may notify the Coordinated Entry Manager at Strategies to End Homelessness for approval of the use of the STEH Language Line account.

- Upon approval, Coordinated Entry staff will facilitate a connection to the Central Access Point's (CAP) Language Line account over the phone with the shelter/outreach staff.
- Shelter/outreach staff will call the CAP Line at the agreed upon time with the client on speakerphone. The shelter or outreach staff must be an approved VI-SPDAT assessor.
- CAP staff will then call the Language Line and set up an interpreter for the designated language.
- Shelter/outreach staff will then proceed with the VI-SPDAT assessment over the phone, using the Language Line interpreter.
- Shelter/outreach staff should record this encounter in the Case Notes section in the client's VI-SPDAT HMIS record.

## 10. Housing First

All of the jurisdiction's ESG program operators follow a Housing First approach. Housing First is a proven approach, applicable across all elements of systems for providing housing assistance to vulnerable populations, in which people experiencing a housing crisis or homelessness are connected to permanent housing/assistance swiftly and with few or no treatment preconditions, behavioral contingencies, or other barriers. It is based on overwhelming evidence that people can achieve stability in permanent housing if provided with the appropriate level of services. Numerous studies have shown that Housing First yields higher housing retention rates, drives significant reductions in the use of costly crisis services and institutions, and helps people achieve better health and social outcomes.

The core components of Housing first are:

1. Few to no programmatic prerequisites to permanent housing entry. ESG eligible persons are provided access to ESG programs with no programmatic preconditions such as demonstration of sobriety, completion of alcohol or drug treatment, agreement to comply with a treatment regimen, participation in services, or other unnecessary conditions. Participants are also not required to first enter a transitional housing program in order to enter permanent housing.
2. Low barrier admission policies. ESG programs aim to serve persons with the highest service needs, and do not screen out participants based on minimum income requirements, credit or financial history, criminal record, or other housing barriers. Persons with disabilities are offered clear opportunities to request reasonable accommodations within the application and screening process and during program participation. ESG programs providing housing assistance ensure that participants with disabilities are housed in buildings and units with special features that accommodate their disabilities.

3. Rapid and streamlined entry into housing. ESG programs utilize Coordinated Entry for all RRH openings for streamlined access to housing, and act quickly to provide financial assistance, move participants into housing, and provide stabilizing supportive services.
4. Persistent engagement with voluntary supportive services. ESG programs proactively offer supportive services throughout the participant's stay in the project. Participants and program operator staff work together to create the participant's ESG case plan, which includes participant-identified goals to achieve housing stability. Program operator staff use motivational interviewing to encourage participants to contemplate positive behavior change, but do not mandate any specific goals that the participant does not choose. Services are informed by a harm-reduction philosophy that recognizes that drug and alcohol use and addiction are part of some participants' lives. Participants are engaged in non-judgmental communication regarding drug and alcohol use and are offered education regarding how to avoid risky behaviors and engage in safer practices. The focus of services is on housing stability and access to care, rather than on therapeutic or treatment goals, although services or appropriate referrals are provided if the participant identifies such goals. Program operator staff meet with participants regularly to review case plans and repeatedly offer services, but participants are not terminated from the program for refusal to take part in services, or for noncompliance with a service plan. It is the responsibility of program operators to make services desirable and effective, rather than using the threat of losing housing to coerce participation.
5. Tenants have full rights, responsibilities, and legal protections. Program operators educate participants about their lease terms, provide access to legal assistance, and encourage them to exercise their full legal rights and responsibilities.
6. Practices and policies to prevent lease violations and evictions. Program operators make every effort to prevent eviction to homelessness. Mediation is provided between property owners and participants to attempt to solve issues that arise to avoid eviction. If participants are evicted by a private property owner, program operators secure them new housing rather than terminating them from the ESG projects. Programs offer counseling on good tenancy and money management to teach participants important skills to prevent eviction and contribute to lasting housing stability.
7. Applicable in a variety of housing models. Housing First is implemented in all of the jurisdiction's ESG projects.

## 11. Fair Housing

ESG-funded services are available on an equal basis to any eligible individual or household without discrimination based on natural hair types and natural hair styles commonly associated with race, actual or perceived race, color, age, ethnic, national or Appalachian region origin, ancestry, military status, religion, sex, gender identity, transgender status, sexual orientation, disability, marital or familial status, or physical or mental handicap (collectively "protected class").

Recipients, subrecipients, and program operators adhere to the nondiscrimination and equal opportunity requirements of State and Federal laws and Executive Orders, including, but not limited to:

1. The Fair Housing Act (42 U.S.C. 3601-19)
2. Executive Order 11063, as amended by Executive Order 12259 (3 CFR, 1959-1963 Comp., p. 652 and 3 CFR, 1980 Comp., p. 307) (Equal Opportunity in Housing Programs)
3. Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4) (Nondiscrimination in Federally Assisted Programs)
4. The Age Discrimination Act of 1975 (42 U.S.C. 6101-6107);
5. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794)
6. Title II of the Americans with Disabilities Act, 42 U.S.C. 12101 et seq.;
7. 24 CFR part 8;
8. 42 US Code 3607
9. Ohio Revised Code 4112 et seq.
10. Ohio Administrative Code 4112-5
11. City of Cincinnati Equal Employment Opportunity Chapter 325 Cincinnati Municipal Code
12. City of Cincinnati Ordinance 16-2015
13. Cincinnati City Ordinance 65-2006
14. Cincinnati City Ordinance 235-2013
15. Cincinnati City Ordinance 379-2019

Agencies will not discriminate in the sale, rental, or financing of housing based on a person's status as a member of a protected class. A person's status as a member of a protected class will not be a factor in the determination of eligibility for ESG services or the type, duration, or amount of assistance provided. Agencies will make reasonable accommodations in rules, policies, practices, or services when such accommodations may be necessary for a person with a disability to have the equal opportunity to use and enjoy their housing unit. ESG funding will not be paid to property owners who refuse to make such accommodations to their rules, policies, or practices, or who do not allow tenants with disabilities to make reasonable access-related modifications to their private living space, as well as to common use spaces.

ESG funded agencies must comply with the Affirmatively Furthering Fair Housing (AFFH) requirement to take meaningful actions that overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

Agencies must take affirmative steps to ensure that all persons who qualify for ESG assistance, regardless of protected status, know of the availability of the ESG program, including facilities and services accessible to persons with a handicap.

## 12. Confidentiality

The City of Cincinnati, Strategies to End Homelessness, and program operators must ensure that confidentiality procedures are followed to protect the identity of individuals who inquire about and/or receive ESG services. In addition to names of individuals, other personally identifiable information (PII) that must be kept confidential includes any data that, alone or in conjunction with other data, is likely to disclose a participant's identity and/or location. In some circumstances, identification of personal participant characteristics such as race/ethnicity, gender, age, or address can lead to the disclosure of an individual's identity. It is important, therefore, to not limit protection to an individual's name, but rather to protect any and all information that could lead to the disclosure of an individual's identity. The privacy of confidential information must be considered during all phases of grant administration and service delivery including collecting, storing, and sharing participant data, as well as during project monitoring.

### Gathering Participant Data and Explaining Right to Confidentiality

ESG program operators need to collect an array of data on each household served with ESG funds. Data collection is an integral part of ensuring that programs serve eligible households with appropriate eligible services in accordance with the regulations. The data is also important for performance reports, research, and evaluations. Participant data should be collected at intake and subsequent meetings in a private space where the participant and staff person can talk without risk of other staff or participants overhearing. PII should only be accessible to staff whose responsibilities require such information.

At the time of application for ESG assistance, program operator staff must explain the participant's right to confidentiality, as well as the need for prior written authorization to disclose participant information. The participant should be informed that all information contained in the participant's file is confidential; that staff members with access to information about the participant are bound by confidentiality guidelines and shall not disclose this information without prior written consent.

### Written Consent to Release Information

The City of Cincinnati, Strategies to End Homelessness, and program operators must protect and may not disclose the participant's confidential information unless the participant expressly consents to such disclosure in writing using a consent to release information form. A general or blanket consent form is not appropriate. The form should identify: what specific information the participant agrees (and does not agree) to share, why and with whom the information will be shared, how the participant may revoke or cancel their consent, and the time period during which consent is granted. This time period may depend on its particular purpose or may be defined by the participant. The intent of sharing information should be thoroughly explained to all participants as well as clearly stated on the form. The consent form must be fully executed with the participant signature (or legal guardian, if applicable) and date. Typically, the effective time of consent forms should be no longer than thirteen months, after which time a new consent should be obtained. A participant may revoke or withdraw their consent at any time after signing.

### Storing Participant Records

Any information that includes PII, shall not be visible or accessible to staff persons without a need to know, or to any other persons.

The City of Cincinnati, STEH, and program operators will take appropriate steps to ensure the security of confidential information, including (but not limited to):

- Maintain physical records in a secure location with access limited to staff members who require access for their job.
- Never leave participant files, or materials intended for a participant's case record, on a desktop, in an office, or in other unsecure areas.
- Maintain electronic records in a secure server location with access granted on a need-to-know basis.
- Store portable equipment and storage devices such as CD, DVD, Zip disks, tapes, floppy drives, USB drives or other removable storage media in an appropriately access-limited location.
- Install and maintain antivirus software on all computer workstations and laptops accessing confidential information.
- Enable screen savers with authentication (locking passwords) for all computer systems.
- Log out, shut down, or lock the system when leaving computers unattended at any time.
- Use caution when accessing email, and do not trust any unexpected emails. Never open an attachment without first verifying its type and checking it with an antivirus program. If in doubt, delete it, and/or contact the sender first.
- Refrain from sharing confidential information, including participant names, through unencrypted email.

- Position monitors and printers so that others cannot see or obtain confidential or sensitive data.
- Change physical safeguards (keys, cipher locks, passwords, etc.) which are used to secure confidential information occasionally, and every time someone who formerly had authorized access either leaves program operator employment, no longer has job requirements which require access, or a key securing such access is lost, stolen or unaccounted for.
- Securely dispose of unnecessary confidential information, whether physical or electronic, in an approved manner (in compliance with record retention requirements).

### Avoiding Unintentional Information Sharing

Staff must exercise good judgement and care at all times to avoid unauthorized or improper disclosure of confidential information. Conversations in public places, such as restaurants, elevators, and public transportation, should be limited to matters that do not pertain to information of a sensitive or confidential nature. This applies to conversations of any kind, including, but not limited to, emails, social networking websites, or any other contact with others who may not be authorized to receive confidential information. Staff must be careful not to discuss confidential information without identifiers in a way that an unauthorized recipient could nonetheless determine the subject involved, and should be sensitive to the risk of inadvertent disclosure and should for example, refrain from leaving confidential information on desks or otherwise in plain view and refrain from the use of speaker phones to discuss confidential information if the conversation could be heard by unauthorized persons.

### Addressing a Breach in Confidentiality

For the purpose of this policy, the term “data breach” refers to an organization’s unauthorized or unintentional exposure, disclosure, or loss of sensitive personal information. The best way to prevent data breaches is to safeguard participant data using the practices and guidance outlined in this document. However, even with effective policies and procedures in place to protect participant confidentiality, data breaches may occur.

If a program operator discovers that a breach has occurred, they should designate a lead staff person to investigate the breach and to ensure a coordinated response. Key questions to investigate a data breach are:

- How did the data breach occur?
- What data has been breached?
- What computer or record keeping systems have been compromised by the breach?
- Is the data breach ongoing?
- Where is the compromised data now?
- Who is affected by the data breach?



Various types of data breaches can take place and each will require a different response once fully investigated. For example, the improper disposal of paper documents will require different action steps than the unauthorized access of an agency's computer system. Additionally, once investigated, it may be determined that lost or stolen data was sufficiently encrypted to protect participant confidentiality.

Once a data breach is discovered, the program operator must take steps to mitigate any ongoing or future damage. The necessary steps to secure breached data will depend on what and how the data was breached, but may include:

- Attempt to retrieve and secure stolen or lost data
- Communicate the implications to any external recipients of breached data
- Disconnect from the Internet
- Shut down computer systems
- Reset passwords
- Limit staff or vendor access to data and records (especially if involved in the incident)
- Hire computer or security experts for assistance
- Identify legal or funding source requirements pertaining to data breaches

After identifying whose information was compromised in a data breach and what data elements were included (e.g., name, age, date of birth, Social Security number), the program operator must notify the affected individuals. When appropriate, funders and partners should also be notified. The notification should:

- Provide the date that the breach occurred, and when it was discovered
- Describe what happened and what information was involved
- Outline steps affected individuals should take to protect themselves
- Describe actions taken to investigate and remedy the breach
- Provide contact information for individuals to gain additional details or report harmful impacts of the breach (e.g., agency contact person, phone number, e-mail address, etc.)

If an affected individual is a minor, the parent or guardian should be notified. If the data breach included many affected individuals, the program operator may want to consider posting a general notice at office and program locations, on the agency website, or in print/broadcast media. Other parties that may also need to be notified include legal counsel, law enforcement, partner agencies, funders, insurance companies, or the media. After

the data breach has concluded and all affected parties have been notified, review the incident, and take measures to avoid a similar future occurrence.

To prevent re-occurrence, the program operator should document the incident and response, re-train staff on confidentiality practices, review policies and procedures and revise them if necessary, and install new computer security systems if existing systems are found to be inadequate.

All staff must sign confidentiality agreements prior to being granted access to confidential information.

#### Agency Written Confidentiality Policies & Procedures

The City of Cincinnati, STEH, and program operators must have written confidentiality policies and standard operating procedures in place that describe how they protect participant confidentiality in accordance with this policy. Strategies to End Homelessness will conduct periodic review of these procedures.

### 13. Violence Against Women Act Requirements

The Violence Against Women Act (VAWA) provides protections and remedies for program applicants and participants who are survivors of domestic violence, dating violence, sexual assault, or stalking (collectively “domestic violence”). Despite the name of this law, VAWA protections and remedies are available regardless of sex, gender identity, or sexual orientation. Per 24 CFR §5, Subpart L, VAWA applies to all HUD programs, including ESG.

Although much of the VAWA protections apply to persons in housing programs, VAWA also prohibits emergency shelters from denying admission to or removing from the emergency shelter any individual or family on the basis or as a direct result of the fact that the individual or family is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the individual or family otherwise qualifies for admission or occupancy.

A person or beneficiary of the ESG Program may not be denied admission to, denied assistance under, terminated from participation in, or evicted from their housing unit on the basis or as a direct result of the fact that the applicant or beneficiary is or has been a survivor of domestic violence, if the applicant or beneficiary otherwise qualifies for admission, assistance, participation, or occupancy.

Agencies operating ESG Rapid Rehousing projects must comply with the following VAWA provisions:

1. The Notification of Occupancy Rights under VAWA, and certification form must be provided at the time the applicant is provided or denied assistance or admission to the ESG RRH program, and with any notification of eviction or notification of termination of assistance.
2. An applicant for assistance or tenant may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the housing on the basis or as a direct result of the fact

that the applicant or tenant is or has been a victim of domestic violence if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy. The tenant may also not be denied tenancy or occupancy rights solely on the basis of criminal activity directly relating to domestic violence, if certain circumstances apply.

3. An incident of actual or threatened domestic violence shall not be construed as:
  - a. A serious or repeated violation of a lease executed under a ESG housing program by the victim or threatened victim of such incident; or
  - b. Good cause for terminating the assistance, tenancy, or occupancy rights under a ESG housing program of the victim or threatened victim of such incident.
4. Survivors of domestic violence may request an emergency transfer to a housing unit that the survivor believes is safe, or bifurcation of the lease so that the abuser may be evicted.
5. All leases must incorporate VAWA protections, or be accompanied by a VAWA lease addendum, and housing owners/managers must be made aware of the option to bifurcate a lease in accordance with §576.409(e) and 24 CFR 5.2009.
6. A contract or rental agreement must be in place between the program operator and the property owner that includes:
  - a. The requirement to comply with VAWA requirements (24 CFR part 5, subpart L);
  - b. The requirement for the property owner to provide the Notice of Occupancy Rights and Certification Form described above with any notice of eviction;
  - c. The property owner's obligation to comply with the confidentiality requirements under 24 CFR 5.2007(c); and
  - d. The obligation for the lease between the property owner and the participant to include all VAWA protections.

Nothing in the VAWA regulations limits the authority of a program operator, when notified of a court order, to comply with a court order with respect to:

1. The rights of access or control of property, including civil protection orders issued to protect a victim of domestic violence, dating violence, sexual assault, or stalking; or
2. The distribution or possession of property among members of a household.

VAWA does not limit any available authority of a property owner or program operator to evict or terminate assistance to a tenant for any violation not premised on an act of domestic violence that is in question against

the tenant or an affiliated individual of the tenant. However, the tenant, who is or has been a victim of domestic violence, or is affiliated with an individual who is or has been a victim of domestic violence, may not be subjected to a more demanding standard than other tenants in determining whether to evict or terminate assistance.

VAWA does not limit the authority of a property owner or program operator to terminate assistance to or evict a tenant under a ESG housing program if the housing provider can demonstrate that an actual and imminent threat to other tenants or those employed at or providing service to property would be present if that tenant or lawful occupant is not evicted or terminated from assistance. In this situation, eviction or termination of assistance should only occur when there are no other actions that could be taken to reduce or eliminate the threat, including, but not limited to, transferring the victim to a different unit, barring the perpetrator from the property, contacting law enforcement to increase police presence or develop other plans to keep the property safe, or seeking other legal remedies to prevent the perpetrator from acting on a threat. Restrictions predicated on public safety cannot be based on stereotypes, but must be tailored to particularized concerns about individual residents.

All information submitted in requesting an emergency transfer or documenting an incidence of domestic violence, including the fact that an individual is a survivor and their housing location (confidential information), shall be maintained in strict confidence by the covered housing provider. Confidential information may not be entered into any shared database or disclosed to any other entity or individual, except to the extent that the disclosure is:

1. Requested or consented to in writing by the individual in a time-limited release;
2. Required for use in an eviction proceeding or hearing regarding termination of assistance from the ESG program; or
3. Otherwise required by applicable law.

Detail on how VAWA protections must be implemented, limitations on requiring documentation of instances of domestic violence, and a list of local organizations providing assistance to survivors of domestic violence are found in the Emergency Transfer Plan (Appendix A of this manual) that has been developed and adopted by all City of Cincinnati ESG subrecipients.

## 14. Standards for Providing ESG Assistance

### 14.1 Rapid Rehousing (RRH)

#### Eligibility for ESG RRH

Eligible applicants for RRH must meet one of the following categorical definitions of homeless:

- 1) Category 1: Literally homeless

- a) A household that lacks a fixed, regular, and adequate nighttime residence, meaning:
  - i) Living in a primary nighttime residence that is a public or private place not designed for or ordinarily used for as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground); or
  - ii) Living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals);
  - iii) Exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering the institution.

## 2) Category 4: Fleeing, or attempting to flee, domestic violence

- a) A household who:
  - i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; and
  - ii) Has no other residence; and
  - iii) Lacks the resources or support networks to obtain other permanent housing.

## Income Eligibility

Rapid re-housing does not have income eligibility requirements at the time of intake; however, to qualify for continuation of rapid re-housing assistance, an applicant must have an annual income at or below 30% AMI at the time of re-evaluation. There are no other initial income eligibility requirements to receive program services. Income information is collected at intake to satisfy HUD's data quality standards.

## Verification of Homeless Status

Housing providers must adhere to the following order of priority for documentation of homeless status. One of the lesser forms may only be used if the optimal form of documentation is unobtainable. Housing provider staff must document their due diligence to attempt to acquire the optimal type(s).

### 1) Third-party documentation

- a) Documentation of the direct observation/knowledge of the participant's homelessness status from a person or entity that is not the housing provider or the participant,

- i) Records contained in Cincinnati/Hamilton County CoC's HMIS, Clarity by Bitfocus, or a comparable database used by a victim service provider, are ideal and are the expectation in most circumstances.
- ii) If the participant is exiting an institution, discharge paperwork or a written or oral referral from an appropriate official of the institution, stating the beginning and end dates of the stay in the institution is considered acceptable third-party documentation. All oral statements must be recorded by the housing provider. The participant's homeless status at entry into the institution must also be documented.

## 2) Intake worker observations

- a) Detailed written account and certification of the housing provider intake worker's physical observation of the location where the individual or head of household is currently residing. The written observation must include the intake worker's own encounter of the individual or head of household in that location.

## 3) Certification from the person seeking assistance

- a) Written certification from the participant stating dates and locations of current homelessness status.

Evidence of homeless status must be current. HUD expects the CoC to develop reasonable intake procedures that allow them to serve the households who are prioritized for the type of assistance they provide. This includes defining how long homeless documentation can be considered current. In general, HUD considers it reasonable to establish a policy that a participant's homeless status is considered current for up to seven days. Cincinnati/Hamilton County CoC has 100% HMIS participation of all emergency shelters and street outreach projects in the geographic area. Therefore, all (local) stays in shelter and all outreach encounters are documented in HMIS. In order to ensure that the most vulnerable eligible individual and families are housed, while also prioritizing third party documentation and allowing realistic expectations of street outreach workers and their workload, the CoC obtained HUD approval to establish the following parameters:

- Documentation of a shelter stay must be dated within 7 days prior to housing project enrollment, and within 14 days prior to housing move-in. *For example, if shelter stay is documented in HMIS on March 3<sup>rd</sup>, the participant is eligible for enrollment on or before March 10<sup>th</sup>. The participant is eligible for move-in on or before March 17<sup>th</sup>.*
- Documentation of a street outreach encounter must be dated within 30 days prior to housing project enrollment and housing move-in. *For example, if there is a street outreach encounter in HMIS on March 15<sup>th</sup>, the participant is eligible for enrollment and move-in on or before April 14<sup>th</sup>.*

NOTE: If the participant qualifies under Category 4 of the homeless definition in 24 CFR 576.2 because the individual or family is fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, then acceptable evidence includes an oral statement by the individual or head of household seeking assistance that they are fleeing that situation, that no subsequent residence has been identified and that they lack the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other housing. If the housing provider is a victim service

provider, the oral statement must be documented by either a certification by the individual or head of household; or a certification by the intake worker. If the housing provider is not a victim service provider, the housing provider should contact Coordinated Entry staff for guidance.

## PROCEDURE

- Coordinated Entry only refers Category 1 participants who are active in an emergency shelter or have a documented street outreach encounter in HMIS within the past 30 days. The housing provider should schedule an intake appointment as soon as possible after receiving the referral. Immediately prior to scheduling the intake appointment, housing provider staff should run a [CIN-01] Verification of Homelessness Report in Clarity by Bitfocus and verify that the report documents a shelter stay within 7 days or a street outreach encounter within 30 days. It is best practice to place a copy of the report run on this date in the participant's physical or electronic record. If the report does not document a shelter stay or outreach encounter within the required timeframe, the housing provider should confirm homeless status with the participant. If the participant reports that they are no longer homeless, the housing provider should contact Coordinated Entry, and not schedule an intake. If the housing provider believes the participant still meets eligibility criteria, they must begin the process for obtaining third party documentation, which is required to be current at enrollment.
- At enrollment, the housing provider must run the [CIN-01] Verification of Homelessness Report again and verify that it documents a shelter stay within 7 days or a street outreach encounter within 30 days prior to the enrollment date. A copy of the report must be placed in the participant record. If participant records are electronic, a PDF of this report should be attached. If the report does not document a shelter stay or outreach encounter within the required timeframe, the housing provider should confirm homeless status with participant. If housing provider believes that the participant still meets eligibility criteria, they must:
  - Attempt to obtain other third-party documentation, for example written documentation from a homeless shelter outside of Hamilton County, or, if the participant is living unsheltered, the housing provider should contact the appropriate street outreach team to request assistance in documenting the participant's homeless status. Only in the rarest circumstances, should third party documentation be unobtainable for eligible participants. Housing providers are encouraged to contact Coordinated Entry before enrolling a participant without current third party documentation of homelessness.
  - In the unlikely circumstance that third party documentation cannot be obtained after taking these steps, the housing provide must document that the street outreach program and/or shelter has been contacted and include reasonable justification why they are unable to provide third party verification of homelessness in HMIS or otherwise. The housing provider must then physically observe the participant in the location where the individual or head of household is residing and provide a detailed and certified written account.
  - In the extremely unlikely circumstance that the housing provider is unable to observe the participant in the location where they are residing, the housing provider must also provide reasonable justification why, and then must obtain a credible written certification from the participant detailing dates and location(s) of their homeless episode(s).

- The housing provider should assist the participant in identifying and securing a housing unit as quickly as possible after enrollment. At move-in, the housing provider must verify that the most recent [CIN-01] Verification of Homelessness Report in the participant record documents a shelter stay within 14 days or a street outreach encounter within 30 days of the housing move-in date. If the report does not document a shelter stay or outreach encounter within the required timeframe, a new report should be run, and if the new report documents the household's homelessness within the required timeframe, this report must be added to the participant record. If the new report does not document a shelter stay or outreach encounter within the required timeframe, the housing provider must confirm homeless status with participant. If housing provider believes participant still meets eligibility criteria, they must:
  - Attempt to obtain other third-party documentation, for example written documentation from a homeless shelter outside of Hamilton County, or, if the participant is living unsheltered, housing provider should contact the appropriate street outreach team to request assistance in documenting the participant's homeless status. Housing providers are encouraged to contact Coordinated Entry before housing a participant without current third-party documentation of homelessness.
  - In the unlikely circumstance that third party documentation cannot be obtained after taking these steps, document that the street outreach program and/or shelter has been contacted and include reasonable justification why they are unable to provide third party verification of homelessness in HMIS or otherwise. Housing provider must then physically observe the participant in the location where the individual or head of household is residing and provide a detailed and certified written account.
  - In the extremely unlikely circumstance that the housing provider is unable to observe the participant in the location where they are residing, the housing provider must also provide reasonable justification why, and then must obtain a credible written certification from the participant detailing dates and location(s) of their homeless episode(s).

NOTE: Projects that serve participants who meet Category 4 but not Category 1 identify eligible clients through the YWCA Domestic Violence hotline, following the Coordinated Entry Prioritization Policy for Victim Service Provider TH/RRH Housing Programs. At enrollment, acceptable evidence as stated above should be obtained.

The oral statement must be documented by either a certification by the individual or head of household; or a certification by the intake worker. At move in, housing provider does not need to obtain further documentation as long as there is no evidence to suggest that the participant no longer meets criteria for Category 4 homelessness.

Although these documentation requirements can be burdensome, housing providers must work diligently to obtain adequate eligibility documentation for all referred eligible participants.

Coordinated Entry (Coordinated Assessment)



HUD requires each CoC to establish and operate a “centralized or coordinated assessment system” (referred to as “coordinated entry” or “coordinated entry process”) with the goal of increasing the efficiency of local crisis response systems and improving fairness and ease of access to resources, including mainstream resources.

Both the CoC and ESG Program interim rules require use of the CoC’s coordinated entry process, provided that it meets HUD requirements. Coordinated Entry processes help prioritize people who are most in need of assistance. They also provide information about service needs and gaps to help communities strategically allocate their current resources and identify the need for additional resources. Each ESG-funded program within the geographic area must use the established Coordinated Access System for all referrals.

STEH operates the local Coordinated Entry System in accordance with locally established policies and procedures, and HUD requirements.

City of Cincinnati and STEH monitor Program Operators to ensure all housing placements are referred directly from Coordinated Entry.

### Determining Appropriate Unit Size

Program operators must consider household size when determining the appropriate unit size. As discussed in the Habitability and Housing Quality Standards section below, program operators may choose to adhere to the minimum standards in 24 CFR 576.403(c) or to adopt the acceptability criteria in 24 CFR 982.401 (taking care to ensure that the fire safety requirements of 24 CFR 576.403(c) are met and documented). Program operators adhering to 24 CFR 982.401 must ensure that the housing unit has at least one bedroom or living/sleeping room for each two persons, and a sufficient number of sleeping rooms so that children of opposite sex, other than very young children, are not required to occupy the same bedroom or living/sleeping room. It is recommended that program operators adhering to 24 CFR 576.403(c) adopt the same acceptability criteria, as it is required that each resident be provided adequate space and security for themselves and their belongings and that each resident must be provided an acceptable place to sleep, but the acceptability criteria for adequate space are not defined in the regulation.

Program operators will follow the guidance below in determining the appropriate unit size for each household.

### APPROPRIATE UNIT SIZE CHART

Unit Size	Minimum Number	Maximum Number
0 Bedroom	1	1
1 Bedroom	1	2
2 Bedroom	2	4
3 Bedroom	3	6
4 Bedroom	4	8

5 Bedroom	5	10
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Details on possible composition:

#### Zero Bedrooms

- 1 adult

#### One Bedroom

- 1 adult
- 1 adult (pregnant)
- 2 adults (spouse or cohabitants)

#### Two Bedrooms

- 1 adult, 1 child
- 1 adult (pregnant)
- 1 adult, 2 children (same sex)
- 1 adult, 2 children (opposite sex, both 5 years or younger)
- 2 adults (spouses or cohabitants), 1 additional adult
- 2 adults (spouses or cohabitants), 1 child
- 2 adults (spouses or cohabitants), 2 children (same sex) - 2 adults, 2 children (opposite sex, both 5 years or younger)
- 2 adults (spouses or cohabitants), 2 adults (spouses or cohabitants)

#### Three Bedrooms:

- 1 adult, 2 children (opposite sex) - 3 adults (not spouses or cohabitants)
- 1 adult, 2 children (same sex), 1 child (either sex)
- 2 adults (not spouses or cohabitants), 2 children (same sex)
- 2 adults (not spouses or cohabitants), 2 children (opposite sex, both 5 years or younger)
- 2 adults (spouses or cohabitants), 2 adults (not spouses or cohabitants)
- 2 adults (spouses or cohabitants), 2 children (same sex), 1 child (either sex) - 2 adults (spouses or cohabitants), 2 children (same sex) 2 children (same sex)
- 2 adults (spouses or cohabitants), 4 children (all same sex)
- 2 adults (spouses or cohabitants), 4 children (opposite sex, all 5 years or younger)

#### Four Bedrooms:

- 4 adults (not spouses or cohabitants)
- 2 adults (not spouses or cohabitants), 2 children (opposite sex)
- 1 adult, 2 children (same sex), 2 children (opposite sex) –
- 3 adults (not spouses or cohabitants), 2 children (same sex)
- 1 adult, 2 children (same sex), 2 children (same sex), 1 child (either sex)
- 2 adults (spouses or cohabitants), 2 children (same sex), 2 children (opposite sex, 5 years or younger)
- 2 adults (spouses or cohabitants), 2 children (same sex), 2 children (same sex), 1 child (either sex)
- 2 adults (spouses or cohabitants), 2 children (same sex), 2 children (same sex), 1 adult

- 2 adults (spouses or cohabitants), 2 children (same sex), 2 children (same sex), 2 children (same sex)
- 2 adults (spouses or cohabitants), 2 children (opposite sex, 5 years or younger), 2 children (opposite sex, 5 years or younger), 2 children (opposite sex, 5 years or younger)
- 2 adults (spouses or cohabitants), 6 children (opposite sex, all 5 years or younger)

A family may select a smaller unit if the dwelling unit contains at least one sleeping room of appropriate size for each two persons and a sufficient number of sleeping rooms so that children of opposite sex aged 6 years or older are not required to share a sleeping room. A living room or dining room can be used as a sleeping room if the family chooses, but the program operator may not require this arrangement.

A participant may not select a larger unit unless there is a documented good reason, and the unit meets both Rent Reasonableness and FMR for size that was determined to be appropriate.

At times, participants may be identified by Coordinated Entry, or through intake discussions or other means, to have family members that may or may not be homeless but could be looking to reunite. When a participant is referred with the intention of reuniting with estranged family members (e.g. children in foster care), The program operator can only allow larger unit sizes if reunification is imminent. The imminence of the reunification must be adequately documented, and may require a legal decision by a court prior to allowing ESG-RRH funds to be spent.

#### Habitability and Housing Quality Standards (HQS)

ESG funds cannot be used to help a program participant remain or move into housing that does not meet the minimum habitability standards provided in 24 CFR 576.403(c). The City of Cincinnati has adopted the more stringent acceptability criteria of 24 CFR 982.401, in conjunction with the following fire safety standards of 24 CFR 576.403(c):

- (i) There must be a second means of exiting the building in the event of fire or other emergency.
- (ii) Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.
- (iii) The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

Efforts will be always made to encourage property owners to provide housing that exceeds HQS minimum standards. The program operator is responsible for assuring that each unit occupied by a ESG program participant meets the HQS and program operator guidelines. Inspections will be conducted and recorded using

form HUD 52580-A, supplemented by the ESG Minimum Standards for Permanent Housing checklist to document the additional fire safety requirements above. All persons performing HQS inspections will read the this HQS policy and the instructions on the inspection form thoroughly prior to completing inspections. While inspections are a required tool for ensuring that HQS are met, program operator will also address HQS deficiencies that become known by means other than an official inspection (e.g. home visits) within the same time standards.

Because it might be a real or perceived conflict of interest, any rental unit owned or managed by program operator will be inspected by an independent contractor for all categories of HQS defined later in this section, except for Move Out/Vacate Inspections which may be performed by program operator staff. In this document, "program operator" will refer to either the program operator or the program operator's contractor, as appropriate.

### Guidelines/Categories of Inspections

All units must comply with all orders issued by any local governing body to enforce such local governing body's local building codes. program operator may search for the property on the Cincinnati Area Geographic Information System (CAGIS) website's CAGIS Activity Report, however the absence of an open code violation case does not certify that the unit is in compliance. In cases where the local governing body has issued any order preventing occupancy of the unit, the unit shall be deemed not to meet the HQS, and the unit shall be terminated from program operator's program.

For purposes of inspections, the term "HQS" refers to the Housing Quality Standards inspection.

### Initial and Annual HQS

Before any initial assistance will be provided on behalf of a program participant, the program operator must physically inspect each unit to assure that the unit meets HQS. Assistance will not be provided for units that fail to meet HQS.

Program operator will make every reasonable effort to conduct initial HQS inspections as expeditiously as possible after the unit has been identified, usually within 1-3 business days. All utilities must be in service prior to the inspection. If the utilities are not in service at the time of inspection, the program operator will notify the property owner to have the utilities turned on. After the property owner notifies program operator that the utilities have been turned on, the program operator will schedule an inspection. Even if eventually the participant will be responsible for paying any utilities, the utilities can be turned on in the name of property owner for the sake of the initial inspection.

Program operator must inspect all units at least annually throughout the participants' residence to ensure that the units continue to meet HQS. Annual unit inspections shall occur within 365 days of the last full inspection.

At all initial and annual inspections, a thorough record will be made of all fail items, and all “Pass with Comment” items. Any item that requires a response of “No” is a fail item. “Pass with Comment” items are deficiencies which do not fail HQS but could potentially become fail items within 12 months.

### Complaint Inspections Requested by the Property Owner or Participant

If a participant reports an issue with their housing regarding HQS that can be easily communicated to the property owner and quickly repaired, they are first asked to request that the property owner remedy the problem. If the participant prefers, program operator staff may request the remedy on their behalf. Program operator staff should follow-up with the participant to verify if repairs have been made within 1-7 calendar days, depending on the severity of the complaint issue(s). If the property owner fails to remedy the issue, a Complaint Inspection will be scheduled as quickly as possible, within 1-14 calendar days considering the severity of the issue(s), with more severe issues requiring earlier intervention.

A Complaint Inspection shall also be performed upon the property owner's request if the participant appears to be causing damages and/or fail items in the unit. Any items which can be identified as damages shall be settled between the property owner and participant through a mutually agreed upon method. Program operator staff will be notified and work with the participant to prevent further damage.

Program operator may also conduct an investigative inspection based on complaints from neighbors, public officials, case managers, or others, provided such complaints include credible allegations that an HQS violation may exist.

The program operator should identify those complaints which involve an exigent situation that may endanger the participant's health or safety (see “Emergency Repair Items”), thereby requiring immediate inspection. Where possible, the inspection should be scheduled so that both parties are present. Upon inspection of the unit, a notice of needed repairs will be provided to the property owner and the participant. The notice will include the date by which repairs must be completed, allowing reasonable time to make repairs, based on the severity and nature of the fail items (See “Time Standards for Repairs”). In cases where inspection confirms an immediate danger, program operator will work with the participant to identify alternate accommodations until the deficiency has been remedied, and program operator has verified that the danger no longer exists. If deemed necessary, program operator will request that a separate inspection be made by the Local Building Department or Health Department.

The Cincinnati Department of Buildings & Inspections: (513) 352-3271 (opt. 9) or (513) 352-3267 (Inspections Related to Building Permits/Construction)

Cincinnati Health Department: (513) 357-7200 or (513) 352-2908 (Mold/Insect/Housing Complaints)

Cincinnati Citizen Service Request: <https://cagismaps.hamilton-co.org>

When conducting a Complaint Inspection, program operator will inspect only the items which were reported, but if the inspector inadvertently notices additional deficiencies that would cause the unit to fail HQS, the responsible party will be required to make the necessary repairs within a reasonable time. The inspector will clearly indicate on the form that the inspection is a complaint inspection, so that it is not mistaken for an incomplete annual inspection.

Quality control inspections and move out/vacate inspections are additional types of inspections that program operators may complete, at their discretion.

### Actions to Follow Failed/Inconclusive Inspections

#### Time Standards for Repairs

Upon completion of an inspection where fail items were discovered, program operator will notify the property owner and participant in writing of needed repairs and a deadline by which repairs must be made. Emergency items which endanger the participant's health or safety must be corrected by the property owner or participant (whoever is responsible) within 24 hours of notification. (See "Emergency Repair Items") For non-emergency items, repairs must be made within 30 days.

Internal Controls shall be used to assure that rental payments are not issued for any unit not in compliance with HQS after the deadline given in the notice of needed repairs.

#### Extensions

Program operator may approve an extension beyond 30 days for final repairs correcting non-emergency HQS deficiencies in cases where documentation confirms the property owner or participant has made a good faith effort to correct the deficiencies and is unable to do so for reasons beyond their control. Temporary measures may be required to mitigate issues while final repairs are in progress. The length of the extension will be determined on a case-by-case basis at the discretion of program operator. For conditions that are Emergency Repair Items, the program operator cannot grant an extension to the 24-hour corrective action period.

Reasons for an extension may include, but are not limited to:

1. An unavoidable delay in completing repairs due to difficulties in obtaining parts or contracting for services;
2. Delays due to climate conditions;
3. Complexity or extensive nature of repairs which make it impossible to complete the repairs by the original due date;
4. Serious illness, death.

The request for an extension must be made in writing to the program operator prior to the due date for repairs, and the HP's response must also be in writing. All pertinent correspondence must be retained in the participant record.

## Re-inspection

Program operator must verify that repairs have been made. On-site re-inspection shall typically be performed to verify the completion of repairs needed for a unit to meet HQS. Instances where onsite re-inspections are not necessary, but where a statement documented by the property owner and participant or program staff and participant is needed certifying the repairs, are:

1. If three or fewer minor repairs, (e.g. slowly dripping faucet that is not creating water damage) have been completed
2. If the repairs can be verified by a completed work order, subject to the scrutiny of program operator staff.

Re-inspections should be scheduled for soon after the deadline for the repair and no later than 35 days after notification of the failed inspection. Re-inspection of severe issues should occur sooner. Program operator will notify the participant and property owner of the appointment date and time for re-inspection of failed items. If neither the property owner nor the participant is present for the re-inspection appointment, a notification of the missed inspection will be left at the unit and HP should immediately contact property owner and participant to re-schedule. Re-inspections will continue to be scheduled until it has been verified that repairs have been made and that the unit meets HQS, and program operator will retain documentation of efforts to verify repairs in the participant file.

## Determination of Responsibility

Certain HQS deficiencies are considered the responsibility of the participant:

1. Participant-paid utilities not in service
2. Failure to provide or maintain participant-supplied appliances
3. Damage to the unit or premises caused by a household member or guest that exceeds normal wear and tear. "Normal wear and tear" is defined as items that cannot be charged against the participant's security deposit under state law or court practice.
4. Dead battery or no battery in smoke detector.

The property owner is responsible for all other HQS violations.

## Consequences if HQS Corrections Cannot Be Verified

If a unit fails re-inspection, or program operator is unable to confirm within 30 days of the deadline for repairs that fail items have been corrected, program operator will begin working with the participant to identify other acceptable housing. Program operators should inform property owners of their responsibility to pass an initial HQS inspection and to maintain units in compliance with HQS prior to the execution of the lease.

## Consequences if a Participant is Responsible

If non-emergency violations of HQS are determined to be the responsibility of the participant, program operator will normally require the participant make any repair(s) or corrections within 30 calendar days. Utility shut-offs must be corrected within 24 hours. Program operator staff will adjust supportive services to work with the participant to prevent further damages.

## Emergency Repair Items

Emergency Repair Items are HQS deficiencies that present an immediate risk to inhabitants' health or safety. Items of an emergency nature that must be corrected by the property owner or participant (whoever is responsible) within 24 hours of notice by the program operator include (but are not limited to):

1. Sewage backup.
2. Utilities are not on (i.e. electric, gas, and/or water).
3. Smoke detector missing, damaged, or missing battery.
4. Electrical outlets and light switch covers that are missing.
5. GFCI outlets that do not function properly (open grounds on GFCI are acceptable).
6. Circuit breaker boxes with open slot or open knock-out hole.
7. Junction boxes missing cover or open knock-outs.
8. Gas stoves that do not light from the pilot.
9. Improper flue connection for furnace or water heater.
10. No heat when outside temperature is below 40°.
11. Flooding.
12. Inability to secure unit (missing windows, broken entry door, etc.).

The program operator will issue a written notification that identifies all emergency fail items. The property owner or participant must make the repair and provide confirmation within 24 hours that the emergency items have been repaired. Program operator will document receipt of any verbal confirmation of repairs in the participant file. All emergency repairs will be verified by program operator by completing a re-inspection. If the subsequent inspection indicates that the repairs were not completed, program operator should begin working with the participant to identify other acceptable housing in the event that repairs are not made.

## Lead-based Paint Requirements

Lead-based paint was not allowed to be used in housing in 1978 and after. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Lead exposure is especially harmful to young children and pregnant women. Before renting pre-1978 housing, lessors must disclose the presence of known lead-based paint and/or lead-based paint hazards in the dwelling. Lessees must also receive a federally approved pamphlet on lead poisoning prevention entitled "Protect Your Family From Lead in Your Home" (EPA -747-K-94-001). The lead-based paint regulations assign this responsibility of these requirements to the lessor. However, it is the



responsibility of the HP to document compliance with these requirements. HPs should have the federally approved pamphlet available at lease signing to ensure the lessee receives a copy.

The HP ("Agent" on the disclosure form), lessor, and lessee must complete the form "Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards" and retain a copy signed by all parties for each housing unit occupied by a CoC program participant.

Visual assessments for applicable lead-based paint requirements must be conducted and recorded using form HUD 52580-A. Because household composition can change quickly, HPs must complete the visual assessment for all applicable housing units regardless of the household composition and document results on the HUD 52580-A. If housing was built in or after 1978, HPs may document compliance by either completing the visual assessment and recording the results on form HUD 52580-A or by marking N/A in the lead-based paint section of the form. To complete the visual assessment, the inspector examines the condition of the painted surfaces on the property and documents if there is evidence of deteriorated paint and if deteriorated paint is present, whether it exceeds the HUD de minimis (minimum) levels. The HUD de minimis levels are calculated differently for interior and exterior paint. A visual assessment does not determine the presence or absence of lead. In order to ensure that the visual assessment accurately assesses and documents the paint condition, all persons completing HQS inspections must complete the HUD Lead Based Paint Visual Assessment Training Course and retain the resulting certificate of completion as documentation of compliance with this requirement. If deteriorated paint is identified in an ESG-assisted unit built prior to 1978 through means other than an official inspection (e.g. home visits or participant report of peeling paint), the program operator will complete a visual assessment and take the appropriate steps after determining whether the amount of deteriorated paint exceeds the de minimis amount.

This manual does not address the lead-based paint requirements in 24 CFR part 35, subparts H, J, and K, as City of Cincinnati does not currently use ESG funds for project-based assistance, rehabilitation, acquisition, leasing, supportive services (other than as part of the tenant-based rental assistance RRH program), or operation. Should the City use ESG funds for any of these types of assistance in the future, any property assisted with renovation activities in a pre-1978 residential structure will require initial paint testing if the assistance exceeds \$5,000 per unit and if the presence of lead-based paint is determined, those disturbed surfaces and any hazards need to be conducted by EPA Renovation, Repair, and Painting certified contractors for projects receiving under \$25,000 per unit or Ohio licensed lead abatement contractors if the repairs exceed \$25,000 per unit. For projects where lead-based paint is addressed, a lead clearance inspection must be conducted. All inspection activities must be performed by ODH licensed risk assessors and inspectors and all reports must be disclosed at the time of lease signing and if the property is transferred.

#### Rent reasonableness and Fair Market Rent (FMR)

Program operators must ensure that the gross rents being charged for the assisted units are reasonable, as described in 24 CFR 982.507. Gross rent is the sum of the monthly rent due to the property owner and an allowance for any utilities that are tenant-paid per the lease. Program operators must use the Allowances for

Tenant Furnished Utilities and Other Services published by the local Public Housing Authority to determine the amount of utility allowance, as well as any standard utility fee associated with utilities for which the participant is responsible. This standard utility fee amount is approved annually by Strategies to End Homelessness (e.g. gas meter charge). Reasonableness is assessed according to two criteria. First, the rent charged for the unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market. Second, the rent charged must not be higher than rents currently charged by the owner (property owner) for comparable unassisted units. The purpose of the requirement is to ensure that no property owner artificially inflates assisted units over comparable unassisted units. At no time should the rent to the owner exceed the reasonable rental amount.

A guidance document provided by HUD, *Reasonableness and Fair Market Rent Under the Continuum of Care*, states that a variety of sources can be used to determine rent reasonableness:

- Rental Market Study
- Rental Market Survey
- Rental database

Rentellect is a system developed by Market Vision Partners (MVP) that uses all these sources with the rental market survey being the most used source. MVP uses it to build a rental database where information is preserved. MVP pulls comparable units monthly and adjusts algorithms at least quarterly. One, two, and three bedrooms are replaced often. Updates are entered into the system as they become available or after one year, whichever comes first. For example, a rental complex advertises new rates, so old rates are deleted, and new rates are entered. Depending on the rarity of a comparable unit, it may stay in the system for a longer period, for example studios and four bedrooms up.

The system shows three to five comparable units at the bottom of each report as available, but the calculation is algorithmic, meaning the calculation is based upon all the comps in a neighborhood group at the time of the set up. A minimum of 40 comparable are needed to run a calculation in a particular neighborhood.

The database is the underlying source of information to develop the calculations that power the tests and comparable list.

Program operators must use Rentellect.com to verify rent reasonableness and the rent reasonableness report must be maintained in the participant record. If adequate comparable units are not displayed on the Rentellect report, Program Operators should contact STEH to resolve the reporting issue. If reporting issues cannot be resolved within the Rentellect system, Program Operators must use HUD's Reasonableness Checklist and Certification (Appendix C) to verify rent reasonableness. In order to determine if a unit is rent reasonable, the Program operator must compare that unit to at least two similar units in the area; this helps identify if the rent that the property owner is charging is reasonable compared to similar units. Comparable units must be similar in several areas including:

- **Location:** The unit must be in an area within the same rental market as the unit being assessed for rent reasonableness.
- **Comparable in Size:** Even if the units have the same number of bedrooms, a one bedroom that is 600 square feet is not comparable to a one bedroom that is 1200 square feet. The units must be similar in the number of bedrooms and square footage.
- **Similar in Type:** To be comparable, the units must be located in the same type of property, such as in a single family home, a multifamily home, an apartment building or a high-rise, etc.
- **Date of Construction:** program operators should take the year the property was constructed into consideration; it would not be appropriate to compare a newly constructed home to a home that was built in 1900.
- **Condition of Property:** When comparing units, program operators should take the condition of the property into account. A rundown property should not be compared to a well-maintained property.
- **Quality of Renovations:** program operators should not compare an upgraded unit to one that has not been renovated. For example, a unit with a newly renovated kitchen with designer grade cabinets, countertops, and appliances should not be compared to a unit with economy grade fittings.
- **Property Amenities and Services:** Projects sponsors should compare units with similar amenities and services, such as a washer and dryer, central air conditioning, designated parking spot, outdoor space, elevator or doorman.
- **Number of Included Utilities:** When comparing units, program operators must take into account any utilities that are included in the price of the rental.

In addition to being reasonable, gross rent for an assisted unit must not exceed FMR, as established annually by HUD. When completing entering unit data into Rentellect, program operator staff must enter the applicable FMR for the unit size in the comment box, and verify that the gross rent for the unit does not exceed this amount.

### Leases and Rental Assistance Agreements

Program operator staff should review all prospective new leases to ensure accuracy and sufficiency of information, and that all of the lease provisions are acceptable. Participants should be instructed not to sign a new lease with the property owner until this review is complete and the property owner has signed an agreement to participate in the ESG program.

The following provisions should be included in the lease or added as a lease addendum:

- Lease term duration should be for a term of at least one full year, and allow for renewal after that period;
- Details about the monthly rent, including amount, payment instructions, due date, and late fee;

- Security deposit amount;
- Requirement of last month's rent payment with security deposit, if applicable;
- First and last names of all occupants who will be living in the unit;
- List of all utilities paid by the property owner and those to be paid by the participant, including the fuel type where applicable (e.g. gas or electric cooking);
- List of appliances to be provided by the property owner;
- Explanation of property owner's responsibility for maintenance and services;
- Condition(s) necessary for eviction;
- Prohibition against discrimination; and
- VAWA protections and confidentiality requirements as described in section 11 of this manual.

The lease should not contain any of the following provisions:

- Agreement to be sued. Agreement by the participant to be sued, admit guilt or to a judgement in favor of the owner in a lawsuit brought in connection with the lease;
- Treatment of property. Agreement by the participant that the property owner may take, hold, or sell personal property of household members without notice to the household and a court decision on the rights of the parties<sup>1</sup>;
- Excusing the property owner from responsibility. Agreement by the participant not to hold the property owner or the property owner's agents legally responsible for any action or failure to act, whether intentional or negligent;
- Waiver of notice. Agreement by the participant that the property owner may institute a lawsuit without notice to the participant;
- Waiver of legal proceedings. Agreement by the participant that the property owner may evict the participant or household members without instituting a civil court proceeding in which the participant has the opportunity to present a defense, or before a court decision on the rights of the parties;
- Waiver of right to appeal court decision. Agreement by the participant to waive the participant's right to appeal, or to otherwise challenge in court, a court decision in connection with the lease;

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<sup>1</sup> This prohibition does not apply to an agreement by the tenant concerning disposition of personal property remaining in the housing unit after the participant has moved out of the unit. The owner may dispose of this property in accordance with state law.

- Participant chargeable with cost of legal actions regardless of outcome. Agreement by the participant to pay attorney's fees or other legal costs even if the participant wins in a court proceeding by the property owner against the participant<sup>2</sup>;
- Payment of additional rent or fees (except pet fees) to the property owner. Agreement by the participant to pay additional rent or fees out of pocket to the property owner once occupancy takes place; or
- Any other provision that violates state property owner -tenant law or ESG program requirements.

The lease should allow the property owner to terminate, or refuse to renew, the lease only for the following reasons:

- Serious or repeated violation of the terms and conditions of the lease;
- Violations of applicable Federal, state, or local law; or
- For other good cause.

A copy of a fully executed lease for all ESG-assisted units must be retained in the participant record. If multiple versions of a lease exist, such as unexecuted or partially executed leases, they must be clearly labeled to avoid confusion.

A rental assistance agreement must be in place between the property owner and Program operator before payment of rental assistance may begin. This agreement is intended to clarify the rights and responsibilities of each party, and should include:

- Property owner contact information;
- Details of all costs associated with the unit (monthly rent amount, due date, late fee<sup>3</sup>, grace period, security deposit and last month's rent if applicable);
- List of all utilities paid by the property owner and those to be paid by the participant, including the fuel type where applicable (e.g. gas or electric cooking);
- Overview of the rental assistance program process;
- Property owner acknowledgement and acceptance of rental assistance program requirements, including initial and continued compliance with HQS, state and local laws governing property owner and tenant relations, VAWA, and program rules related to such issues as return of deposits, conflict resolution, and required notifications;

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<sup>2</sup> Participant may be required to pay legal costs if participant loses.

<sup>3</sup> ESG funds can never be used to pay late fees. Late fees incurred by the Program must be paid with non-ESG funds.

- Additional program procedures, such as a statement of staff availability to help resolve problems with participant rent payment or behavior.

## Documenting and Calculating Participant Income

The requirements for determining whether an individual or family is eligible for continued rapid rehousing assistance at the time of re-evaluation, and the amount of rent the individual or family will pay, require the program operator to project or estimate the annual income that the family expects to receive. Generally, the agency must use current circumstances to project anticipated income. Annual income is projected by annualizing current income. Income that may not last for a full 12 months (e.g., unemployment compensation) should be calculated assuming current circumstances will last a full 12 months. If changes occur later in the year, an interim recertification can be conducted to change the family's rent and re-evaluate eligibility. If information is available on changes that will occur during the year, income must be re-evaluated and documented from all know sources when the change occurs.

At a minimum, program operators must document participant income, in accordance with 24 CFR 5.609 and 5.611 (see Appendix D):

- At Project Start Date, on the following occasions:
- At Housing Move-in Date if this date is more than 30 days after the Project Start Date,
- When changes in income are identified, and
- At least once every three calendar months that the participant is enrolled in the RRH project, and
- At annual assessment within 30 days of the participant's project start date anniversary.

RRH programs are required to use the CoC-approved income evaluation form when the participant has income (unless that income is a fixed monthly amount, such as SSI, SSDI or OWF in which case a current print out of monthly amount is sufficient) and must obtain a self-declaration of zero income when the participant has no income reportable income under HUD guidelines. Program operators must adhere to the following order of priority in obtaining income documentation:

- 1) Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement) are optimum income documentation.
- 2) If source documents are unobtainable, the program operator may obtain a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the program operator's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available AND document reasonable steps taken by the program operator staff to obtain source documentation; or

- 3) If source documents and third party verification are unobtainable, the program operator may obtain the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation, AND document reasonable steps taken by the program operator staff to obtain source documentation followed by third party verification.

The documentation of income, including self-declarations, must be obtained at each income evaluation, and recorded in HMIS at intake, when changes in income are identified and at least annually.

### Calculating the Amount of Assistance

For many households, payments necessary to retain housing is their largest monthly expense. Therefore, the RRH project should determine and communicate a participant's monthly rental obligation with ample time for the participant to shoulder the expense.

### Eligible Move-in Costs are:

- Security Deposits: A maximum of two times the monthly rent for a unit is allowed. At times, a relocation may warrant additional security deposits for new location.
- Last month's rent: If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and, although it must be categorized as Housing Relocation and Stabilization Services- Financial Assistance, it also must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.
- Utility Deposits: If, to begin utility service, a standard deposit to a utility company is eligible and the RRH project may assist with this deposit. Utility deposits must be a one-time fee, paid to utility companies. Eligible utility services are gas, electric, water, and sewage.
- Utility Arrears: Gas, electric, water, and sewage utility arrears may be paid with ESG funds as a move-in cost, subject to the limitations described below under Utility Assistance.
- First month's rental assistance payments: The project must pay the first calendar month's rent as rental assistance on behalf of a participant. A partial month counts as one month in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.

### Eligible housing costs after move-in are:

- Utility Assistance: ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a monthly utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a

utility company or proof of responsibility to make utility payments for the ESG-assisted unit. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period. Utility assistance payments may never exceed the amount of the actual utility expense.<sup>4</sup>

- Rental Assistance payments: The project may provide tenant-based rental assistance on behalf of a participant for up to 24 months, however, the amount of rental assistance paid must be determined by the participant and the Program Operator at least every three calendar months. RRH projects are required to follow the community's process for determining financial assistance as described in this document.

All of these costs must be categorized as Housing Relocation and Stabilization Services- Financial Assistance, with the exception of current rental payments, which are rental assistance. As noted above, last month's rent is categorized as a service.

#### *Initial Subsidies (Calendar Months 1-3)*

RRH projects must pay 100% of the rent due for the calendar month of the housing move-in date. As a general rule, projects will also pay 100% of the other move-in costs for the participant as required by the lease or utility company, with the exception of utility arrears, which will be considered for payment on a case-by-case basis, keeping in mind that arrears must be included in the calculation of the 24 month limit on utility assistance. The project will pay 100% of the monthly rent for the second and third months if subsequent assistance is needed. In general, the project will pay utility assistance in the lower amount of the utility allowance and the actual documented expense in the second and third month. On a case-by-case basis, the project may elect to pay an amount exceeding the utility allowance, but no more than the documented expense. In these cases, the rent calculation worksheet must be accompanied by a justification for the decision to pay more than the utility allowance.

#### *Subsequent Subsidies (Calendar Months 4+)*

Beginning with the fourth month of rental assistance and continuing until the participant is exited, up to a total of 24 calendar months of rental subsidy (including the last month even if paid at move-in), participants are required to pay as a contribution towards gross rent the higher of:

- 30% Household's monthly adjusted income
- 10% Household's (monthly) gross income

Beginning with the 4<sup>th</sup> calendar month of rental assistance, a rent calculation form shall be generated whenever the following circumstances occur:

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<sup>4</sup> When using Winter Rule to avoid disconnection or to reconnect utility service, the participant's full balance is their actual expense, even if it exceeds the amount required per Winter Rule to maintain service. When a participant is enrolled in the Percentage of Income Payment Plan (PIPP Plus), the total utility bill is the actual expense, regardless of the amount of the PIPP payment, because if the participant does not pay their portion on time, they do not receive the subsidy.



- Whenever income changes,
- When household composition changes,
- At the request of the participant household, or
- Otherwise, at least once every three calendar months

Unless a new form is generated in the interim, these rent calculation forms shall be valid for the following three calendar months.

*Example: Income is recorded on March 14<sup>th</sup>. A rent calculation form is created at the same time. That form shall be valid for rents paid on April 1<sup>st</sup>, May 1<sup>st</sup> and June 1<sup>st</sup>, unless income changes in that period (in which case a new Rent Calculation form will need to be generated).*

Eligibility for months of assistance does not imply that additional assistance is necessary or even appropriate. Ensuring that participants receive the “lightest touch” necessary ensures that the RRH project can assist the maximum number of participants and participants can achieve independent stability.

RRH projects are required to use the CoC-approved resident rent calculation worksheet and income evaluation forms to make a rental determination. Both must be retained with their appropriate documentation in the participant’s file. Income adjustments for the purposes of determining monthly adjusted income are defined with the CoC-approved rental calculation form. The gross rent calculation must incorporate the applicable utility allowance established by the local Public Housing Administration<sup>5</sup> for the utilities identified as the participant’s responsibility in the lease, in addition to any standard utility fee as approved annually by the recipient. In general, the project will pay the utility company the amount that exceeds the project participant’s share of the gross rent, provided that amount does not exceed the documented actual utility expense. If the actual utility expense is lower, the project pays that amount. On a case-by-case basis, the project may elect to pay an amount exceeding the calculated project utility responsibility, but no more than the documented expense. In these cases, the rent calculation worksheet must be accompanied by a justification for the decision to pay more than the utility allowance. Additional information on utility assistance is found in the section of this manual addressing Housing Relocation and Stabilization Services.

A Resident Rent Calculation Worksheet prepared for a given month is valid for up to three (consecutive) months in total. The calculation form should clearly identify which month(s) the form is applicable for.

#### Waivers of Participant Rent

It is expected that some participants may be challenged by paying a portion of their rent. Under exceptional circumstances, projects may waive up to the entire amount of the participant’s monthly rental portion, so that income can be used to pay expenses, existing debts and/or respond to circumstances that present barriers to present or future housing stability, such as:

- Payment of debts owed to subsidized housing

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<sup>5</sup> Please note that utility allowances change annually effective January 1st; RRH projects are required to use the current utility chart when calculating participant rents.

- Payment of outstanding utility arrears
- Legal Fees
- Incidents that occur that present barriers to the client, e.g. vehicle breakdowns, theft, etc.

All waivers must be requested using the CoC-approved waiver form which will identify the need. The form must be accompanied by appropriate documentation of the circumstances of the need and reasonableness of the amount waived, for example a mechanic's quote for car repair costs or a utility bill indicating arrears due. The amount waived should not exceed the expense/burden imposed. The form must be approved by the agency's RRH Project Manager or equivalent.

Waivers may only be approved for a period of one (1) month at a time. A participant can receive more than one (1) month of waived rent, but no more than three (3) months during their participation in the project, and each month must have a waiver form package approved by the RRH Project Manager or equivalent.

Example of waiver implementation: A participant was robbed recently. The case worker prepares a waiver form indicating the barriers presented by the event and attaches a police report that indicates that \$300 in cash was stolen. Up to \$300 of the participant's rental portion could be waived for the month. The RRH project manager signs off on the packet.

## Housing relocation and stabilization services

### Financial assistance costs.

Eligible costs, other than rental assistance, for which ESG funds are used to make payments to housing owners, utility companies, and other third parties are categorized as financial assistance costs and must be tracked and reported separately.

1. Rental application fees. ESG funds may pay for the rental housing application fee that is charged by the owner to all applicants.
2. Security deposits. ESG funds may pay for a security deposit that is equal to no more than 2 months' rent.
3. Last month's rent. If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.
4. Utility deposits. ESG funds may pay for a standard utility deposit required by the utility company for all customers for gas, electric, water, and/or sewage.

5. Utility payments. ESG funds may pay for utility payments made directly to the utility company on behalf of the program participant to pay for gas, electric, water, and sewage costs for the housing unit. Telephone, internet, and cable are not eligible utilities. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments, and the payment amount may never exceed the actual utility cost. Utility payments made with ESG funds may not exceed 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service in any 3-year period. A partial payment of a utility bill counts as one month.
6. Moving costs. ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under the following Services Costs section and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.
7. If a program participant receiving short- or medium-term rental assistance meets the conditions for an emergency transfer under the VAWA Section of this document, ESG funds may be used to pay amounts owed for breaking a lease to effect an emergency transfer. These costs are not subject to the 24-month limit on rental assistance under § 576.106.

#### Services costs

ESG funds may be used to pay the costs of providing the following services:

##### *Housing search and placement.*

Services or activities necessary to assist program participant in locating, obtaining, and retaining suitable permanent housing, include the following:

1. Assessment of housing barriers, needs, and preferences;

Program operators must complete an assessment of each participant's housing history and preferences. The assessment should be conducted using a trauma-informed approach, and will vary somewhat based on the individual participant, however in general it will address questions such as:

- What action, behavior or circumstances led to housing problems?
- In what setting has the participant been happiest and most stable? What settings did not work?
- What supports are needed for the participant to enter and maintain stable housing?

During the assessment process, Program operator should also review and discuss with the participant what housing options and resources are available.

2. Development of an action plan for locating housing;

Using the assessment results, the participant and case manager work together to establish a case plan that includes agreed-upon supportive services needs and goals. Case plans should be individualized to the needs of the participant and note which parties are responsible for which tasks or interventions. Goals should be written to include the following:

- Statement of goal(s) the participant plans to achieve
- Action steps designed to attain the goal(s)
- Timeframe for achieving the goal(s) and completing action step(s)
- Specific outcome(s) to achieve
- Support needed to achieve goal(s)
- Tasks to be accomplished by the participant and the housing case manager

Case plan goals must be participant-driven but should be focused on quickly identifying, and moving the participant into, appropriate housing.

3. Housing search;
4. Outreach to and negotiation with owners;
5. Assistance with submitting rental applications and understanding leases;
6. Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness;
7. Assistance with obtaining utilities and making moving arrangements; and
8. Tenant counseling.

*Housing relocation and stabilization services.*

ESG funds may be used to pay the cost of assessing, arranging, coordinating and monitoring the delivery of individualized housing stabilization services to a program participant already in permanent housing (not to exceed 24 months) or to assist a program participant to overcome immediate barriers to obtaining housing (not to exceed 30 days). Program operators are required to provide case management to all clients receiving homelessness prevention and rapid rehousing services. Clients receiving short- and medium-term rental assistance are required to be provided with case management and have a housing stability service plan. Case management includes the following services:

1. Conducting initial evaluation, including verification and documentation of eligibility

An initial evaluation may be completed in conjunction with the assessment of housing barriers for housing search and placement or may be conducted once the participant is in housing.

2. Developing, securing and coordinating services
3. Obtaining federal, state, and local benefits
4. Monitoring and evaluating participant's progress in the program

Assessment should be ongoing, completed at a minimum annually.

5. Developing an individualized housing stability service plan;

Once the participant is in housing, the case plan should be revised to shift the focus towards maintaining housing. As with the housing search action plan, the housing stability case plan should be individualized to the needs of the participant and note which parties are responsible for which tasks or interventions. Goals should be written to include the following:

- Statement of goal(s) the participant plans to achieve
- Action steps designed to attain the goal(s)
- Timeframe for achieving the goal(s) and completing action step(s)
- Specific outcome(s) to achieve
- Support needed to achieve goal(s)
- Tasks to be accomplished by the participant and the housing case manager

Case plan goals must be participant-driven but should include short-term and long-term goals and action steps for alleviating risks of homelessness/loss of essential utilities, establishing affordable permanent housing stability, increasing or maintaining income supports, and improving access to health care and supportive services.

Case plans should be treated as living documents to be updated regularly as existing goals are met, new goals are identified, or the participant's situation changes. In addition to participant progress, all referrals and efforts on the part of program operator to connect participants to other housing assistance should be documented in case notes.

It is highly recommended that program operators work with participants to create a budget in conjunction with their case plan. The budget should be based on actual income and expenditures and can be used to understand household spending patterns. For example, a budget could assess the last 30 days of income and expenditures to better understand recent spending and determine current available financial resources. The case plan, with the budget, could address money management issues (particularly if housing instability is related to poor money

management practices, such as the use of credit cards or cash for non-essential items or entertainment activities).

#### 6. Conducting re-evaluations of participant's eligibility and types and amounts of assistance needed

(reserved) Shared Housing

#### Exit Planning and Termination of ESG RRH Assistance

Preparing a participant for exit should start on day one of their time in ESG RRH. Rapid re-housing assistance should end and the case should be closed when the participant is no longer going to be imminently homeless. In some instances, case management may continue after financial assistance ends, if appropriate or requested by the household. For those that will require ongoing support after exiting the rapid re-housing program, case managers should provide participants with warm handoffs to mainstream and community-based services that will continue to assist them. The decision to conclude assistance requires the evaluation of a number of factors. It should not be based upon arbitrary deadlines or spending limits. Instead, the case manager should look for indicators that the housing is not at imminent risk due to rental or lease compliance issues or an inability to receive essential community resources. If a program participant violates program requirements, the Program operator may terminate the assistance in accordance with a formal process established by the Program Operator that recognizes the rights of individuals affected. The Program operator must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:

- (1) Written notice to the program participant containing a clear statement of the reasons for termination;
- (2) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- (3) Prompt written notice of the final decision to the program participant

Termination under this section does not bar the Program operator from providing further assistance at a later date to the same family or individual.

## 14.2 Emergency Shelter Component

### Low Barrier Shelter

### Non Discrimination/Equal Access

### Coordinated Access

### Essential Services

### Shelter Operations

### Minimum Standards

## 15. Coordination with Mainstream Resources

The Program operator must coordinate with mainstream resources to assist each program participant, as needed, to obtain:

- (1) Appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; and
- (2) Other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, including:
  - (1) Public housing programs assisted under section 9 of the U.S. Housing Act of 1937 ([42 U.S.C. 1437g](#)) ([24 CFR parts 905](#), [968](#), and [990](#));
  - (2) Housing programs receiving tenant-based or project-based assistance under section 8 of the U.S. Housing Act of 1937 ([42 U.S.C. 1437f](#)) (respectively [24 CFR parts 982](#) and [983](#));
  - (3) Supportive Housing for Persons with Disabilities (Section 811) ([24 CFR part 891](#));
  - (4) HOME Investment Partnerships Program ([24 CFR part 92](#));
  - (5) Temporary Assistance for Needy Families (TANF) ([45 CFR parts 260-265](#));
  - (6) Health Center Program ([42 CFR part 51c](#));
  - (7) State Children's Health Insurance Program ([42 CFR part 457](#));
  - (8) Head Start ([45 CFR chapter XIII](#), subchapter B);

(9) Mental Health and Substance Abuse Block Grants ([45 CFR part 96](#)); and

(10) Services funded under the Workforce Investment Act ([29 U.S.C. 2801](#) *et seq.*).

## 16. Homeless Participation

City of Cincinnati, STEH, and program operators must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the recipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG). This requirement is included in the funding agreement between STEH and the program operators, and STEH monitors for compliance as part of the annual monitoring process. In addition to the board of directors of the individual agencies, there are currently two designated seats on the CoC Board reserved for persons with lived experience.

To the maximum extent practicable, the program operator must involve individuals and families with lived experience of homelessness in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

STEH has at least one dedicated seat on the Board of Directors for a person with lived experience that must be always filled.

The Homeless Clearinghouse, aka the CoC Board, has two seats dedicated to persons with lived experience.

Program Operators must maintain one seat dedicated on the Board of Directors for persons with lived experience. On behalf of the City of Cincinnati, STEH monitors Program Operators for board participation and for involvement of individuals and families with lived experience of homelessness in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG.

Routine feedback from persons with lived experience is incorporated into community decision making processes during focus groups, advisory committees, think tanks, surveys, etc.

## 17. Homeless Management Information System (HMIS)

All ESG program operators must ensure that data on all persons served, and all activities assisted, with ESG funds are entered into the community-wide Homeless Management Information System (HMIS), in accordance with current HUD data standards. Program operators may enter data directly into the community's HMIS, or contribute data via an application programming interface (API).

If the subrecipient is a victim service provider or a legal services provider, it must use a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports



based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

The community's designated HMIS is Clarity, by Bitfocus. STEH serves as the CoC's HMIS lead agency and operates the system in accordance with HUD's requirements and extensive community policy, including Data Quality Plan, Privacy and Security Plan, and HMIS Policies and Procedures.

STEH requires participation in subaward agreements with Program Operators and monitors for compliance with all plans and policies at least annually and prior to reporting to HUD.

## 18. Subrecipient Risks

Risk assessment is a methodology used to identify and analyze the relative risk that program operators pose to the community. The process gives staff consistent data to develop monitoring strategies to manage risk.

Risk assessment involves analyzing available data to identify possible risks that could prevent the community from meeting its program objectives and determine which programs and program operators are most susceptible to waste, fraud, and mismanagement. STEH assesses each federally-funded agency's risk to the community in an annual risk assessment and then ranks the agencies by level of risk. This process helps determine the relative risk to the community, as well as to City of Cincinnati as the ESG Recipient and to STEH as the subrecipient. The risk assessment process informs the level of monitoring each agency receives, and when Annual Monitoring reviews may occur.

STEH staff completes a separate agency risk assessment prior to Annual Monitoring, and the results of this assessment direct the scope of the monitoring.

### Risk Identification

Each program has different or unique indices of risk; therefore, STEH staff members consider many factors, including unique or individual circumstances that may contribute to or increase the risk that program objectives will not be achieved. Staff members at all levels of STEH are involved in risk identification. This allows input from those closest to program operations, while maintaining appropriate management oversight and control. The major steps in identifying risks include:

- Identifying program types and objectives to determine what is to be assessed.
- Soliciting feedback from STEH staff members with knowledge of the project and/or agency.
- Reviewing documentation of past and current program operator performance.
- Developing risk-based methods to rate program operators, programs, and functions, including assessing the potential for fraud, waste, and mismanagement.
- Establishing criteria for risk profiles. The risk profiles, which summarize the individual risk identified with a particular program operator (or program activity), help determine the level of resources required to fulfill monitoring responsibilities.

### Risk Analysis

Once potential risks have been identified, they are analyzed quantitatively and qualitatively. Risk analysis generally includes the following:

- Estimating the level of risk
- Assessing the frequency/likelihood of occurrence
- Considering how best to manage the risk
- Determining the actions to be taken

Once risks have been analyzed, STEH monitors must develop a strategy to manage the risk. Strategies can vary considerably from one program or administrative function to another, but all approaches should be designed to keep risk within the levels established by STEH. Once the approach has been implemented, it should be monitored and tracked for effectiveness.

### Risk Criteria and Rating Systems

Risk assessment factors are the criteria for determining:

- Risk exposure to STEH (if applicable)
- Risk exposure to the community
- Likelihood that a program operator has failed to comply with program requirements
- That the program operator has performed unacceptably

STEH develops factors that relate to overall program success and design, and other factors that evaluate performance in a specific program activity. As a result, program operators who pose a higher risk should be subject to increased or more comprehensive monitoring. An important consideration in selecting factors is ensuring that reporting systems provide necessary performance information about the program operators. Using the evaluation tools, each program within the CoC is assessed, and a monitoring strategy is developed as a result of that assessment. There are six central categories of risk that should be used in all programs:

**Financial** - The extent to which a program operator accounts for and manages financial resources in accordance with approved financial management standards. Financial risk also includes the amount of potential monetary obligation to the community, as well as financial risk posed to STEH if STEH is the primary grant recipient.

**Physical** - The extent to which funded physical assets are maintained and operated according to established standards.

**Management** - The extent to which the program operator has the capacity to carry out HUD programs according to established requirements.

**Satisfaction** - The extent to which program participants express satisfaction or dissatisfaction with the delivery of program services.

**Services** - The extent to which program operators effectively and efficiently deliver services to intended beneficiaries/participants.

**Outcomes/outputs** – The extent to which the program or activity achieves the goals of the program.

Because program goals, objectives, and operations vary, the Homeless Clearinghouse and STEH Compliance staff give these categories appropriate consideration. For example, participant satisfaction may or may not be an indication of whether a program operator is meeting program requirements. Examples of criteria that should be considered in developing specific risk factors are:

- Age of project/development/physical asset
- Types/mix of program activities
- Amount of current/total funding obligated and/or expended
- Physical condition of project/development/physical asset
- Management problems
- New management or key staff who are inexperienced or are likely to have performance problems
- Performance indicators, such as how actual number of participants compares to project capacity
- First-time program operators or activity
- Time elapsed since last non-routine remote monitoring
- Time elapsed since last annual monitoring
- Audits/investigations
- Other factors, such as complaints filed by program participants
- A history of demonstrated lack of performance by program operators

## Data Sources

There are several sources that can be used to collect data when conducting risk assessment. Some of those sources are listed below, though not every source is applicable in every situation.

- Client feedback
- HMIS Data
- Annual reports
- Annual Performance Reports
- Audits, Subpart F supplemental compliance reports, and corrective action plans
- Supporting documentation from billings
- Previous STEH monitoring reports
- Other governmental entities as appropriate
- Internal data from STEH resources, including:
  - Consolidated Plans
  - Fair Housing Assessment for Cincinnati and Hamilton County
  - Data from grant recipients
  - Input from STEH staff knowledgeable of program operator performance

## Procedures for High-Risk Program operators

Program operators identified as high-risk through the risk assessment or through other means, will be subject to additional conditions or sanctions. Conditions will vary depending upon the nature of the issue and severity of the perceived risk. The following represent some, but not all, possible conditions/sanctions:

- Require additional reporting
- Require additional documentation for reimbursement
- Require additional monitoring
- Require additional training, and/or technical or management assistance whether by STEH staff, community partners, or expert consultants
- Establish prior approvals
- Delay entering into funding agreement until evidence of acceptable performance
- Withhold payments until evidence of acceptable performance
- Disallow applications for additional funding until acceptable performance is verified
- Disallow new participant intakes until acceptable performance is verified
- Disallow advance payments

It is required that high-risk program operators receive at least one annual monitoring. If follow-up monitoring is required, the annual monitoring plan will be updated as necessary.

High-risk program operators are required to keep in regular contact with STEH staff regarding the progress on improvements of their projects and to attend STEH sponsored community-wide trainings and workgroups.

The City of Cincinnati monitors STEH as the Subrecipient for ESG Rapid Re-Housing and Shelter activities. The reviews includes desktop compliance checks with submitted invoicing, audits, and oversight provided to the program operators. The City is represented and participates at minimum in each annual monitoring for all program operators and assists STEH as necessary in order to achieve compliance.

## 19. Financial Management

Inadequate financial records can lead to serious problems and the possible recapture of funds. Accounting systems must provide reliable, complete, and up to date information about sources and uses of funds. The financial management system of each non-federal entity must provide for the following in accordance with 2 CFR 200:

- Identification, in its accounts, of all Federal awards received and expended and the Federal programs under which they were received. Federal program and Federal award identification must include, as applicable, the Assistance Listings title and number, Federal award identification number and year, name of the Federal agency, and name of the pass-through entity, if any.
- Accurate, current, and complete disclosure of the financial results of each Federal award or program in accordance with the reporting requirements set forth in §§ 200.328 and 200.329. If a Federal awarding agency requires reporting on an accrual basis from a recipient that maintains its records on other than an accrual basis, the recipient must not be required to establish an accrual accounting system. This recipient may develop accrual data for its reports on the basis of an analysis of the documentation on hand. Similarly, a pass-through entity must not require a subrecipient to establish an accrual accounting

system and must allow the subrecipient to develop accrual data for its reports on the basis of an analysis of the documentation on hand.

- Records that identify adequately the source and application of funds for federally-funded activities. These records must contain information pertaining to Federal awards, authorizations, financial obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation.
- Effective control over, and accountability for, all funds, property, and other assets. The non-Federal entity must adequately safeguard all assets and assure that they are used solely for authorized purposes. See § 200.303.
- Written procedures to implement the requirements of § 200.305, Federal Payment.
- Written procedures for determining the allowability of costs in accordance with subpart E of 2 CFR 200 and the terms and conditions of the Federal award and any subawards.

### 19.1 Recipient

The authorizing ordinance includes a schedule of the budget. Line items include administration, rapid re-housing, and shelter allocation. These separate accounts are established in the City of Cincinnati's accounting system (CFS) and are utilized in order to stay within the approved allocations. With the authoring ordinance, the Cincinnati Law Department drafts funding agreements with STEH. A subrecipient agreement is executed for rapid re-housing activities and shelter operations. A contractor agreement is executed for the administration funds. The City operates on a fiscal calendar year from July 1<sup>st</sup> through June 30<sup>th</sup>. The contractor agreement has a term that coincides with the City's fiscal year. The entitlement programs operate on a calendar year and the ESG subrecipients have an annual term from January 1<sup>st</sup> through December 31<sup>st</sup>.

The funding agreements outline the method of tracking, obligation expenditures, payment deadlines, term, amount, record keeping requirements, and scope of work and budget. STEH may request payment for reimbursement on a monthly basis with supporting documentation.

### 19.2 Subrecipient

The STEH Board of Directors approves an annual budget for the STEH calendar fiscal year, as well as a corporate resolution authorizing STEH to receive funds from multiple governmental jurisdictions, and a corporate resolution authorizing STEH to enter into subawards with multiple subrecipients. The board approved budget includes the nature and the function of expenses and revenue. STEH operating expenses are tracked in the accounting system by nature, function, and specific funding source. Additionally, subawards are also tracked by grant component, grant line item, subrecipient, award year, and award number.

Subawards are issued by the STEH Compliance Department and signed by the President/CEO or the Managing Director. Subawards funded with federal funding contain all the necessary elements per 2 CFR §200.332.

Specific grant budgets are tracked in spreadsheets, and all subawards are tracked in our grant management system (Microix) which integrates with our accounting system (Abila MIP). When a subaward is executed, the corresponding budget is submitted to Finance for posting in MIP. This allows the STEH Compliance Department to submit electronic invoices via Microix to finance for review and processing. The invoices submitted to

Compliance must be accompanied by supporting documentation. An ACH is initiated by the finance department within two business days of receiving grant funds in the STEH account.

## 20. Method and Tracking System to Meet Obligation, Expenditure, and Payment Deadlines

Obligation of Funds allocated to City of Cincinnati: Within 180 days after the date that HUD signs the grant agreement (or a grant amendment for reallocation of funds), City of Cincinnati must obligate all the grant amount, except the amount for its administrative costs. This requirement is met by an agreement with, or a letter of award requiring payment to, a subrecipient; a procurement contract; or a written designation of a department within the government of the recipient to directly carry out an eligible activity.

City of Cincinnati must draw down and expend funds from each year's grant not less than once every 90 days of the program year. All of City of Cincinnati's grant must be expended for eligible activity costs within 24 months after the date HUD signs the grant agreement. For the purposes of this section, expenditure means either an actual cash disbursement for a direct charge for a good or service or an indirect cost or the accrual of a direct charge for a good or service or an indirect cost.

City of Cincinnati must pay each subrecipient for allowable costs within 30 days after receiving the subrecipient's complete and accurate payment request.

## 21. Recordkeeping Requirements

All responsible entities must implement appropriate recordkeeping and reporting procedures to document that ESG funds are used in accordance with the requirements. These records must allow City of Cincinnati and HUD to determine whether ESG requirements are being met.

Subrecipients are required to keep records of the following:

- Coordinated entry system procedures, including written intake procedures developed by the Continuum of Care in accordance with the requirements established by HUD
- Rental assistance agreements and payments, including copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments including dates of occupancy by program participants
- The monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction
- Compliance with the shelter and housing standards including inspection reports

- Types of services provided under ESG, including rental assistance, housing stabilization, and relocation services, and the amounts spent on these services and assistance
- Compliance with the requirements for consulting with the Continuum of Care and coordinating and integrating ESG assistance with programs targeted toward persons experiencing homelessness and mainstream service and assistance programs
- Participation in HMIS or comparable database
- Records of the source and use of contributions made to satisfy the matching requirement
- Compliance with organizational conflicts-of-interest requirements in 24 CFR 576.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in 24 CFR 576.404(b), and records supporting exceptions to the personal conflicts of interest
- Compliance with all relevant requirements including: homeless participation, faith-based activities, nondiscrimination and equal opportunity, uniform administrative requirements, environmental review including flood insurance, lobbying and disclosure certifications and forms, and displacement, relocation and acquisition.
- Documentation of how ESG funds were spent on allowable costs in accordance with the requirements for eligible activities
- Receipt and use of program income
- Procurement contracts and documentation of compliance with the procurement requirements
- Written confidentiality procedures to ensure:
  - All personally identifying information of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential.
  - The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter.
  - The address or location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.
- Program participant records

## 22. Record Retention

The record retention period begins from the annual date of submission of the grantee's Consolidated Annual Performance and Evaluation Report (CAPER) in which the specific activity is reported on for the final time rather than from the date of submission of the final expenditure report for the award unless there is litigation, claims, audit, negotiation, or other actions involving the records, which has started before expiration of the five year period. In such cases, the records must be retained until completion of the action and resolution of all issues which arise from it or the end of the regular five-year period, whichever is longer.

Each subrecipient is required to maintain documentation on clients benefiting from activities and programs funded through the City's ESG program. Information to be retained includes:

- Client name and address
- Gender
- Ethnicity/race
- Head of household status
- Income
- Application for assistance, if applicable
- Client Income Documentation
- Documentation as to services provided
- Pre- and post-program evaluations, if applicable

### Accounting Records

Financial record keeping is one of the primary areas subject to HUD reviews and one which, if inadequate, can lead to serious problems and the possible recapture of funds. Accounting systems must provide reliable, complete, and up to date information about sources and uses of funds. These are the financial information and records that must be maintained by the agency:

- A computer accounting system that records the source of income and categorizes expenses for grant activities;
- Written accounting procedures, chart of accounts, written internal controls, administrative controls, accounting journals and ledgers;
- Payment requests and source documentation e.g. bills, receipts, copies or cancelled checks, etcetera;
- Comparison of actual checks written with budgeted amounts for each grant;
- Written procedures for determining what's reasonable and allowable under 2 CFR Part 200 for costs and activities;
- Procurement files, i.e., bids, contracts, legal notices, etc.



- Bank account and payroll records; and
- Financial statements, correspondence, and audit files.

Records pertaining to ESG activities must be kept separately, keeping control over all grant funds, property/equipment, and other assets purchased with ESG funds.

## 23. Access to Records

The City, HUD, and the Comptroller General of the United States, or their authorized representatives, have the right to access subrecipient agency program records. All ESG grantees are required to provide citizens with reasonable access to records regarding the currently funded programs and past, consistent with applicable State and local laws regarding privacy and confidentiality.

All personally identifying client information must be redacted prior to sending to the City for review.

## 24. Consolidated Plan

### 24.1 5-year Consolidated Plan

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, of which includes Emergency Solutions Grant (ESG). 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 Annual Action Plan (budget) 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 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 grant programs to meet local needs. The Consolidated Plan includes the following sections: The Process, The Needs Assessment, The Housing Market Analysis, and the Strategic Plan.

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.

STEH, as the recipient of ESG and local CoC, assists with the authoring of the Consolidated Plan as well as a key stakeholder to consult. Sections of the Consolidated Plan that STEH assists with authoring:

#### The Process:

- 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; and
- Consultation with the Continuum 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.

#### Needs Assessment:

- Estimating 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 and what the most common housing problems are and which populations/household types are more affected than others by these problems;
- 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;
- The needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance;

- The number and type of families in need of housing assistance for families with children and the families of veterans;
- The Nature and Extent of Homelessness by Racial and Ethnic Group; and
- The Nature and Extent of Unsheltered and Sheltered Homelessness.

#### Housing Market Analysis:

- The number of emergency shelter beds, transitional housing beds, and permanent supportive housing beds in facilities and housing targeted to homeless households;
- The mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons;
- Describing 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.

#### Strategic Plan

- Assessment of strengths and gaps in the Institutional Delivery System;
- Availability of services targeted to homeless persons and persons with HIV and mainstream services;
- The strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness;
- Summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs;
- Addressing the emergency and transitional housing needs of homeless persons;
- Discuss 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; and
- Discussion of how to 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.

## 24.2 Annual Update

Once HUD announces the allocations of the entitlement funding, the City has 45 days to submit the Annual Action Plan which outlines to HUD how the funds will be distributed through the established programs listed in the Consolidated Plan. STEH, as the recipient of ESG and local CoC, assists with the authoring of the Annual Action Plans as well as a key stakeholder to consult. STEH assists with the description of the jurisdictions one-year goals and actions for reducing and ending homelessness including:

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

- Addressing the emergency shelter and transitional housing needs of homeless persons;
- 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, and
- 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 Annual Action Plan also includes:

1. Written standards for providing ESG assistance;
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, description of that centralized or coordinated assessment system;
3. The process for making sub-awards and description of how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations);
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; and
5. Description of the performance standards for evaluating ESG.

## 25. Program Reporting and Reviewing Requirements

### 25.1 Recipient

The annual accomplishment report is due to HUD 90 days after the program year. As the City's entitlement funding is on a calendar basis, the Consolidated Annual Performance and Evaluation Report (CAPER) is due March 31<sup>st</sup>. The CAPER is submitted through the IDIS reporting platform. STEH assists with the following narratives in the report:

- Racial and ethnic composition of individuals assisted with ESG;
- Explanation of how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied;
- Evaluation of the jurisdiction's progress in meeting its specific objectives for reducing and ending

homelessness through:

- Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs;
- Addressing the emergency shelter and transitional housing needs of homeless persons;
- Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs; and
- 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.

In concert with the CAPER submission through IDIS, the City and STEH are also required to report annually in the Sage HMIS Reporting Repository (Sage). While the overall accomplishment data is also submitted in IDIS with the CAPER, the Sage data is a very detailed report regarding the demographic information, households served, point-in-time count of households, number of persons engaged, physical and mental health conditions, domestic violence information, disabilities, lengths of stays, exit destinations, information regarding veterans assisted, and homelessness prevention assessments.

## 26. *Reserved* (Program Technical Assistance and Trainings)

STEH provides resources, tools, and support for Program Operators, as appropriate. STES's technical assistance resources include:

- Tools, policy templates, and technical training
- Training and knowledge-building through online courses and webinars
- Responses to basic program, policy and system questions
- In-depth, program assistance and capacity building to improve the design and delivery of programs and services funded by HUD

## 27. Monitoring Requirements

### 27.1 Recipient

The City of Cincinnati is responsible for monitoring Subrecipients to ensure compliance with all regulations and requirements governing their administrative, financial and programmatic operations. This includes assuring that performance goals are achieved within the scheduled time frame, budget and when necessary, taking appropriate actions when performance problems arise. Monitoring will occur through desk reviews, site visits, review of submitted reports, and ongoing contract supervision.

The City is responsible for conducting desk reviews of each subrecipient agreement with STEH. This may occur with the review of submitted monthly vouchers for reimbursement. A site visit will occur at least annually and will include a 15-day written notification, entrance conference, review and collect supporting documentation, an exit conference, and a follow-up correspondence within 60 days of the exit conference.

### 27.2 Subrecipient

STEH monitors all ESG program operators for compliance through annual monitoring, routine monitoring and follow up monitoring as appropriate. STEH maintains current written monitoring procedures, and records of monitoring results, which are available for review by HUD and/or the grantee upon request.

#### Annual Monitoring

All program operators receiving ESG funding receive an Annual Monitoring each calendar year.

Annual Monitoring may involve the following elements:

- An entrance conference with subrecipient staff to communicate the objectives, scope, and focus of the monitoring
- File review, verification, and documentation of performance data
- Compliance testing of transactions charged to the grant
- Interviews with key program operator staff, subcontractors, partners, and program participants, as necessary
- Physical inspections, if appropriate
- Exit conference with key program operator staff/officials

Following the Annual Monitoring, STEH completes HUD's monitoring exhibits from CPD Monitoring Handbook 6509.2, as applicable. Any questions on the tool that result in a negative response are included in the monitoring letter and are required to be corrected. Program operators are required to submit a corrective action plan within 30 days of the date on the monitoring letter, detailing how the specific issue was resolved, and steps taken to prevent future noncompliance.

#### Routine Monitoring

Routine monitoring procedures are those activities, other than Annual Monitoring, that STEH undertakes throughout the to evaluate program operators' performance. Routine monitoring activities may include:

- Evaluating program operator performance reports
- Evaluating data in HMIS
- Reviewing audited financial statements
- Evaluating interim project cost reports, and requesting data from the program operator for verification
- Reviewing pace of spending
- Reviewing monthly billing documentation
- Reviewing funding applications and materials
- Reviewing written policies and procedures
- Reviewing detailed grant expenditure reports

For routine monitoring, the monitor requests specific information that the program operator needs to submit to STEH, along with a timeframe for submission.

All programs receiving federal funding through STEH will receive some level of routine monitoring on an on-going basis.

#### Follow-up Monitoring

STEH may undertake follow-up monitoring with program operators as a result of audit findings, agency assessed risk, insufficiency of corrective action plan response, or sanctions imposed by the Homeless Clearinghouse.

Examples of follow-up monitoring include:

- Review of agency revised policies
- Targeted review of participant records
- Review of additional financial documentation prior to reimbursement

When conducting follow-up monitoring, STEH provides a written request for the documentation that the program operator must submit along with a timeframe for submission.

## 28. IDIS and Reporting Methodology

The City of Cincinnati is the Integrated Disbursement and Information System (IDIS) administrator. The IDIS system is the platform by HUD tracks performance on entitlement grant programs and also is the line of credit with the grantee. The City utilizes IDIS for reporting and uploading the Consolidated Plan, Annual Action Plans, and Consolidated Annual Performance and Evaluation Reports. Each year the ESG projects are identified with the Annual Action Plan. Each activity is set-up to establish one IDIS activity number per funding year. The activities include: Street Outreach, Shelter, Homeless Prevention, Rapid Re-Housing, Data Collection (HMIS), and Administration. In order to track the 7.5% cap on administration, the ESG administration IDIS activity is set up as a subfund and the total dollar amount eligible under the cap is listed, which prevents the City from exceeding this amount. Requests for reimbursement occur from STEH under each funding agreement monthly. The City requests reimbursement from HUD by every 90 days.

## 29. Grant process and Sage HMIS Reporting

The Consolidated Annual Performance Evaluation Report (CAPER) is the primary mechanism for Emergency Solutions Grants (ESG) Program accomplishment reporting to HUD.

The ESG-CAPER in Sage is due to HUD no later than 90 days after the end of the City of Cincinnati's program year. An overview of the ESG process is as follows:

1. The City of Cincinnati allocates funding to STEH, CoC Lead Agency.
2. In collaboration with the CoC Board, STEH makes funding recommendations for specific ESG use.
3. STEH allocates funding based on approved use and enters into a subaward with Program Operator(s).
4. Program Operator(s) enter data into a single project set up in the HMIS or comparable database system for each project they receive ESG funding to provide corresponding to the instructions in the ESG Program HMIS Manual. For example, if the subrecipient is receiving ESG funds for Emergency Shelter (ES) and Rapid Re-Housing (RRH), the subrecipient would enter data for two projects in HMIS: one for ES and one for RRH.
5. On a regular basis, as required by the Hamilton County and STEH subaward, Program Operators will provide financial information on expenditures to the City of Cincinnati. The City of Cincinnati will draw funds from IDIS not less than once during each quarter of the program year. At the end of the year all financial information will be reported in Sage.
6. Approaching the end of the program year, STEH will set billing and reporting deadlines with the Program Operator(s). All HMIS data, match data, and financial expenditure data must be provided at this time.
7. In coordination with STEH, Hamilton County will complete the report in Sage identifying all projects with funds expended during the program year.
8. Sage will send an email to STEH for each project funded. The email will contain a link for the subrecipient to use to upload their HMIS ESG CAPER report in CSV format to Sage. Once uploaded the CSV file will be attached to the Hamilton County's CAPER report.
9. The City of Cincinnati completes the full CAPER submission in Sage by:
  - a. Completing all forms.
  - b. Reviewing the CSV uploads from each submission ensuring the data transmitted is consistent with the number of persons expected to be served with ESG for each project, and
  - c. Having the City's staff with Data Entry and Account Admin user level access sign and submit the CAPER to HUD.



## 30. Use of Waivers

During the COVID-19 pandemic, the City of Cincinnati has adopted applicable waivers and additional flexibility for the ESG Program. Upon notification of flexibilities by HUD, the City of Cincinnati notified HUD of the intent for use. STEH was informed in writing of the allowance of use of flexibilities. STEH notifies Program Operators of allowability and conducted several virtual trainings on the requirements included in the Notices. Policy templates were provided to Program Operators to update policies quickly and easily in compliance with HUD requirements. On behalf of the City of Cincinnati, STEH monitors Program Operators for required policies when waivers and flexibilities were implemented.

Use of waivers approved by the City of Cincinnati:

December 30, 2021: *Availability of Additional Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19.*

Date on which the grantee anticipates first use of the waiver flexibility:

January 5, 2022

Additional waiver flexibilities the City of Cincinnati and its subrecipients will use:

9. ESG: Homeless Definition – Temporary Stays in Institutions of 90 Days or Less

10. ESG: Assisting Program Participants with Subleases

*Justification:* Our CoC's PIT count for 2021 showed that there were 1,016 people living without stable housing in Cincinnati/Hamilton County. With the housing need continuing to outpace the supply, even for those with access to stable housing, it is increasingly difficult to assist our homeless population. Use of this waiver to allow participants to enter into a sublease with the primary leaseholder would increase the limited supply of available housing, enabling program operators to quickly house participants who might otherwise end up on the street or in congregate shelter, further exacerbating public health risk and risk to their own health relating to COVID-19.

11. ESG: Helping Current Program Participants Maintain Housing – Housing Relocation and Stabilization Services

*Justification:* On December 31, 2021, the City of Cincinnati Health Department recorded 693 new COVID-19 cases, up from 229 daily cases just one week prior, and cases continued to rise in the following days. Use of the waiver to allow more than 24 months of services for participants to participants who reach the 24-month limit between two days after notification to HUD and March 31<sup>st</sup>, 2022, and who will not be able to obtain or maintain housing without continued services would prevent these participants from entering congregate shelters where they would be at increased risk of COVID-19 infection.

12. ESG: Helping Current Program Participants Maintain Housing – Rental Assistance

*Justification:* On December 31, 2021, the City of Cincinnati Health Department recorded 693 new COVID-19 cases, up from 229 daily cases just one week prior, and cases continued to rise in the following days. Use of the waiver to allow more than 24 months of rental assistance to participants who reach the 24-month limit between two days after notification to HUD and March 31st, 2022, and who will not be able to obtain or maintain housing without continued rental assistance would prevent these participants from entering congregate shelters where they would be at increased risk of COVID-19 infection.

### 13. ESG: Restriction of Rental Assistance to Units with Rent at or Below FMR

*Justification:* The housing market in Cincinnati is incredibly tight. An internet search for 2-bedroom apartments in Cincinnati yielded just 33 units at or below FMR in the entire city. The options became even slimmer in a search for larger units: a 3-bedroom search at FMR yielded just 15 results. Because of the competitive housing market, property owners are able to charge a premium rate and be more selective with applicants. Many owners are unwilling to work with prospective tenants with poor credit, poor or no rental history, and other housing barriers that our participants face, which further reduces the housing options. Use of the waiver to allow ESG funds to participants with leases exceeding FMR (but meeting rent reasonableness) that are executed between two days after notification to HUD and March 31st, 2022 would improve program operators' chances of quickly moving people into housing, thereby reducing their risk of COVID-19 infection.

*March 31, 2021: Availability of Additional Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19.*

Date on which the grantee anticipates first use of the waiver flexibility:

April 9, 2021

Additional waiver flexibilities City of Cincinnati and its subrecipients will use:

### 11. ESG: Homeless Definition – Temporary Stays in Institution of 90 Days or Less

*May 22, 2020: Availability of Additional Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19.*

Date on which the grantee anticipates first use of the waiver flexibility:

May 29, 2020

Additional waiver flexibilities City of Cincinnati and its subrecipients will use:

### 1. ESG Program – Housing Stability Case Management

March 31, 2020: *Availability of Additional Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19.*

Date on which the grantee anticipates first use of the waiver flexibility:

April 4, 2020

Waiver flexibilities City of Cincinnati and its subrecipients will use:

- Consolidated Planning Requirements – HOME, CDBG, ESG, and HOPWA Programs – Citizen Participation Public Comment Period for Consolidated Plan Amendment

City of Cincinnati will use at least 5 days for comment period

- Consolidated Planning Requirements – HOME, CDBG, ESG, and HOPWA Programs – Citizen Participation Reasonable Notice and Opportunity to Comment
- ESG Program – HMIS Lead Activities
- ESG Program – Re-evaluations for Homelessness Prevention Assistance
- ESG Program – Housing Stability Case Management
- ESG Program – Restriction of Rental Assistance to Units with Rent at or Below FMR

## 31. Revisions and Additions

February 11, 2022. Approving City Official: Aisha Tzillah

- Addition: Paragraph 2, Section 1. Purpose and Use

March 16, 2022. Approving City Official: Aisha Tzillah

- Inserted previously-adopted justifications for use of waivers #10-13 authorized in December 30, 2021 memorandum, Section 30. Use of Waivers

May 18, 2022. Approving City Official: Aisha Tzillah

- Section 3. Definitions: changed “landlord” to “property owner.”
- Section 14.1. Determining Appropriate Unit Size: Removed dated language in example of who might share a bed.
- Section 14.1. Habitability and HQS: Clarified language; Removed paragraph regarding the Sample Housing Quality Standards Policy requirement; Added sentence regarding inspection documentation requirements and clarified language.
- Section 14.1. Complaint Inspections Requested by the Property Owner or Participant: Clarified language; added contact information for Cincinnati Department of Buildings & Inspections, Cincinnati Health Department, and Cincinnati Citizen Service Request; Clarified inspection requirements.
- Section 14.1. Extensions: Clarified language; Added requirement.
- Section 14.1. Re-inspection: Clarified language; Clarified requirement.
- Section 14.1. Lead-based Paint Requirements: Added lead-based paint requirements and clarified language.
- Section 14.1. Calculating the Amount of Assistance: Clarified language; Clarified categorization requirements; Added definitions.

- Section 14.1. Initial Subsidies (Calendar Months 1-3): Clarified requirements.
- Section 14.1. Subsequent Subsidies (Calendar Months 4-24): Changed "4-24" to "4+"; Edited formatting; Clarified language.
- Section 14.1. Added footnotes 4 and 5.
- Section 14.1. Housing Assessment and Case Plan: Removed section.
- Section 14.1. Financial assistance costs: Clarified categorization requirements; Edited formatting; clarified language.
- Section 14.1. Services costs: Edited formatting; Added requirements and recommendations.
- Section 14.2. Non Discrimination: Added clarifying language to heading.
- Section 30. Use of Waivers: Edited formatting.

## Appendices

Appendix A: Emergency Transfer Plan

Appendix B: Sample Habitability-HQS Policy

Appendix C: Rent Reasonableness Checklist

Appendix D: Income Inclusions and Exclusions



## **Emergency Shelter Program, Operations, and Facility Accreditation Standards**

### **Background-**

The Emergency Shelter Program, Operations, and Facility Accreditation Standards (a.k.a. Shelter Standards) are intended to serve as the standards for Emergency Shelters receiving public funding in the City of Cincinnati and Hamilton County, Ohio. These standards apply to facilities which are receiving public funding as an emergency shelter, but not to agencies funded as transitional or permanent housing. Emergency shelter facilities must agree to work toward and then adhere to these standards for receipt of public funding. Shelter facilities must complete the following Shelter Standards process at least every year.

The previous "Minimum Standards" for emergency shelters were updated in 2009 by the Greater Cincinnati Coalition for the Homeless (GCCCH) and Strategies to End Homelessness, Inc. (STEHI) by mandate of Cincinnati City Council, and as a part of the Homeless to Homes planning process. Recommendations for these updated standards were drawn and adapted from the Homeless to Homes plan itself, as set forward by the community process which created it. Some additional edits were made by City Council. Due to these facts, emergency shelters will have to be in alignment with the Homeless to Homes Plan and these standards in order to receive either HUD (i.e. ESG, HOPWA, CDBG, and Supportive Housing Program) funds allocated to the City of Cincinnati, or other City of Cincinnati funding.

The monitoring of these standards will be carried out by Strategies to End Homelessness, Inc.

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### **Process-**

The Shelter Standards process has four steps:

- I. The requested policies and procedures are assembled by the facility into a Shelter Standards Binder, to be appropriately updated and then provided to and reviewed by Strategies to End Homelessness, Inc.
- II. A Shelter Standards Report is written by the emergency shelter facility describing its efforts to meet the Shelter Standards requirements, and outlining steps being taken to achieve any requirement outlined in the standards which the facility is not yet able to meet. This report will be provided to Strategies to End Homelessness, Inc. with the Shelter Standards Binder in advance of the site visit
- III. A Shelter Standards Site Visit is conducted by Strategies to End Homelessness, the Cincinnati Health Department, and the Cincinnati Department of Community Development, and the facility inspected.
- IV. A Shelter Standards Evaluation Letter will be provided to the facility outlining what, if any, steps or improvements need to be taken prior to the agency's next Shelter Standards review for funding to continue.

**I. Shelter Standards Binder:**

The following documents are to be included in the binder:

**A. Shelter Administration Policies and Procedures**

- 501(c)3 documentation
- Mission Statement
- A Facility Description including:
  - i. Description of the population to be served
  - ii. Description of the services to be provided
  - iii. Number of employees
  - iv. Hours of operation
  - v. Number of clients to be served
- A Management Plan including:
  - i. Goal statement for the population
  - ii. Description of the operation and management of the facility
  - iii. Description of current collaborations and efforts to collaborate with other providers
  - iv. Behavioral standards for residents
  - v. Security plan for the facility, which should include monitoring any police runs/911 calls to the facility and related to its residents
  - vi. Policy prohibiting drug and alcohol use within the facility, including agency rules regarding when a client will be barred from the facility for violating these policies
  - vii. Commitment to work with police to measure 911 calls resulting from residents
  - viii. Policy on length of stay, consistent with the mission of providing temporary emergency shelter
- Program description(s)
- Non-discrimination policy
  - i. Policy of non-discrimination in the provision of client care based on the following: age, race, color, religion, sex, sexual orientation or gender identity and expression, marital status, geographical, national or ethnic origin, HIV status, disability, or veteran status (with consideration given to agency mission of organization, etc. )
- Include a policy of gender-specific programming matching the mission statement of the organization for the placement of clients within the shelter/agency based on self-reported gender identification. If not yet complete, what steps are being taken to meet this requirement?
- Sexual harassment policy pertaining to both staff and clients
- Policy compliant with Americans with Disabilities Act
- Tuberculosis policy, including the testing of staff and residents
- HIV/AIDS policy
- List of agency board members, including board participation by at least one current or formerly homeless person
- Conflict of interest policy for board and staff
- Current and relative ethics policy for personnel
- Policy pertaining to authorized/unauthorized search of clients' property by staff
- Staff emergency evacuation training
- Volunteer policy, including selection, training, and definition of tasks
- Hiring policy in compliance with EEO guidelines

- Hiring policy for new staff members, including any screening processes used by agency

**B. Grievance Procedures**

- Agency/Client grievance procedure, which includes:
  - i. Details regarding how and when each client is given a copy of the grievance procedure with a verbal explanation
  - ii. Describes the handling of grievances while in the program, and if client feels she/he has been wrongly terminated
  - iii. Policy of client readmission after discharge and later return to shelter

**C. Fiscal Management**

- Quarterly financial reports as reported to Board of Directors
- Copy of last annual Audit/financial review, agency has accounting system capable of audit/financial review
- Policy regarding management of client funds

**D. Client Confidentiality**

- Policy restricting computer access to client records to relative authorized staff
- HMIS confidentiality policy for emergency shelter

**E. Health and Safety**

- Housekeeping policy pertaining to inside the facility as well as the outside property
- Agency maintenance plan for inside the facility as well as the outside property
- Fire Safety:
  - i. Evacuation plan for ambulatory and non-ambulatory residents
  - ii. Fire detection system in compliance with fire code
  - iii. Adequate fire exits
  - iv. Adequate emergency lighting
- Documentation of at least quarterly fire drills
- Last annual fire inspection
- Staff certification(s) in emergency first aid procedures for at least one person on duty for each shift
- Policy regarding communicable illness

**F. Medical Care**

- Policy regarding the possession and use of controlled substances
- Policy regarding clients' use of prescription medications
- Policy regarding clients' use of over-the-counter medications
- Policy regarding clients' access to medical care

**G. Public Standards**

- Litter Control Policy that includes maintenance of facility-owned trash receptacles, litter pickups on facility-owned property and adjacent right-of-way, including sidewalks, gutters, tree lawns, the placing of trash receptacles, for client use, on facility grounds and in surrounding areas used by clients, and efforts to inform clients of the importance of not littering
- Safety and Security plans for clients, employees and physical facility both inside the facility and outside on facility-owned property

- i. Agency provides new clients with information about the surrounding area (including services, neighbors, businesses, parks, local laws relative to occupancy in the area, contact information for local liaison police officers, address of facility and other pertinent facilities, etc.)
- Policies regarding loitering and noise control on facility-owned property
- Policy discouraging the use of drugs and alcohol by residents, and description of how residents are discouraged from such use by shelter.
- Policy discouraging panhandling by residents, which includes:
  - i. Description of how residents are discouraged from panhandling by the shelter
  - ii. Description on how the shelter facility addresses shelter residents known to be panhandling in the community
  - iii. Outlines clear and consistent consequences to be enforced if a resident is known to be panhandling
  - iv. Describes how residents are discouraged from the purchase of drugs or alcohol with panhandling funds
- Description of restroom availability
- Communication plan that includes a point of access for the local community to be able to communicate with the Organization and a policy for how grievances from the local community will be addressed

STEHL will not be monitoring this portion of the Shelter Standards, until provided with guidance on how to do so from the Cincinnati City Solicitor and/or City Manager

#### H. Food Safety

- Policy providing adequate provisions for meeting the nutritional needs of infants, children and/or pregnant women.
- Policy providing adequate provisions for meeting the nutritional needs of clients with specific medical conditions (HIV, Diabetes, etc.)
- Documentation that facility has met the Health Departments standards during previous inspections

#### I. Services and Case Management

- Intake procedure
- Criteria for admission
  - i. Agency has policy requiring that house rules, regulations and disciplinary procedures pertaining to activities inside the facility as well as on the outside facility-owned property are read to and signed by all clients upon entry
- Policy for referral if client cannot be served
- Client termination policy
- Current and relative client confidentiality policy
- Current organizational chart delineating all paid and unpaid positions
- Current and relative job descriptions for all paid and unpaid positions
- Case Manager job descriptions
  - i. Case managers required to focus their time and energy on engagement, program enrollment, needed referrals and connections (client-network building), fostering stabilization and facilitating movement into housing and needed services



## II. The Shelter Standards Report:

The following items are to be addressed in the report-

- A. Outcomes:
- Outcomes that have been achieved with population served:
    - i. % of shelter residents who exit to transitional or permanent housing:  
Last Inspection: \_\_\_\_; This Inspection: \_\_\_\_
    - ii. % of clients whose exit income was greater than their intake income:  
Last Inspection: \_\_\_\_; This Inspection: \_\_\_\_
    - iii. Was HMIS used to generate outcome data? If not, what method was used to generate outcome data?
  - Outcome goals for population served related to:
    - i. % of shelter residents who exit to transitional or permanent housing
    - ii. % of clients whose exit income was greater than their intake income
    - iii. Was HMIS used to generate outcome data? If not, what method was used to generate outcome data?
  - Does the agency have clearly defined and implemented intake and exit method to facilitate outcome measurements?
  - Identification of barriers to improved outcomes and efforts to improve
- B. Are spaces (in particular any spaces which have been renovated) designed to give people the smallest group sleeping rooms feasible, rather than large, dormitory-style sleeping rooms.
- C. Number of people sleeping in facility: \_\_\_\_.
- Is there enough space for this number of people? If not, how is the agency working to improve? Is the agency working to lower the number of people in group sleeping areas (Give examples of efforts)?
- D. Is the shelter readily accessible either directly or through public transportation to community amenities that the participant population normally requires, including grocery stores and recreation, medical services, training, mental health or substance abuse disorder treatment, and mainstream benefit/resource facilities and other programs needed to meet the goals of this program? (Provide any appropriate written documentation)
- E. Is everyone entering the shelter assigned to an individual case manager or case management team? If no, explain how improvement is being made.
- F. Do all residents receive the following as a part of case management services? If no, describe how improvement is being made.
1. Basic service: a bed, food and toiletries will be provided for each individual
  2. An assessment of the individual's situation initiated within 48 hours of admission into the shelter. If this is not happening, what are the barriers to this occurring?
  3. Agency is working to lower average client-time spent at agency before assessment is completed. Average time at last inspection: \_\_\_\_ Current average time: \_\_\_\_

4. At a minimum the assessment must include (Provide an anonymous example):
  - i. Current situation and reason for homelessness
  - ii. Information about personal/family support
  - iii. A housing history
  - iv. Income/economic situation
  - v. Education/training levels achieved
  - vi. Social service and health history
  - vii. Basic life skills inventory
  - viii. Veteran status, service in the Armed Forces, and eligibility for VA housing and services
  - ix. Special issues review (e.g. mental health, substance abuse, physical/cognitive/sensory disabilities, etc.)
  - x. Any justice system involvement, existing legal conditions (probation, parole, sex offense designation), and appropriate related contact persons (such as a probation officer).
5. Intensive case management will be provided to each individual within the shelter system, which includes-
  - i. Case Management Ratio:
    - a) What is the current number of case managers serving clients within the facility?
    - b) According to data from HMIS or other agency-used database system, what is the average number of residents in emergency shelter beds in the facility per night?
    - c) What is the current case management ratio? ( $a/b = \text{Case Management Ratio}$ )
    - d) If higher than 1:10, what steps are being taken to reduce the agency case management ratio? What was the ratio at last inspection? Can improvements be seen? If no, what is being done to improve this?
  - ii. Development of an individual client-centered case plan that at a minimum must include (Provide an anonymous example with each step included):
    - a) Focus on discharge planning
    - b) Obtainable housing plan (Exit Strategy)
    - c) Removal of or lessening of barriers to housing
    - d) Increasing income and/or accessing benefits that will lessen barriers in the way of the individual's sustainable success at independent living (if independent living is applicable)
    - e) Stabilization and development plan
    - f) All individual case plans will be securely and confidentially stored in HMIS or other proper electronic client-data storage system and a partnership agreement between appropriate shelters will be used to address case planning in recidivist cases
    - g) Discharge plans should be forwarded to the next housing placement and be inclusive of a summary of the elements of the ISP the person has completed, what is in progress and what is left to accomplish.
  - iii. Case managers serve as brokers of services for homeless households by: (display job description with each of these roles cited)
    - a) Focus on discharge into transitional or permanent housing:

- b) Helping homeless household identify and connect to the resources they need to carry out their Case Plan
  - c) Serving as advocates for homeless individuals within the housing, mainstream resource and service delivery systems so that clients can successfully access other systems and programs
  - d) Providing information, referral, and support to access housing and services are provided to meet the individual needs of the client.
  - e) Providing support, information and referral services to clients in need of substance abuse and mental health engagement.
6. How does the facility begin discharge planning upon client entrance into the emergency shelter system? How does this discharge plan include the following-
- i. Exit strategy
  - ii. Removal of or lessening of barriers to housing
  - iii. Increasing income and/or accessing services that will lessen barriers in the way of the individual's success at independent living
  - iv. Discharge plans should be forwarded to the next housing placement (from shelter to transitional housing to permanent supportive housing) and be inclusive of a summary of the elements of the ISP the person has completed, what is in progress and what is left to accomplish.
  - v. An identified appropriate time limit for length of stay before moving to transitional or permanent housing options.

### **III. The Shelter Standards Site Visit:**

The following will be reviewed during the Site Visit.

#### **A. Health and Safety**

- That your facility is clean and in good repair
- Fire Safety:
  - i. Evacuation plan for ambulatory and non-ambulatory residents
  - ii. Fire detection system in compliance with fire code
  - iii. Adequate fire exits
  - iv. Adequate emergency lighting

#### **B. Medical Care**

- A phone available to clients for medical emergency
- Adequate Red Cross compliant first aid equipment is available and easily accessible by staff
- Properly secured medications

#### **C. Clean and Safe**

- Facility-owned trash receptacles have lids that are properly closed to dispel rodents, etc.
- Outside facility-owned property is free of litter and trash that is not in receptacles
- Security plan in use; agency grounds, facility and client activity on-site are monitored to help prevent criminal activity
  - i. Since the last inspection how many times did staff make emergency calls for violent activity?

1. How many such calls since the last inspection?
  2. What is being done to decrease the number of such emergency calls?
- Loitering and Noise Control Program in use on agency-owned property.
  - Restroom availability for residents to use: Are there enough restrooms available for the number of people in the facility?
  - Public point of contact information is posted

**D. General Shelter**

- Grievance procedure is clearly posted where all can see it
- A crib, bed with linens, or mat for each client
- A separate toilet and shower facility for men and women
- Private space to meet with clients
- Laundry facilities for clients
- Any renovated spaces designed to give people the smallest groups sleeping space feasible, rather than large, dormitory-style sleeping rooms.
- Housing must be readily accessible to community amenities that the participant population normally requires, including grocery stores and recreation, medical services, training, mental health or substance abuse disorder treatment, and mainstream benefit/resource facilities.
- House rules, regulations and disciplinary procedures posted in a conspicuous place.
- Provisions for sanitary food storage and preparation

**E. Documentation**

- Maintained records of all residents in facility, including name, age, race, gender, and income level (provide an anonymous example).
- Maintained documentation of clients sheltered, served or referred elsewhere
- Trained personnel to adequately work with clients are on site during all hours that your facility is open to clients
- A written log of incidents and instructions for oncoming personnel (Provide example.)
- Secure computer location(s) at which HMIS or other client-data entry is completed