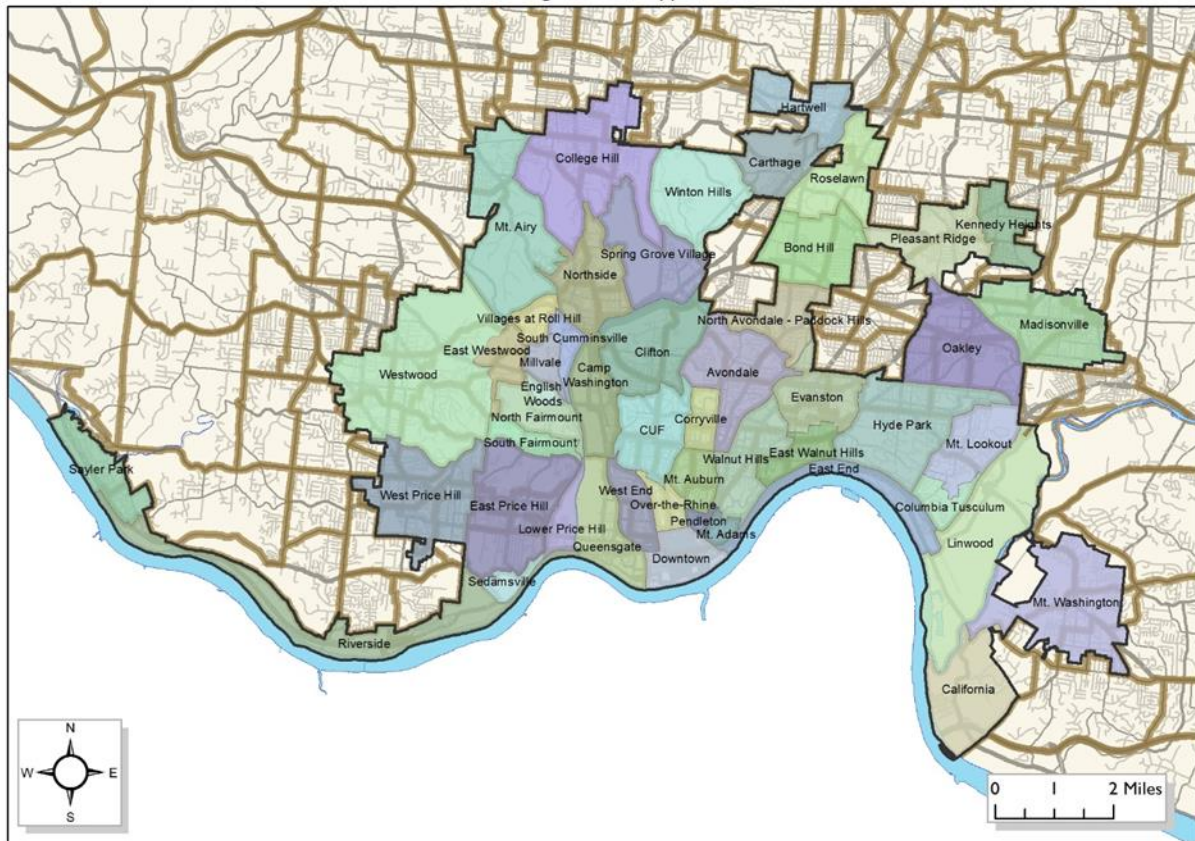


City of Cincinnati 2023 Annual Action Plan

Cincinnati Neighborhoods
Statistical Neighborhood Approximations



Executive Summary

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

1. Introduction

The City of Cincinnati's 2023 Annual Action Plan presents a series of initiatives to be accomplished between January 1, 2023 and December 31, 2023, which corresponds to portions of the City's Fiscal Year 2023 (January 1, 2023 to June 30, 2023) and Fiscal Year 2024 (July 1, 2023 to December 31, 2023). The purpose of the Action Plan is to ensure that all activities undertaken with these federal funds 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 informed by City Council priorities, direct contributions from public forums, engagement meetings, and surveys, and 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

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.

- At the direction of the City, both ESG and HOPWA programs are evaluated by collaborative processes facilitated by the Continuum of Care Lead Agency and United Funding Agency, Strategies to End Homelessness (STEH). An advisory consortium meets to evaluate programs and community needs for each respective Annual Action Plan.
 - ESG Programs:
 - At minimum \$550,000 is set aside annually for emergency shelter operations and related supportive services. The maximum amount, dictated by HUD regulations, is 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.
 - HOPWA 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 (PHP); and
 - Supportive services including case management and nursing care for persons with HIV/AIDS.

The Consolidated Plan priorities factored in the following items: Public survey results, Community Development Advisory Board Input, City departmental staff program feedback, Needs Analysis, Market Analysis, efficiency and effectiveness of programs, leverage of funds, and City administration policy direction.

3. Evaluation of past performance

Accomplishment data for Calendar Year 2022 of the 2020 – 2024 Consolidated Plan’s goals and objectives were reported in the 2022 Consolidated Annual Performance and Evaluation Report (CAPER), which was submitted to HUD on March 31, 2023. Program and project performance was closely monitored, and community needs were assessed at a larger scale, throughout the prior program year. These activities continually inform program design and management improvements, as well as budgetary adjustments and funding decisions, to reflect an ability to timely perform pursuant to HUD requirements.

4. Summary of Citizen Participation Process and consultation process

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 16, 2023, the entitlement program accomplishments during calendar year 2022 were presented to the City’s Community Development Advisory Board (CDAB) and the public. A separate public meeting was held on April 6, 2023 with the CDAB and the public, to further evaluate each program’s performance within the context of 2023 funding allocations and inclusion in the 2023 AAP. Feedback regarding program performance and suggested improvements were noted as public comments. At this meeting, the CDAB provided funding priority recommendations for the established programs for the 2023 AAP.

Following these public engagements, the 2023 recommended budget was distributed and presented to administering departments. The City Manager submitted a Recommended Annual Action Plan Budget to City Council’s Budget and Finance Committee for public comment and deliberation on April 17, 2023, and for final Council approval on April 19, 2023. The City Council approval process includes another opportunity for public input.

5. Summary of public comments

Public feedback has been collected via survey and focus group, public hearings, and during legislative approval processes to identify the top community needs which represented projects established in the 2020 – 2024 Consolidated Plan. Common themes for CDBG and HOME programs included residents' desire for the prioritization of funding to projects within neighborhoods, such as public infrastructure (pedestrian safety, blight abatement, public safety improvements), broad housing supports including public services, housing improvements and development, and for capacity building to foster community-led revitalization and development projects.

The City's advisory board for the Consolidated Plan / Annual Action Plan process, the Community Development Advisory Board (CDAB), held a public meeting on April 6, 2023 to discuss the 2023 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). ESG and HOPWA have separate advisory boards.

The City's recommended CDBG, HOME, ESG, and HOPWA budgets were presented before the City of Cincinnati's Budget and Finance Committee on April 17, 2023. The funding recommendations were based on CDAB and public priorities. Cincinnati Council passed the entitlement ordinances on April 19, 2023.

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 prior programs that were completed or diverted to other City resources, as these programs are no longer addressed by the Consolidated Plan.

7. Summary

City Council made appropriation decisions for the 2023 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 & Responsible Agencies – 91.200(b)

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

Agency Role	Name	Department/Agency
Lead Agency	CINCINNATI	
CDBG Administrator	CINCINNATI	Office of the City Manager
HOPWA Administrator	CINCINNATI	Office of the City Manager
HOME Administrator	CINCINNATI	Office of the City Manager
ESG Administrator	CINCINNATI	Office of the City Manager
HOPWA-C Administrator	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 Buildings and Inspections
- City of Cincinnati Department of Community and Economic Development,
- Cincinnati Recreation Commission,
- Cincinnati Fire Department,
- Cincinnati Police Department,
- Cincinnati Parks, and
- Cincinnati Health Department Childhood Lead Poisoning Prevention Program

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

Consolidated Plan Public Contact Information

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

1. Introduction

The City of Cincinnati worked with a wide array of organizations and existing networks to develop the 2020 – 2024 Consolidated Plan and 2023 Annual Action Plan. Each year, relationships are maintained and fostered with these organizations to establish the Annual Action Plans and to coordinate services.

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

- The local Continuum of Care Lead Agency and Unified Funding Agency, STEH, coordinates the efforts of organizations which provide services to persons experiencing homelessness for ESG programs and coordinates stakeholders 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, Cincinnati/Hamilton County Continuum of Care (CoC) (OH-500) has a CoC Board that oversees all CoC operations and policies; this board’s membership includes representatives from both the City & 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 to administer ESG & HOPWA funds, and to facilitate the work of the community related to homelessness. This work includes:

- Shelter diversion / Homelessness Prevention;
- Permanent Housing Placement;
- Street outreach;
- Emergency shelter;
- Transitional housing;
- STRMU Assistance
- Permanent Housing, including Rapid Re-housing; Permanent Housing Facilities, and Permanent Supportive Housing;
- Services-only programs.

The CoC funding allocation process involves agencies and programs who receive funding from HUD, and also organizations that work with persons experiencing homelessness not receiving HUD funding. The CoC also does the following:

- Assesses capacity & identifies gaps,
- Monitors/evaluates compliance & performance achieved by programs,
- Develops improvements & solutions to systemic issues,
- Implements HUD resource priorities,
- Facilitates allocation of funding to agencies,
- Serves as an inclusive vehicle to promote best practices,
- Researches best practices & organizes community training events,
- Facilitates access to mainstream resources and services for persons experiencing homelessness, and
- Develops tools and policies and procedures to ensure compliance and optimal performance.

CoC infrastructure includes several workgroups, committees, and subcommittees of the CoC Board that bring together service providers, stakeholders, and persons with lived expertise to address particular issues faced by people experiencing homelessness, improve services available to particular sub-populations, and ensure an equitable system while meeting the needs of the most vulnerable.

Among workgroups & subcommittees are:

- Family Housing Partnership, (needs of homeless families),
- Homeless Veterans Workgroup, (needs of homeless and at-risk of homeless veterans),
- Youth Homelessness Workgroup, (needs of homeless youth),
- Coordinated Entry Workgroup, (addressing the most vulnerable in the CoC, including chronically homeless individuals and families through the CoC Coordinated Entry process),
- Permanent Supportive Housing Workgroup prioritizing chronically homeless individuals and families,
- Transitional/Rapid Re-Housing Workgroup (needs of persons experiencing homelessness with individual projects targeting families with children and survivors of domestic violence and persons fleeing domestic violence),
- Racial Equity Workgroup working to improve racial equity throughout the homelessness services system,
- Monitoring Subcommittee to ensure regulatory requirements are adhered to and issues of noncompliance are addressed,
- Data and Scoring Committee focusing on evaluating project performance and community needs, prioritizing projects targeting chronically homeless, veterans, families with children, and youth,
- Persons with Lived Experience (PWLX) Committee, consisting of one STEH facilitator and persons with lived expertise to evaluate and provide consultation on all aspects of the homelessness services system,
- Homeless Outreach Group (needs of the unsheltered population, including case conferencing for specific individuals and system needs for high-barrier populations), and
- Emergency Shelter Workgroup, focusing on optimizing services for 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. The allocation process is based on established performance measures developed in collaboration with the ESG recipients and subrecipients. First, funding is allocated using a bed night calculation for participation. The initial calculation includes the number of bed nights only, as demonstrated by HMIS (Homeless Management Information System) data. Second, that calculation is adjusted based on performance outcomes such as exits to permanent housing. “Drop-in” or “safe” beds are excluded from the adjustment so emergency shelter providers are not penalized for serving high-barrier populations. Then, during the annual Prince of Peace meeting, each applicant 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.

Rapid Rehousing Housing funding is allocated using standard performance evaluation criteria directly from the Emergency Solutions Grant Consolidated Annual Performance Evaluation Report generated by the HMIS. Services providers are required to meet threshold criteria for continued funding such as compliance with regulations, involving persons with lived expertise in the projects, and adequate performance outcomes. Funding recommendations are presented to the City of Cincinnati along with system data, demonstrating a continued need for the projects in the CoC.

HMIS updates required by HUD are made by the 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 HMIS team holds weekly “Office Hours” virtually so users can bring questions to the team and learn from each other. On-demand trainings are made available by the HMIS Lead on TalentMS and a comprehensive review of policies and training is provided annually.

The standard procedure for policy development in our CoC, including for HMIS policies, is that policies are developed by STEH in consultation and collaboration with the appropriate CoC workgroups. Policies are reviewed by all stakeholders within the CoC, including STEH’s Compliance Department, to review for fidelity to HUD’s and other funding requirements. 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 workgroup 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 on STEH’s website. All HMIS users are notified of changes via the HMIS email Newsletter. An annual review of policies is conducted at the CoC’s Governance Meeting.

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

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

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

Table 2 – Agencies, groups, organizations who participated

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

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2019 Fair Housing Assessment	Hamilton County & City of Cincinnati	Goals and recommendations incorporated in the Strategic Plan and reflected in subsequent AAPs
City of Cincinnati 2015-2019 Consolidated Plan & AAPs	City of Cincinnati	Formed the basis of determining appropriate goals and prior resource allocations
Plan Cincinnati (2012)	City of Cincinnati	The Consolidated Plan and each AAP are built on the data, needs analysis, community engagement, and strategies established in this City Comprehensive Plan.
Family Homelessness Services Study (2014)	Strategies to End Homelessness	Goals outlined in this study are incorporated into ESG and HOPWA goals as appropriate.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
City of Cincinnati Resident Survey (2021 & 2022)	City of Cincinnati	These goals established community needs and provided statistically-significant resident feedback regarding effectiveness of City services/programs, and drive prioritization and decision-making of investment and resources

Table 3 – Other local / regional / federal planning efforts

AP-12 Participation – 91.105, 91.200(c)

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

The City of Cincinnati's public participation plan for HUD entitlement grant programs includes: public participation events annually to inform Annual Action plan program and funding priorities, a minimum of two public meetings, including the Community Development Advisory Board (CDAB) meetings, to discuss yearly allocations and performance reports, City website postings of Consolidated Plan, Annual Action Plans, Consolidated Annual Performance and Evaluation Reports, and public and CDAB events. Meeting notices, invitations, and request for comment are distributed to City Administration and City Council offices, community groups, subrecipients, news outlets, and stake holders.

The City solicited public comments throughout development and legislative approvals of the 2023 Annual Action Plan programs and budget. Throughout the year the City has also employed various outreach methods to collect public input and feedback through community surveys, focus groups and neighborhood meetings, budget-prioritization and funding request meetings, among other methods. The City's recommended CDBG, HOME, ESG, and HOPWA budgets were presented and publicly considered during the City of Cincinnati's Budget and Finance Committee on April 17, 2023, with City Council final approval on April 19, 2023. Funding recommendations were based on CDAB priorities, public priorities, City staff recommendations, prior years' resources, and program performance.

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.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response	Summary of comments	Summary of comments not accepted and reasons	URL (If applicable)
1	2021-2022 Resident Survey Random sampling in form of opt-out survey mailed to individuals or follow link	Representative sample of the City populations Income, Race, Gender, geographic zone factors to ensure distribution was representative	1408 Complete Responses +/- 2.6% at 95 level of confidence	Major findings (iii) & Importance Satisfaction Ratings to guide funding allocations (ix)	Comments that did not pertain to AAP programs; Refer to survey results for full analysis	https://www.cincinnati.gov/manager/community-survey/
2	2022 – 2023 Resident surveys (mail, call, online, with translation) with virtual and in-person breakout focus groups	Representative sample of the City populations Income, Race, Gender, geographic zone factors to ensure distribution was representative	1,313 Complete Responses +/-2.7% at 95 UCL	Homelessness prevention Nbhd & community infrastructure and ped safety Vacant/ Blighted buildings and Preventing violent crime / PIVOT Housing support	Comments that did not pertain to AAP programs; Refer to survey results for full analysis	https://www.cincinnati.gov/manager/community-survey/
3	Public Meeting	Non-targeted/broad community	March 16, 2023, April 7, 2023 CDAB reviewed past performance measures and provided funding priorities for the	CDAB rankings were considered with the funding of the programs.	All comments were considered	https://www.cincinnati.gov/community-development/hud-entitlement-grant-submissions/

Sort Order	Mode of Outreach	Target of Outreach	Summary of response	Summary of comments	Summary of comments not accepted and reasons	URL (If applicable)
			established programs.			
4	Departmental meetings	City Staff	Several meetings between 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.	Suggestions to fund completed programs were noted but not incorporated, as those programs are funded through non-federal resources	
5	Public Meeting	City Council	April 17, 2022, April 19, 2022	The City Council voted on the entitlement programs and budget passage.	None	https://cincinnati.legistar.com/Legislation.aspx

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4 (2023)				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	11,259,906	17,983.59	\$17,607,563.72	\$28,885,453.31	0	Acquisition Administration Economic Development Housing Public Improvements Public Services
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$2,890,863	\$190,434.11	\$15,798,225.16	\$18,879,522.27	0	Homebuyer assistance Multifamily rental new construction Multifamily rental rehab Development for ownership Administration

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4 (2023)				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	\$1,000,140	0	\$1,077,888.14	\$2,078,028.14	0	Permanent housing in facilities Permanent housing placement STRMU Short term or transitional housing facilities Supportive services TBRA
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$1,902,035	0	0	\$1,902,035.00	0	Emergency Shelter operations and essential services Rapid re-housing (short- and medium-term rental assistance and Housing Relocation and Stabilization Services)

Table 5 - Expected Resources – Priority Table

The City of Cincinnati's 2023 Entitlement Awards and current program income amounts are listed above. HOME Investment Partnerships Program budgets 2023 allocation with 2022 program income to determine the total project amount available. CDBG budgets with 2023 entitlement allocation and the program income received to date during calendar year 2023 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 calculations for allocation of Administration amounts:

CDBG Administration 20% cap:

CY2023 CDBG Grant Award	\$11,259,906.00
-Administration (20%)	\$2,251,981.20
Maximum Program Amount	\$9,007,924.80
-Less Section 108 debt service	\$265,000.00
CDBG Program Total	\$8,742,924.80

CDBG Public Service 15% cap:

15% of 2023 Entitlement	\$1,688,986.00
Emergency Mortgage Assistance	\$275,000.00
Fair Housing Services	\$175,000.00
Tenant Representation	\$275,000.00
Youth and Young Adult Employment	\$400,000.00
CDBG Public Service Total Allocation	\$1,125,000.00

The CDBG-funded program Hand Up Initiative is a workforce development program carried out by qualified CBDOS, with a focus on residents residing within NRSAs. As such, the allocation to the Hand Up Initiative is not calculated in the Public Service cap, above.

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

CY2023 HOME Grant Award	\$2,890,863.00
+Program Income	\$190,434.11
Total Amount	\$3,081,297.11
-Administration (10%)	\$308,129.71
HOME Program Total	\$2,773,167.40
15% of HOME Allocation for CHDO Development Projects	\$433,629.45
5% of HOME Allocation for CHDO Operating Support	\$144,543.15

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:

CY2023 Grant Award	\$1,000,140.00
Homeless Shelters and Other Homeless Services (60% max of allocation)	\$600,084.00
ESG Administration (7.5% max of allocation)	\$75,010.50

HOPWA 3% Administration Cap:

CY2023 Grant Award	\$1,902,035.00
HOPWA Administration (3% max of allocation)	\$7,061.05

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

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

CDBG funds are used to leverage other public and private funds. The programs which leverage funds are typically: Strategic Housing Initiatives Program; Operating Support for Community Development Corporations (CDCs); Small Business Services; Commercial and Industrial Redevelopment; Historic Stabilization of Structures; Findlay Market Operating Support; and Vacant Lot Reutilization.

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 up 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 seek to maximize the use of publicly owned land, which is most frequently accomplished with projects associated with infrastructure and land (re)development such as Strategic Housing Initiatives Program, Commercial & Industrial Program, and Vacant Lot Reutilization Program. The City has compiled an inventory on the City owned parcels and properties. The available properties are posted on the City’s website, www.choosecincy.com, with an interactive map and property descriptions. As indicated in earlier sections, the City also partners with the local Landbank and Port authority to undertake certain development activities including, but not limited to: acquisition, foreclosure, demolition, brownfield, stabilization, and capacity building with CDCs and CHDOs. Redevelopment projects are generally selected through internally-administered competitive processes (i.e. Notice Of Funding Availability application) and upon the completion of court-related diligence milestones/activities that permit the City and its agency partners to intervene.

Discussion

Prior to establishing the Landbank, the City of Cincinnati operated a program titled Cincinnati Land Reutilization Program (CLRP) to address non-productive publicly owned land or property, some parcels of which the City still controls and may be eligible for federally funded redevelopment. The purpose of the Landbank, as was the case with CLRP, is to return 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.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Goal Supported	Need Addressed	Geographic Area	2023 Funding	Annual Metric / Goal Indicator
Affordable Housing	Affordable Housing	City-wide	CDBG*: \$3,505,000.00 HOME*: \$3,081,297.11	1,193 Units Addressed - Rental units constructed - Rental units rehabilitated - Homeowner housing added - Homeowner housing rehabilitated - Direct financial assistance to homeowners 2 Businesses (CHDO) Assisted
Public Services	Non-Housing Community Development	City-wide, NRSAs	CDBG: \$1,903,000.00	2,350 Persons Assisted - Public service activities other than housing benefit
Economic Development	Non-Housing Community Development	City-wide	CDBG: \$1,600,000.00	2 Acres Remediated 9 Businesses Assisted
Neighborhood Stabilization	Non-Housing Community Development	City-wide	CDBG: \$1,735,000.00	20,378 units addressed - Violations / Blight abated through interventions (acquisition, stabilization, demolition)
Homelessness Prevention	Homeless	City-wide	ESG: \$1,000,140.00	4,060 Persons Assisted
Special Needs	Non-Homeless Special Need	EMSA	HOPWA: \$1,902,035.00	175 Households Assisted

*Note: * Includes 2023 Allocation plus Program Income*

Table 6 – Goals Summary

Goal Descriptions

Each program is identified with the associated Goal, Priority Need, and anticipated outputs, in the following table.

Goal (Priority Need)	Program	2023 Allocation	Expected 5-Yr Strategic Plan Outputs	Expected Program Year 2023	Unit of Measure
Affordable Housing (Affordable Housing)	<u>ADDI</u> American Dream Downpayment Initiative	HOME \$100,000	100 units	20	Direct financial assistance, Household assisted
	CHDO Development Projects	HOME \$433,629.45	40 units	8	Rental units constructed
	CHDO Operating Support	HOME \$144,543.15	10 businesses (CHDOs)	2	Businesses (CHDO) assisted
	Family Rehousing Assistance	CDBG \$230,000	100 units	20	Direct financial assistance, Household assisted
	<u>HARBOR</u> Homeowner Assistance Repairs, Building Order Remission	CDBG \$725,000	30 units	15	Homeowner housing rehabilitated
	Housing Repair Services	CDBG \$2,125,000	5,500 units	1,100	Housing units rehabilitated
Public Services (Non-Housing Community Development)	<u>SHIP</u> Strategic Housing Initiatives Program	CDBG \$425,000 HOME \$2,094,994.80	50 units 100 units	10 20	Housing units rehabilitated & new units constructed
	Emergency Mortgage Assistance & Tenant Representation	CDBG \$275,000 \$275,000	500 persons 1,000 persons	100 250	Persons assisted
	Fair Housing Services	CDBG \$175,000	5,000 persons	1,000	Persons assisted
	Hand Up Initiative	CDBG \$778,000	2,500 persons	500	Persons assisted
Economic Development (Non-Housing Community Development)	Youth and Young Adult Employment	CDBG \$400,000	2,500 persons	500	Persons assisted
	Commercial and Industrial Redevelopment	CDBG \$350,000	10 acres	2	Acres remediated
	Findlay Market Operating Support	CDBG \$50,000	5 businesses	1	Businesses assisted
Neighborhood	Operating Support - CDCs	CDBG \$1,200,000	40 businesses (CDCs)	8	Businesses (CDC) assisted
	Concentrated Code Enforcement	CDBG \$600,000	100,000 buildings	20,000	Housing code enforcement

Stabilization (Non-Housing Community Development)	Hazard Abatement & Stabilization of Structures	CDBG \$1,000,000	1,250 buildings 5 buildings	250 1	Buildings demolished & rehabilitated
	Lead Hazard Testing Program	CDBG \$100,000	600 units	120	Housing code enforcement
	Vacant Lot Reutilization	CDBG \$35,000	10 projects	2	Other
Homelessness Prevention	Rapid Rehousing	ESG \$325,045.50	200 persons	60	Households assisted
	Shelter	ESG \$600,084	20,000 persons	4,000	Persons assisted
	Prevention	ESG \$0	100 persons	20	N/A
	Administration	ESG \$75,010.50			Administration
Special Needs (Non-Homeless)	Permanent Housing Placement	HOPWA \$1,844,973.95	75 households	8	Household housing unit
	Supportive Services		40 households	8	Household housing unit
	STRMU		350 households	64	Household housing unit
	TBRA		400 households	79	Household housing unit
	Housing Operation		120 households	24	Household housing unit
	Administration	HOPWA \$57,061.05			Administration

Table 7 – Goals Summary

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 were funded in the prior year that did not receive an allocation for calendar year 2023, may have prior year resources available in order to address the established goals during the program year. Funds reallocated to these projects will be considered a minor amendment, with the reallocation to be approved through city council action. These four projects include Blueprint for Success; Compliance Assistance Repairs for the Elderly (CARE); Small Business Services; and Neighborhood Business District Improvement Program.

Projects

Projects planned for the 2023 program year are described on the following pages, in Table 8.

Goal (Priority Need)	Program Name	Program Description
Affordable Housing (Affordable Housing)	<p align="center"><u>ADDI</u> American Dream Downpayment Initiative</p>	<p>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.</p>
	<p align="center">CHDO Development Projects</p>	<p>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.</p>
	<p align="center">CHDO Operating Support</p>	<p>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.</p>
	<p align="center">Family Rehousing Assistance</p>	<p>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.</p>
	<p align="center"><u>HARBOR</u> Homeowner Assistance Repairs, Building Order Remission</p>	<p>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, or which have experienced housing instability due to natural-disasters.</p>
	<p align="center">Housing Repair Services</p>	<p>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.</p>

	<p style="text-align: center;"><u>SHIP</u> Strategic Housing Initiatives Program</p>	<p>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.</p>
<p>Public Services (Non-Housing Community Development)</p>	<p>Emergency Mortgage Assistance & Tenant Representation</p>	<p>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. 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.</p>
	<p>Fair Housing Services</p>	<p>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.</p>

	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.
	Youth and Young Adult Employment	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.
Economic Development (Non-Housing Community Development)	Commercial and Industrial Redevelopment	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.
	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.
	Operating Support - 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.

Neighborhood Stabilization (Non-Housing Community Development)	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.
	Hazard Abatement & Stabilization of Structures	The mission of the Hazard Abatement Program is to preserve public health, safety, and welfare through acquisition, 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. Stabilization of Structures abates public nuisance conditions and stabilizes properties, including historic buildings. This program is designed to maintain the public health, safety, and welfare while at the same time preserving the structures for potential future rehabilitation.
	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.
	Vacant Lot Reutilization	The Vacant Lot Reutilization program funds the reuse of vacant, blighted lots and properties integral to public health and safety in eligible census tracts into gardens, farms, parks, neighborhood facilities, and/or recreational facilities.
Homelessness Prevention	Rapid Rehousing	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).
	Shelter	
	Prevention	
	Administration	
Special Needs (Non-Homeless)	Permanent Housing Placement	HOPWA funds will provide housing assistance through Short-Term Rent, Mortgage, and Utility Assistance (STRMU), Tenant Based Rental

	Supportive Services	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.
	STRMU	
	TBRA	
	Housing Operation	
	Administration	

Table 8 - Project Information (AP-38 Project Summary)

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.

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, which concluded in 2022. Upon completion of that planning process, CMHA will apply for a HUD Choice Neighborhoods Implementation Grant in order to implement the transformation plan to redevelop the West End neighborhood. The project will be a partnership between CMHA, local non-profit

community development corporations, and the City of Cincinnati. The City is further supporting capacity-building and project development with local CDCs through partnerships with local agencies (the Port and Landbank) and CDC Associations, Homebase. This enhanced support is directly responsive to public feedback for greater resource delivery directly to and throughout neighborhoods. Additional resources were also directed to household supports in various programs, including increases to Housing Repair Services and HARBOR. These programs are experiencing increased demand, as well as increases to program costs due to labor and supply chain pressures. 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

Target Area	Percentage of Funds
City-wide	75
NRSA	25

Table 9 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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 recommendations of 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 (ESG)	60
Non-Homeless and Special Needs (HOPWA)	175
Special-Needs	0
Total	235

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance (ESG & HOPWA)	139
Rental Assistance (CDBG)	20
The Production of New Units (HOME)	20
Rehab of Existing Units (CDBG)	1,125
Acquisition of Existing Units	0
Total	1,304

Table 11 - 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 4,674 public housing units with a budget of approximately \$137 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

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;
- Identify resources that will allow family shelter to be delivered in a more efficient way, in few locations, so that resources can be focused on services to homeless families, rather than such resources being exhausted moving families and staff between numerous separate shelter locations; and
- Develop and implement a plan for offering seasonal overflow low-barrier shelter capacity for families experiencing homelessness, allowing the shelter system to expand to meet the needs of homeless families at times of peak demand, including summer.

Improve the availability of affordable housing:

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

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

In 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. Data from 2022 is still being finalized; however, similar outcomes are projected for 2022. 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 2022, 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

Data from 2022 is still being finalized. However, similar results are anticipated in 2022 as in 2021. In 2021, the CoC and its partners provided emergency shelter to 6062 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 three 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 2020/21/23, 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 2021/22/23, 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

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 on taking steps 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.

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 on taking steps 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)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	64
Tenant-based rental assistance	79
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	24
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	167*
<i>Note: * Figure does not include PHP</i>	

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

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

Cincinnati’s movement toward creating more connected communities has had a long history, and several the relevant concepts are woven their into the goals and strategies of the City’s Comprehensive Plan. These include the following:

- "Provide a full spectrum of housing options, improve quality and affordability"
- "Offer housing options of varied sizes and types for residents at all stage of life"
- "Expand options for non-automotive transit"
- "Offer a transportation system that emphasizes public transit"
- "Expand connectivity and facilities for pedestrians, bicyclists, transit users"
- "Become more walkable"
- "Increase mixed-use, compact walkable development throughout our neighborhood centers and along transit corridors"
- "Target investment to our Neighborhood Centers"
- "Evenly distribute housing that is affordable throughout the City"
- Support and stabilize our neighborhoods

In January 2022, the City began engaging in a collaborative review of City housing incentives and zoning policies, which led to the Housing Summit, with nearly 200 people in attendance. At the Housing Summit, the idea of “Connected Communities” became a recurring theme, and has grown to become the identifier for this process toward achieving the goal of the namesake. “Connected Communities” is the name given to a series of potential policy changes, and the process involved in crafting those changes, related to land-use that will help Cincinnati grow into a more accessible, people-focused, diverse, healthy, and connected community for all.

Focus areas are as follows:

- **Middle Housing:** The expansion of the different typologies of permissible residential housing, including duplexes, triplexes, row and townhomes, and cottage courts, in certain zoning districts within the zoning code.
- **Reduced Regulatory Barriers:** The modification of existing building regulations, such as height, setback, minimum lot size, floor-area-ratio, and density, to allow more and easier housing production.
- **Parking:** The modification of parking regulations to allow for easier housing production.
- **Encouraging Affordable Development:** Providing a regulatory incentive to projects proposing affordable housing by providing greater flexibility or relaxation of current building regulations such as height, setback, minimum lot size, floor-area-ratio, and density.
- **Human-Scale Development Regulations:** Additional policies and regulations to better create more pedestrian, active, safe, and connected communities.
- **Process Improvements:** Changes, improvements, and accessories to the current regulatory

process in order to reduce redundancy, increase efficiency, expand accessibility, and provide clear expectations and guidelines to reduce uncertainty for residents and developers.

The ultimate goal of Connected Communities is to craft legislation related to land use and modifications to our zoning code that will foster greater development, density where most appropriate, pedestrian and human-centered design, increased affordable housing, and strengthened neighborhood business districts.

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

The lack of permanent housing, funding to provide adequate services to move persons out of homelessness, and adequate funding for preventing homelessness remain obstacles to meeting the needs of the underserved. Knowing that a shorter-term housing subsidy will work for most people in a housing crisis, the CoC is working to increase Rapid Re-Housing in the community. More Rapid Re-Housing will allow more people to move out of homelessness quickly and assist more people with finding stable housing. The CoC is implementing a pilot Progressive-engagement Rapid Re-Housing project to explore transitioning capacity from permanent supportive housing to Rapid Re-Housing to serve a greater number of persons with housing needs.

Actions planned to foster and maintain affordable housing

The City will accomplish affordable housing goals and objectives through housing projects designed to increase housing supply, preserve affordable housing units, maintain housing stability for renters and homeowners, and increase rental and owner opportunities through eviction prevention, tenant representation, code violation, and downpayment efforts. Housing-related programs and support receive the largest share of local entitlement allocations. Programs generally include: Emergency Mortgage Assistance, Fair Housing Services, Tenant Representation, American Dream Downpayment Assistance, Community Housing Development Organizations Development Projects, Family Rehousing Assistance, Homeowner Assistance Repairs and Building Order Relief, Strategic Housing Initiatives Program, and the Housing Repair Services Program.

Actions planned to reduce lead-based paint hazards

The Department of Community and Economic Development has integrated HUD's lead-based paint regulations and guidelines into its housing programs requiring risk assessments and lead hazard reduction work on rehabilitation projects completed with federal assistance on residential structures built before 1978. From 2015 through 2020, 24,004 residential units built before 1978 were completed with CDBG and HOME funded renovation activities, as reported in the PR – 89 Lead Based Paint Report. 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.

The Office of the City Manager in partnership with Department of Community and Economic Development

and Cincinnati Health Department Childhood Lead Poisoning Prevention Program (CHD CLPPP), are administering two HUD Office of Healthy Homes and Lead Hazard Control grant program. These funds are offered on a competitive basis. The award is \$3.4 million for 3 years to address lead-based paint hazards in 225 privately owned eligible units, with a focus on preventing childhood lead poisoning. The grant was completed successfully in 2022. An additional \$3.5 million grant was awarded to the City for the same purposes, with 3 ½ years to complete another 200 units. The funds are also spent on contractor training and community outreach efforts. The City has received and administered five of these HUD Lead Hazard Control grant programs, abating lead hazards in approximately 1,600 units to date.

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.

All housing inspectors for ESG and CoC housing are certified in lead-based paint inspections and housing is inspected for lead-based paint hazards initially and at least annually in housing projects, as applicable.

Actions planned to reduce the number of poverty-level families

The City of Cincinnati primarily focused on programs that promote business development and provide employment training in its efforts to reduce the number of poverty level families. The Consolidated Plan included several goals to address community development needs and reduce the number of poverty level households: Affordable Housing, Homelessness Prevention, Economic Development, Neighborhood Stabilization, Public Services, and Special Needs.

The City of Cincinnati has one of the highest poverty rates in the United States, with 24.7% of persons below the poverty level during 2022. In order to reduce poverty throughout the jurisdiction, the City has enacted strategies including:

- Economic development programs specifically reducing poverty include workforce development investments through job training programs and small business and entrepreneur lending and technical assistance programs;
- The City provides CDBG funds for operating support for Community Development Corporations (CDCs) operating in 19 of the 52 neighborhoods throughout the City;
- CDCs assist with poverty reduction in the community by developing housing, revitalizing neighborhood business districts, and providing supportive services for residents;
- The City also follows a number of policies that apply to the majority of contracts and economic incentives, such as prevailing wage, a local living wage, Section 3, local hiring preference, and small, minority, and women-owned business hiring preferences; and
- The City consistently uses the maximum 15% of CDBG funding towards public services activities, such as job training, emergency mortgage assistance, tenant representation, fair housing assistance, and mobility program.

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

- Blueprint For Success;
- Family Re-Housing Assistance;
- Compliance Assistance Repairs for the Elderly;
- Emergency Mortgage Assistance;

- Fair Housing Services;
- Hand Up Initiative;
- Homeowner Assistance Repairs for Building Order Relief
- 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 were involved in the development of the Consolidated Plan/Action Plan. In addition, the majority of Consolidated Plan programs are implemented by private organizations which use City funding (including the General Fund) to supplement programs that support Consolidated Plan objectives. The City partners with a Community Development Advisory Board (CDAB) which evaluated program requests and made recommendations in coordinating City programs with service providers. The CDAB is a volunteer 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 representatives (4).

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: the Budget Office, Finance Department, City Planning & Engagement; Office of Economic Inclusion; Public Complaint/Internal Audit; Law Department; Department of Buildings and Inspections, Cincinnati Recreation Commission, and Community and Economic Development. Policies and Procedures Manuals for CDBG and ESG, a Subrecipient Monitoring Manual, and other programmatic Standard Operating Procedures were further developed and adopted beginning in 2021, with ongoing review and revision as needed.

HUD expanded the Integrated Disbursement and Information System (IDIS) for development of the Consolidated Plan, Action Plan, and Consolidated Annual Performance and Evaluation Report processes. The City will continue to 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 close out of projects, drawing of funds, and management of the system. The City will continue its efforts to increase training of staff, execute consistent and accurate written agreements, and have frequent and regular meetings on improving performance.

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

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

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

The Continuum of Care (CoC) is organized on a year-round basis to include several workgroups 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:

CDBG, HOME, ESG, and HOPWA are reported on a calendar year (CY) basis from January 1st through December 31st. The program income amount listed is the amount received to date in CY 2023. All CDBG program income received during the calendar year will be allocated to established programs of the same year.

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

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	188,500
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	188,500

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

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

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

HOME is reported on a calendar year (CY) basis from January 1st through December 31st. The program income amount of \$190,434.11 was received and programmed for CY 2023 activities. It is

Annual Action Plan 2023	44
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expected that \$159,600 will be received in CY 2023 for programming during CY 2024. All program income received during the prior calendar year is allocated to established programs of the next year. The City of Cincinnati plans to continue to operate its HOME Investment Partnerships Program similar to previous years. As such, other forms of investment of equity payments, interest-bearing and non-interest-bearing loans or advances, interest subsidies, deferred payment loans, grants, and loan guarantees are not planned as part of the 2020 – 2024 Consolidated Plan.

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

Throughout the 2020 – 2024 Consolidated Plan, the City will continue to assist homebuyers directly with down payment assistance through the HOME funded American Dream Downpayment Initiative (ADDI) Program. The direct homebuyer assistance provided follows the HOME affordable homeownership limits for the area. Eligible applicants for the ADDI program are accepted year-round on a first-come first-serve basis and must be first-time eligible homebuyers who will own and occupy the home as their primary residence for five years. The City defines first-time home buyers as not having owned a home for at least three years. The City does not limit the beneficiaries or provide preference to any population. The City does not intend to utilize subrecipients or CHDOs in administering the ADDI program. Applications for the ADDI program are available at the City's office and also located on the City of Cincinnati's website: <https://choosecincy.com>

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

The City has established, utilizes, and enforces a recapture provision for the ADDI Program through an ADDI Agreement, promissory note, and mortgage, where HOME assistance is provided to the homebuyer as a deferred forgivable loan and is reduced by 20% for each year the recipient homebuyer owns and occupies the home as their primary residence during the stated affordability period. The City only utilizes the recapture provision for all assistance to homebuyers, and does not utilize a resale provision.

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 implements a recapture provision where recipient developers must repay a portion of the HOME assistance for any unsold homes constructed. As an alternative to recapture, the City permits the developer to avoid recapture if it converts the unsold units into rental units and record a covenant against the applicable units restricting the rental of said units to lower-income households eligible under the HOME income guidelines. The City also directs recipient developers to encourage homebuyers to apply for down payment assistance through the City's ADDI Program.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that

will be used under 24 CFR 92.206(b), are as follows:

The City does not intend to use HOME funding to refinance existing debt during 2020 through 2024.

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

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

ESG funds are used locally to support emergency shelter operations and Rapid Re-housing programs. In order for emergency shelters to receive Emergency Solutions Grant funds, the shelter must be in compliance with the federal regulations outlined in 24 CFR 91 and 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

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

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

5. Describe performance standards for evaluating ESG.

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

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

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

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

6. Discussion: Identified method for selecting project sponsors

The HOPWA entitlement program is administered by Strategies To End Homelessness who receives the 3% of the annual allocation for administration. There are currently 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 as needed to develop and enhance EMSA-wide HOPWA policies and procedures to ensure consistency in service provision.