

City of Hamilton
BUTLER COUNTY OHIO



Annual Action Plan
Fiscal Year 2021-2022

City of Hamilton
Finance Department
Neighborhood Development Division
345 High Street
Hamilton, Ohio 45011

Submit to the U.S. Department of Housing & Urban Development
Spring, 2021

The City of Hamilton has conducted a Substantial Amendment to FY 2021-2022 funds for the purpose of accepting and appropriating HOME-ARP funds.

Executive Summary

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

1. Introduction

The City of Hamilton is submitting the Annual Action Plan for Fiscal Year 2021-2022 in accordance with the 24CFR 91.222. The Annual Action Plan identifies the activities to be funded with Community Development Block Grant (CDBG) resources received during the program year. The City of Hamilton anticipates that approximately \$1,419,359 will be received in CDBG funds and approximately \$386,885 in HOME funds. The CDBG and HOME amounts may be proportionally increased or decreased from the estimated funding levels to match the actual allocation amounts. The City will continue to concentrate its Community Development efforts in four (4) principles areas: Housing, Economic Development, Public Services, and Public Facility Improvements.

Clearance /Demolition

The City is committed to conducting activities that promote and continue the safe dwelling of City residents. More specifically, the City has and may continue to commit funds to the City of Hamilton's Health Department's Clearance/Demolition program. Through the clearance/demolition of unsafe, non-habitable, dilapidated, and/or deteriorating structures the City is able to make the community and members safer.

Housing

The development and maintenance of the City's affordable housing stock is imperative to community development and quality of life. The City will continue to support emergency home repair, housing rehabilitation, other housing stabilization, and production programs. The City will continue to work with partner agencies to develop affordable housing including units targeting very low and low to moderate income residents. Lastly, and as mentioned above the City will continue to clear vacant, unsafe, and blighted residential nuisance properties that adversely impact the health, safety, and welfare of residents.

Economic Development

Expanding economic development opportunities to encourage investments, retain, create jobs, revitalize business districts, and increase employment-training opportunities are a priority for the City.

In addition, the City will continue to provide the access to the Revolving Loan Fund (RLF) to key business and start-up investments.

Public Service

The City of Hamilton focuses its efforts in Public Service in order to address the unique needs of the LMI resident population. The City will continue to concentrate on fair housing, homeless services, affordable public transportation, youth recreation, and crime victim advocacy.

Public Facility Improvements

Improvements to public facilities and infrastructure located in the City that serves LMI residents is critical to community development and quality of life efforts. The world Coronavirus Pandemic has presented a visible strain on the City's public facilities. Especially, facilities that aid in providing medical care to local residents. As a result, the City has evaluated the need and will strive to commit funds in areas that will address the growing need for services. As a whole, the City will make public improvements that enhance and compliment neighborhood safety and community development activities.

The overall objectives of Housing, Economic Development, Public Service, and Public Facility Improvements will continue to be assessed to ensure consistency with citizen input and survey results and feedback. As indicated in the Citizen Participation section of the Consolidated Plan, the City not only conducts the required public input meetings and makes draft documents available for review and comment but also solicits input from service providers and conducts an annual needs survey of City residents.

The Annual Action Plan covers both CDBG and HOME program funded projects for the *2021-2022* Program Year for the period of *May 1, 2021 through April 30, 2022*.

2. Summarize the objectives and outcomes identified in the Plan

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

The City of Hamilton has identified the below listed outcomes through the Annual Action Plan Update process:

- Encourage a healthy, safe, viable, affordable housing stock;

- Partner with a Continuum of Care that easily transitions the homeless population to permanent housing;
- Aid in creating stable, growing, permanent employment opportunities for all city residents;
- Encourage public Services that provide assistance to city residents to become more self-sufficient; and
- Public Facility and Infrastructure Improvements that address and meet the needs of city residents.

The goals, objectives, and related outcomes are listed in the 2017-2021 Strategic Plan. Each were chosen based upon comments and information received during the Public Meeting process, prior years' performance evaluations and needs analysis, current housing market analysis, leverage of funds, City Manager and staff input, and the City's Vision 2020 Comprehensive Plan Update.

3. Evaluation of past performance

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

The City feels strongly that an appropriate and efficient delivery system is in place to carry out past, present, and future activities identified in the Annual Action Plan.

The City has maintained the necessary and required Community Development Block Grant (CDBG) timeliness ratios; HOME rules on reserved, committed and expended funds have been met. The City continues to desk monitor on a monthly basis and site-visit on an annual basis all subrecipients. At times, it is necessary to conduct weekly desk monitoring of subrecipients. New subrecipients may receive two site-visit monitoring sessions during the program year. Subrecipients that have not performed for any reason are evaluated in writing. If non-performing subrecipients cannot or will not meet its agreement obligations, the City terminates its agreement. The City does not allow these subrecipients to apply for future funding until it demonstrates its ability to accomplish obligations. Very rarely has the city had subrecipients who have not complied.

The vast majority of quantifiable evaluation numbers in Integrated Disbursement and Information System (IDIS) have been met. If numbers (goals) are not met, in all cases, justified reasons have been given and accepted by HUD. The City periodically reviews IDIS measures, program goals and overall performance. These reviews are done to ensure that goals, objectives, and priorities are being met.

Evaluation of past performance has led the City to the understanding that the development and maintenance of the City's affordable housing stock is imperative to community development and quality of life. The City aspires to continue minor home repair and housing rehabilitation/stabilization. The City will continue to work with partner agencies to develop affordable housing units for very-low/low income residents. Additionally, the City will continue to clear vacant, unsafe, and blighted residential nuisance properties that adversely impact the health, safety, and welfare of residents.

Evaluation of past performance has also revealed that it is necessary to focus efforts in public service, make improvements to public facilities, and to expand economic development opportunities. The City focuses its efforts in public service to address the unique needs of low to moderate income (LMI) individuals/families in the jurisdiction. The City understands the continued need to concentrate efforts and funds in fair housing, homeless services, affordable public transportation, youth recreation, and crime victim advocacy. The City has found through past performance and evaluation that there is a need for improvements to public facilities and infrastructure. As a result, the City will commit funds to make public improvements that provides reliable services and compliments the City's neighborhoods. In regards to economic development, the City will support programs that encourage investments, retain and create jobs, revitalize business districts and increase employment-training opportunities. The City will continue to provide access to the Revolving Loan Fund (RLF) to key business and start-up investments.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City of Hamilton has worked to create an effective Citizen Participation Process to ensure the appropriate, effective and comprehensive use of Community Development Block Grant (CDBG) and HOME funds. The City uses a four (4) point approach to engage active citizen participation in the Consolidated Planning process which includes a needs assessment survey, public input meetings (two (2) virtual - 1 scheduled impromptu on Aug. 15, 2021)), draft Consolidated and/or Annual Action Plan comment period, and finally two (2) public hearings. As a means of attaining the feedback of residents residing in high poverty/low income areas of the jurisdiction, the City made efforts to contact many local organizations and residents to encourage participation in spite of the Coronavirus Pandemic.

The City of Hamilton continues to make efforts to ensure that all citizens, regardless of language barriers and physical ability, are provided an opportunity to participate in the formulation of both the Consolidated Plan and Annual Action Plan. These efforts include the following:

1. Public Meeting Notification available in English and Spanish;
2. Spanish and American Sign Language (ASL) translation available upon request at all public meetings/hearings and;
3. Extensive consultation with Butler County Homeless Coalition in quarterly meetings;
4. Coordination and posting of Public Meeting Notification in English via social media.

Additionally, all facilities, offices and public/semi-public spaces used for citizen participation are fully accessible for those with physical limitation. Nonetheless, due to the need for social distancing, citizens are allowed to sit outside of council chambers.

5. Summary of public comments

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

Email Survey Summary:

The City of Hamilton utilized a survey method and also public meetings to gather feedback concerning community needs. One of the survey methods utilized was Google Surveys. Approximately 653 emails were sent to persons who work, play, or live in the City of Hamilton. The email provided a link to a survey on Google Surveys. Of the 450 persons emailed, approximately 40 responded and completed the survey. Below is a summary of the responses:

The top Public Service (Significant) needs identified were:

Drug/Substance Abuse Services (82%);

Mental Health Services (72%);

Services for the Homeless (69%);

Youth Services/ Programs (69%);

Child Care Services (56%);

Employment/Job Training (54%);

Services for the Developmentally Disabled (54%);

Fair Housing Services (51%);

57.9% of the respondents responded that the need for emergency/minor home repair programs for low-income City of Hamilton residents is a "Significant Need". 55.3% of the respondents stated that the need for housing rehabilitation in the City of Hamilton is a "Significant Need". 48.7% stated that the need for affordable owner-occupied housing is a "Moderate Need" (Note - This measure is down from its 2020-2021 FY estimate at 80%) . While 46.2% of the respondents responded that there is a "Significant Need" for affordable rental housing in the City.

In regards to Public Facilities, the following top (Significant) needs were identified:

Homeless facilities (72%);
Youth Centers (74%);

Street Repaving/Repair (69%);

Senior Centers-Moderate Need (62%);
Neighborhood Facilities/Centers-Moderate Need (56%).

The "bigger Housing issue" identified by the respondents was identified as "Quality of Housing" at 65%. 50% of the respondents stated that "Historic Preservation" is a "Significant Need". The "removal/demolition of unsafe/dangerous or abandoned buildings" is identified as a "Significant Need" at 70%. The "Economic Vitality of Downtown Hamilton and the Riverfront" was also identified as a "Very Important" at 67.5%. Lastly, 57.5% of the respondents stated that the "improvement of the visual appearance of primary business districts, entryways, and streets is "Very Important".

Mail Survey Summary:

Due to the Coronavirus Pandemic the City of Hamilton elected to not mail surveys.

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

The City of Hamilton considers all comments received.

7. Summary

Amendment Process:

In addition to the FY 2021-2022 CDBG & HOME funds the City anticipates amending funds used in previous fiscal years to conduct allowable and additional activities. The funds being used from previous funding years are included in the attached. A second Substantial Amendment was conducted in the Spring of 2023 to amend, appropriate, and allocate HOME-ARP funds in the amount of \$1,400,858 for housing activities, administration, and CHDO operating expenses.

The City may amend its approved plan whenever it makes one of the following decisions:

- To make a change in its allocation priorities or a change in the method of distribution of funds;
- To carry out an activity, using funds from any program covered by the consolidated plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD), not previously described in the Action Plan; or
- To change the purpose, scope, location, or beneficiaries of an activity.

Substantial Amendment has been defined as and includes the following:

- Major budget adjustment related to financial resources (e.g. reallocation of funds; reimbursements, repayments, recaptures, and/or program income);
- A proposed change in the allocation or selection criteria for programs;
- As determined by HUD.

The City not only follows HUD requirements, but also the locally adopted substantial amendment procedure. Thus, the following adopted procedures will be followed:

- The City should receive an amendment in writing from either a sub-recipient to appropriate staff member. The written amendment will clearly state the reason for the change, the amount of the change, the beneficiary impact as well as any other pertinent information;
- The City will determine whether the amendment request is consistent with the stated and approved local Annual Action Plan and Consolidated Plan;
- The City will make a determination whether to proceed with the proposed amendment;
- The City will publish via social media that a substantial amendment is being considered and where a copy of the written request is available for public review;
- The City will allow a thirty (30) day public comment period; this period will commence upon the date of publication.

The City has included the amendment of funds for the Public Infrastructure project -

In summary, the City anticipates committing funds for Clearance/Demolition, Housing, Economic Development, Public Services, and Public Facilities. Investments in Clearance/Demolition will aid in addressing the need for Clearance & Demolition. Housing projects will aid in increasing the Location/type of affordable housing and the Availability of affordable units. Economic Development commitments will potentially increase economic development opportunities and employment within the City. Public Services commitments have the potential of addressing an array of concerns identified through public feedback. While Public Facilities commitments will aid in improving the overall safety of the City, improve the City's response to Drug/Substance Abuse emergencies, and also improve quick response to emergencies related to the increasing elderly population.

Contingency Provisions:

Upon final allocation notification from HUD the City will proportionally adjust one or more proposed activities' budgets according to the increase or decrease from the estimated funding levels to match the actual allocation amounts.

Amended Funds

YWCA-Site Acquisition: CDBG Administration - Public Facilities - FY 18-19 - \$100,000.00

Total: \$100,000

Public Facilities & Improvements - Public Facilities & Improvements - FY14-15 - \$16,201.22

Public Facilities & Improvements - Public Facilities & Improvements - FY15-16 - \$14,462.01

Public Facilities & Improvements - Public Facilities & Improvements - FY16-17 - \$28,181.46

Public Facilities & Improvements - Public Facilities & Improvements - FY17-18 - \$40,405.31

Public Facilities Contractual - Public Facilities & Improvements - FY19-20 - \$35,000.00

Public Facilities Contractual - Public Facilities & Improvements - FY19-20 - \$4,732.00

Public Facilities & Improvements - Public Facilities & Improvement - FY19-20 - \$40,000.00

Total - \$178,982.00

Public Facilities & Improvements (Contractual Services) - Public Facilities & Improvements - FY 17-18 - \$13,568.00

Public Facilities & Improvements (Historic Hamilton) - Public Facilities & Improvements FY17-18 - \$3,810.00

Housing (Contractual Services) - Public Facilities & Improvements - FY16-17 - \$18,622.00

Total: \$36,000.00

Public Services (YMCA Programming @ BTW) - Public Services - FY17-18 - \$8,585.23

Public Services (YMCA Playground Program) - Public Services - FY17-18 - \$2,152.89

Public Services (YMCA Programming @ BTW) - Public Services - FY18-19 - \$3,758.58

Public Services (Victims Advocacy) - Public Services - FY19-20 - \$7,503.30

Total: \$22,000.00

Public Facilities & Improvements - Public Services - FY17-18 - \$25,750.00

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	HAMILTON	Finance Dept./Neighborhood Development Division
HOME Administrator	HAMILTON	Finance Dept./Neighborhood Development Division

Table 1 – Responsible Agencies

Narrative (optional)

The City of Hamilton's Neighborhood Development Division, a subsidiary of the Finance Department, administers the Consolidated Plan, Annual Action Plan, and CAPER.

Consolidated Plan Public Contact Information

Tomika Hedrington, Neighborhood Development Specialist

City of Hamilton Neighborhood Development Division

345 High Street, 7th Floor

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Tomika.hedrington@hamilton-oh.gov

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

1. Introduction

The priority needs for the Consolidated Plan and Annual Action Plan are determined by consultation with citizens, social service agencies, housing assistance providers and City Council. The five-year Strategic Plan for Hamilton specifies the types of activities that will be pursued based upon available resources. The top Public Service needs identified through the City's public meetings include: Fair Housing & Housing Needs, Drug/Substance Abuse Services, Public Services & Housing Needs, Health Services, Mental Health Services, Services for the Developmentally Disabled, Services for Homeless Persons, Elderly/Senior Services, Crime Awareness/Prevention, Employment & Job Training, Childcare Services, and Services for Battered & Abused Spouses/Children. The top Public Facilities needs identified through the City's public meetings include: Street Repaving/Repair, Homeless Facilities, Public Parks & Recreation Facilities, Senior Centers, Youth Centers. Email survey results varied slightly. As the top Public Service needs identified were: Transportation, Mental Health Services, Youth Services Programs, Drugs/Substance Abuse Services, Services for the Homeless, and Employment/Job Training. While Top Public Facilities needs identified through the email survey included: Homeless Facilities, Street Resurfacing/Repair, Senior Centers (Moderate Need), Solid Waste Disposal (Moderate Need), Neighborhood Facilities/Centers, and Health Facilities. Housing projects in the jurisdiction will be ongoing and other associated projects will continue to be held at a high priority.

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

The City of Hamilton consults with subrecipients, public and assisted housing providers and developers, social service agencies, as well as other government industries regarding coordination efforts in the jurisdiction. The jurisdiction maintains a productive and cooperative partnership with the local housing authority (Butler Metropolitan Housing Authority).

The jurisdiction works cooperatively with the Butler County Housing and Homeless Coalition to ensure priority needs of homeless persons/families and those suffering from mental illness. The jurisdiction has worked to ensure that all aspects of the "Continuum of Care" are being adequately addressed. As a result, the jurisdiction will continue to support aspects of the "Continuum". The City works with local nonprofits that provide direct public services that not only include housing assistance but also health, crime reduction, homeless prevention (e.g. Serve City), fair housing (H.O.M.E.), and transportation services (BCRTA).

Local government coordination and cooperation occurs in the form of consultation and project implementation. The City of Hamilton cooperates with Butler and Hamilton counties to obtain accurate

information concerning persons with HIV/AIDS and the homeless. Lead-based paint hazard reduction is coordinated with the state of Ohio.

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

The City of Hamilton works cooperatively with the Butler County Housing and Homeless Coalition to ensure priority needs of homeless persons and families. The City has worked to ensure that all aspects of the Continuum of Care are being adequately addressed. The City will continue to support aspects of the Continuum, and will do so by participating as an active board member.

The City of Hamilton, as a member of the Butler County Homeless and Housing Coalition, has identified the following objectives to assist the homeless:

1. Create new and permanent beds for chronically homeless persons;
2. Increase the percentage of homeless persons staying in permanent housing;
3. Increase percentage of homeless persons moving from temporary to permanent housing;
4. Increase percentage of homeless persons becoming employed; and
5. Ensure the Continuum of Care has a functional HMIS System.

In addition to collaborating with the local Continuum of Care the City will address the needs of homeless persons and persons at risk for homelessness by collaborating with local service and housing providers to identify and address needs.

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

The City of Hamilton is an active participant in the Butler County Housing and Homeless Coalition (BCHHC). The BCHHC has applied and receives funding through the balance of State Continuum of Care process. The City participates in monthly BCHHC board meetings and anticipates continuing to work with the BCHHC and local agencies to develop a community wide policy for working collaboratively to remedy the issue of homelessness in the community.

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

Table 2 – Agencies, groups, organizations who participated



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

The City of Hamilton consulted with organizations and representatives that could provide applicable and experienced feedback concerning the jurisdiction's housing, homeless, development, and support service needs.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Butler County Housing & Homeless Coalition	The City's CoC has committed to advocating for individuals and families experiencing or facing homelessness, ensuring there is an adequate system of care for those experiencing homelessness, supporting projects that enhance and improve the continuum of care process for those experiencing homelessness in the community, and also positioning the BCHHC as a key leader and influencer in the fight against homelessness in Butler County. The City of Hamilton supports each goal set by the BCHHC and will continue to work in tangent with the organization to eliminate homelessness in the City.

BMHA Annual Plan	Butler Metropolitan Housing Authority	Within BMHA's 2020 Annual Plan it is anticipated that the organization will apply for funding to facilitate the redevelopment of the Riverside Homes public housing sites, these will include, Low-income Housing Tax Credits, New Market Tax Credits RAD, as well as new and unnamed funding opportunities. Additionally, the organizations plans to consider submitting a demolition/disposition application for the Riverside Homes public housing project (OH015-4B).
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Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Hamilton has and plans to continue to consult with various housing providers, community representatives, service providers, business owners, and citizens during the Consolidated Plan and Annual Action Plan processes.

Broadband Specific - During consultation the City had discussions with Hamilton Living Waters and the YMCA concerning the expansion of internet options for local residents. Booker T Washington provides access to free wifi and a computer lab for local residents. Additionally, Living Waters does the same. Both organizations are considering ways to use potential funding in the future to expand their community service.

Resilience Specific - The City of Hamilton lies within Butler County. As a result, the City has access to the resources made available by the Butler County Emergency Management Agency. The said agency, in times of emergency (i.e. floods, natural disasters, hazard mitigation, etc.) is able to respond and lead the City in addressing the emergencies as needed.

AP-12 Participation – 91.105, 91.200(c)

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

The City of Hamilton has worked to create an effective Citizen Participation Process to ensure appropriate, effective, and comprehensive use of Community Development Block Grant (CDBG) and HOME funds. The City uses a four (4) point approach to engage active citizen participation in the Consolidated Planning process which includes a needs assessment survey (online & mail version), two (2) public input meetings/events, draft Annual Action Plan comment period, and finally two (2) public hearings.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
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1	Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p>	<p>The City of Hamilton held its first virtual public meeting on August 19, 2020 via Zoom. The meeting was attended by approximately twelve (12) participants. During the meeting suggestions were made specifically regarding public services and public facilities.</p>	<p>The top five (5) needs that were identified in the public event were: Drug/Substance Abuse Services, Affordable/Accessible Housing, Youth/Senior Services/Programs, Childcare, & Neighborhood Facilities/Centers.</p>	<p>The City of Hamilton takes into consideration all received comments.</p>	
2	Public Meeting	<p>Non-English Speaking - Specify other language: Spanish</p> <p>Non-targeted/broad community</p>	<p>The City of Hamilton held its second virtual public meeting on August 20, 2020. The meeting was attended by approximately three (3) participants. Additional feedback was received concerning public service needs.</p>	<p>During the 2nd public meeting feedback was received concerning housing needs and supportive services for residents in the community.</p>	<p>The City takes into consideration all received comments.</p>	
4	Internet Outreach	<p>Non-targeted/broad community</p>	<p>The City sent approximately 450 emails to persons</p>	<p>The top Public Service needs identified were:</p>	<p>The City takes into consideration all comments received. 3</p>	

			<p>who live, work, or play in the City of Hamilton. Approximately 47 email surveys were completed. 67.4% of the respondents were age 46 and over. 87% of the respondents "owned" their home. While 56.8 stated that the City is able to accommodate its residents who have limited English proficiency.</p>	<p>Childcare Services (56%);Health Services (62%);Services for Developmentally Disabled (54%);Elderly/Senior Services (59%);Crime Awareness/Prevention (51%)Services for Battered and Abused Spouses/Children (51%)Employment/Job Training (54%). 57.9% of the respondents responded that the need for emergency/minor home repair programs for low-income City of Hamilton residents is a "Significant Need". 55.3% of the respondents stated that the</p>	<p>out of 4 of the comments related to public facility improvements. The written comments are attached in the appendix.</p>	
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				<p>need for housing rehabilitation in the City of Hamilton is a "Significant Need". 48.7% stated that the need for affordable owner-occupied housing is a "Moderate Need" (Note - This measure is down from its 2020-2021 FY estimate at 80%) . While 46.2% of the respondents responded that there is a "Significant Need" for affordable rental housing in the City. In regards to Public Facilities, the following top needs were identified: Homeless facilities (72%); Youth Centers (74%) Senior</p>		
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				<p>Centers-Moderate Need (62%);Solid Waste Disposal-Moderate Need (26);Neighborhood Facilities/Centers-Moderate Need (56%). The "bigger Housing issue" identified by the respondents was identified as "Quality of Housing" at 65%. 50% of the respondents stated that "Historic Preservation" is a "Significant Need". The "removal/demolition of unsafe/dangerous or abandoned buildings" is identified as a "Significant Need" at 70%. The "Economic Vitality</p>		
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				<p>of Downtown Hamilton and the Riverfront" was also identified as a "Very Important" at 67.5%. Lastly, 57.5% of the respondents stated that the "improvement of the visual appearance of primary business districts, entryways, and streets is "Very Important".</p>		
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Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Hamilton anticipates utilizing Community Development Block Grant (CDBG) funds in the amount of \$1,419,359 and HOME entitlement funding in the amount of \$386,885 for fiscal year 2021-2022. The City proposes to maintain its Housing Rehabilitation program through its established Revolving Loan Fund (RLF). *The City will continue to work with a local CHDO to provide down-payment and closing cost assistance to qualified persons (persons/families below the 80% median income (AMI) or below. Both the City and the CHDO screen clients using the most recent year HUD income requirements.* The City will collaborate with local non-profit organizations to create housing units for those moving from local shelters into permanent housing. The City will also work with non-profit organizations to develop affordable housing units for extremely low-income residents. The city received a one time allocation of \$1,400,858 in HOME-ARP funds. The funds are being amended to the FY 21-22 AAP.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		

CDBG	public - federa l	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,440,275	30,157	362,732	1,833,16 4	0	PI includes HRLF (\$20010.15) & CRLF (\$10147.34) payments, Misc. Rev. & Local Acct funds.
HOME	public - federa l	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	386,885	4,282	0	391,167	0	
General Fund	public - local	Acquisition New construction for ownership	0	0	0	0	0	Due to the HUD's approval of the waiver of the Match requirement, the City of Hamilton has chosen to accept the waiver of the requirement.

Other	public - federa l	Admin and Planning Housing Public Services TBRA	1,400,858	0	0	1,400,858	0	The city received a special allocation of HOME-ARP funds in the amount of \$1,400,858.
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Table 1 - Expected Resources – Priority Table

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

The Department of Finance/Neighborhood Development Division continues to broaden and strengthen relationships with appropriate agencies and other City of Hamilton departments to implement public and physical improvements, and public services that benefit very-low and low/moderate income city residents. Through these relationships, the City will work to provide minor home repairs to eligible low-income homeowners as well as remove and clear dangerous, dilapidated and vacant buildings.

The objectives of the CDBG and HOME programs include, but may not be limited to, the revitalization, preservation, conservation and redevelopment of neighborhoods; stimulating economic development; and providing public improvements. Each objective aims to benefit persons of low and low-moderate income.

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

The City of Hamilton operates a Landbank Program. Through the program the City may donate landbank property to nonprofit organizations for the development of affordable housing.

Discussion

In the spring of 2023 the city amended FY 21-22 funds to include HOME-ARP funds. As such an additional activity and source of funds have been added.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Clearance and Demolition	2017	2021	Non-Housing Community Development	Low/Moderate Income Areas All HUD eligible areas within the City of Hamilton	Clearance and Demolition	CDBG: \$149,181	Buildings Demolished: 7 Buildings

3	Public Facilities/ Improvements	201 7	202 1	Non- Housing Communit y Developm ent	Low/Mode rate Income Areas All HUD eligible areas within the City of Hamilton	Public Facilities	CDBG: \$907,171	Other: 4995 Other
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4	Public Services	2017	2021	Non-Housing Community Development	Low/Moderate Income Areas All HUD eligible areas within the City of Hamilton	Public Services Homeless Activities AFH Factor 2: Private Discrimination AFH Factor 3: Source of Income Discrimination AFH Factor 5: Lack of Assistance for Transitioning	CDBG: \$190,138	Public service activities for Low/Moderate Income Housing Benefit: 15290 Households Assisted Other: 14000 Other
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5	Economic Development	2017	2021	Non-Housing Community Development	Low/Mode rate Income Areas All HUD eligible areas within the City of Hamilton	Economic Development	CDBG: \$25,147	Businesses assisted: 3 Businesses Assisted
6	Fair Housing	2017	2021	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	Low/Mode rate Income Areas All HUD eligible areas within the City of Hamilton	Fair Housing	CDBG: \$10,000	Other: 125 Other

8	AFH Goal 6: Availability of affordable units	201 7	202 1	Affordable Housing Public Housing Non- Homeless Special Needs	Low/Mode rate Income Areas All HUD eligible areas within the City of Hamilton	AFH Factor 1: Location/t ype of affordable housing AFH Factor 6: Availabilit y of affordable units AFH Factor 2: Private Discrimina tion	CDBG: \$317,060 HOME: \$261,885	Rental units rehabilitated: 1 Household Housing Unit Homeowner Housing Added: 8 Household Housing Unit Homeowner Housing Rehabilitated: 50 Household Housing Unit
11	AFH Goal 3: Source of Income Discrimination	201 7	202 1	Affordable Housing	Low/Mode rate Income Areas All HUD eligible areas within the City of Hamilton	AFH Factor 3: Source of Income Discrimina tion	HOME: \$129,282	Direct Financial Assistance to Homebuyers: 21 Households Assisted

Table 2 – Goals Summary

Goal Descriptions



Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Hamilton's Neighborhood Development Division continues to broaden and strengthen relationships with appropriate agencies and other City of Hamilton Departments to implement physical improvements, special code enforcement, and public services that benefit very-low and -low to moderate income city residents. Through these relationships, the City will work to provide minor home repairs to eligible low income homeowners as well as remove and clear dangerous, dilapidated and vacant buildings.

Projects

#	Project Name
1	Housing CDBG & HOME Activities FY 2021-2022
2	Economic Development - FY 2021-22
3	Public Services FY 2021-22
4	NDD CDBG Administration CAP 20% FY 2021-2022
5	NDD HOME Administration 10% CAP FY 2021-2022
7	NHSH Down Payment & Closing Cost Assistance
8	CHDO Operating Expenses - 5% CAP FY 2021-22
9	Public Facilities FY 2021-22
10	Fair Housing FY 2021-2022
11	HOME-ARP

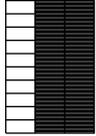
Table 3 - Project Information

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

The City of Hamilton has planned to allocate funds based upon reported community needs, responses collected during the Citizen Participation Process, Public Hearing feedback, and the anticipated success of a program at achieving its goal and meeting community need(s). The City's Neighborhood Development Division advises the City Manager on the Consolidated Plan, Annual Action Plan, resources allocations, and all other matters related to the administration CDBG and HOME funds. Due to limited funding, the City has struggled, over the years, to address all of the needs identified in the community. Nonetheless, the City has and plans to continue to strive to address needs based upon priority level and in a manner that is most beneficial to the community.

In the past, the City of Hamilton has committed funds to improve Public Facilities as they relate to Street Resurfacing & Public Infrastructure. In FY 2019-2020 due to the need to commit funds for emergency response providers, the City of Hamilton City Council unanimously approved a resolution asking the Butler County Board of Elections to place a 4.9 mill street repair levy before votes on the May 7, 2019 ballot. A gasoline tax increase by the State of Ohio was passed and will increase revenue for Street Resurfacing/Repaving projects in the City of Hamilton. The revenue increase is approximately \$1.2M. Additionally, a \$5.00 additional license tax will be effective as of 1/1/2020 which will provide additional funds to Street Resurfacing/Repaving projects. It is anticipated that through the funds the City may repair up to five (5) miles of streets, and also repave up to five (5) miles of streets.

AP-38 Project Summary
Project Summary Information



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

The City of Hamilton has a diverse geographic area consisting of a varying range of income levels and minority groups. Historically, the jurisdiction is split into six (6) wards (1 (North), 1(South), 2, 3, 4, 5, 6 (North), 6 (South). Wards 2, 4, 5, and 6 (North) are the most integrated areas of the jurisdiction. The four (4) wards have populations of Black, Non-Hispanics, Hispanics, and White, Non-Hispanics. The highest population of Black, Non-Hispanics reside in the 2nd ward. The 4th, 5th and 6th (North) wards also possess a very small population of Asian/Pacific Islander, Non-Hispanics.

Results from the City's AFH suggest that individuals/families residing in the 2nd and 4th wards of the jurisdiction are more likely to be exposed to areas of concentrated poverty. The 2nd and 4th wards also possess a greater population of Black, Non-Hispanics and Hispanics.

The above data has prompted the City to continue to focus on projects that benefit individuals/persons residing in areas of the jurisdiction that are segregated (e.g. the City has in the past and plans to continue to commit funds programs the local YWCA, Boys & Girls Club, Butler County Transit Authority, as well as other local programs).

Geographic Distribution

Target Area	Percentage of Funds
Urban Renewal Area	100
Low/Moderate Income Areas	100
All HUD eligible areas within the City of Hamilton	

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

As part of the Consolidated Plan and Annual Action Plan development, the City determined that it is best to focus the limited FY 21-22 funding resources within target geographical neighborhoods. Maps of the five (5) target areas are included in the appendix of the Consolidated Plan and Annual Action Plan. The five areas and corresponding census tracts are Rossville (CT 11), German Village (CT 146), Dayton Lane/North Dayton Lane (CT 6), Wilson Symmes/2nd Ward (CT 3), and Jefferson/North Jefferson (CT 4).

Discussion

The City reviewed 2013-2017 American Community Survey and statistical information for the City of Hamilton . Ten (10) neighborhoods that have been determined to have at least 70% of its population with low and moderate incomes (80% of the City's Median Family Income). The determined neighborhoods are: Bonnacker/Lincoln, Dayton Lane/North Dayton Lane, East Hamilton, German Village, Gordon-Cereal/Star Hill, Jefferson/N.Jefferson, North End, North Lindenwald, Rossville and Second Ward/Wilson Symmes. Information from the U.S. Census Bureau was analyzed and assigned a point value. The following information was used for the analysis: Population, Number in Household, Percentage of Households with Incomes Below \$10,000, Median Household Income, Per Capita Income, Percentage of Population Living below the Poverty Level, Number of Housing Units Vacant, Percentage of Rental Housing Units, and Percentage of Housing Units built prior to 1939. From these ten (10) neighborhoods the five (5) targeted areas were selected.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Hamilton has and plans to continue to invest resources in developing affordable housing not only in the Neighborhood Initiative Area (NIA) but also supports down payment and closing cost assistance through Neighborhood Housing Services (NHS) of Hamilton, Inc.'s, funding for acquisition of vacant properties to be utilized for new development. The City also commits funds to the rehabilitation of occupied units by extremely low/low-income individuals/families.

The City also invests resources in the development of rental housing in conjunction with NHS. The City works with NHS to prioritize neighborhoods, identify sites, and guide the architectural design of rental housing developments.

One Year Goals for the Number of Households to be Supported	
Homeless	480
Non-Homeless	0
Special-Needs	0
Total	480

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	9
Rehab of Existing Units	50
Acquisition of Existing Units	0
Total	59

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

The following programs will aid in providing affordable housing optionsto residents in the City of Hamilton:

NHSH - New Construction - North E Street (8 single family units)

NHSH - Down-payment/Closing Cost Assistance (approximately 21 households)

NHSH - 513 S 4th Street (1 single family unit)

AP-60 Public Housing – 91.220(h)

Introduction

The City of Hamilton's public housing is administered and managed by Butler Metropolitan Housing Authority (BMHA). BMHA has the ability to operate throughout Butler County. Currently 50% of all public housing units administered by BMHA are within the City of Hamilton. BMHA maintains approximately 1142 Public Housing units and 545 Housing Choice Vouchers as of February 2016 (per BMHA Administration). BMHA's units range from studio to four-bedroom apartments. One of BMHA's most recent projects includes the Beacon Pointe redevelopment, phase 1 of the development added 60 dwelling units on a vacant site within a significant needs area.

BMHA conducted a market analysis in 2005 to determine the types of units needed for future demand. BMHA's units in the City of Hamilton range from twenty to over sixty years in age. The units are primarily large family three and four bedroom units. BMHA has concluded that based on current demand and demographics smaller units (e.g. one and two bedroom units) will be needed in the future. Additionally, senior housing units have experienced an increase in demand. As the number of elderly/senior population in the jurisdiction increases. - Note - BMHA has not updated its Annual Plan due to COVID. It is anticipated that their annual plan will be updated in 2022.

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

BMHA plans to investigate the possibility of partnering with U.S. Department of Veteran's Affairs Administration as well as other agencies to provide veteran housing. BMHA plans to accomplish this by potentially utilizing several options including site based waiting list with specific preferences for veterans.

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

BMHA utilizes the following strategies to encourage public housing residents to become more involved with management and participate in homeownership:

BMHA encourages the development of Resident Councils at each of their housing sites;

BMHA is actively working with Supports to Encourage Low Income Families;

BMHA is actively working with Neighborhood Housing Services (NHS) to provide information to possible PHA residents and HCV participants.

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

N/A

Discussion

During the period of BMHA's 5yr/Annual Action Plan, the PHA has completed Beacon Pointe (60 units of affordable housing), and the demolition/disposition of Midtown Village.

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

Introduction

The City of Hamilton is an active participant in the Butler County Housing and Homeless Coalition (BCHHC). The BCHHC and Homeless Coalition apply and receive funding through the Balance of State Continuum of Care process. In addition, the City of Hamilton along with Butler County and the City of Middletown has pledged financial assistance to the Butler County Housing and Homeless Coalition.

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

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

The City seeks input from homeless persons through the solicitation of feedback during public meetings (e.g. Serve City) and the distribution of Public Needs Assessment surveys at public locations and online.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Hamilton routinely commits funding to address the needs of homeless individuals/families residing in emergency shelters or transitional housing (e.g. funding to local nonprofit organizations to support infrastructure repairs to a local shelter, etc.). The City also commits CDBG funds for a Victim's Advocacy Program (VAP). The VAP provides counseling and assistance to local victims of domestic violence.

Several community-wide agencies assist with homeless prevention such as rent and utility assistance through Supports to Encourage Low Income Families (S.E.L.F.) and the local Community Action Partnership of Greater Dayton, Ohio area office. Emergency shelter assistance is also provided via a voluntary church hospitality network, CHOSEN in Hamilton and SHALOM in nearby Middletown. Additionally, the City supports Transitional Living, Inc.'s working relationship with Butler Metropolitan Housing Authority (BMHA) to address the needs of homeless individuals/families with special needs.

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

The City of Hamilton plans and will continue to commit funds and support to programs and community organizations to assist homeless person in making the transition to permanent housing and independent

living. The City anticipates funding Serve City's Supportive Services program. The project "provide mentoring and case management services to connect homeless persons/families with needed support in the community. The City also commits funds to the City of Hamilton's Internal Services for the Victim's Advocacy Program. The program provides counseling services to children and non-offending family members who have experienced trauma as a result of abuse. The program also provides assistance to individuals seeking to file Domestic Violence Civil Protection Orders (CPO) in the Butler County Domestic Relations Court.

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 City of Hamilton has and plans to continue to assist low-income individuals and families from becoming homeless. As a result, the jurisdiction has partnered with and will facilitate discussions with local publicly funded institutions, systems of care, and organizations receiving assistance from public or private agencies to address the housing, health, social services, employment, transportation, education, or youth needs of the stated individuals and families. An example of programming supported by the City utilizing CDBG funds includes the support provided to the local YMCA - Booker T Washington Community Center, Victim's Advocacy Program, and Serve City's Supportive Services Program. Additionally, the City provides funding to the YWCA's Fierce Girls Program. The program provides identify potential victims of trauma and refer them to services that may aid in their recovery.

Discussion

The City of Hamilton will continue to promote and provide services to assist low-income and/or homeless individuals and families.

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

Introduction:

Two factors that affect the affordability of housing in a community are local property taxes and utility costs. According to the Butler County Auditor, **Rates of Taxation in Butler County, Ohio Tax Year 2020** the total effective rate class one for the City of Hamilton and the Hamilton City School District are as follows: Hamilton's taxes have decreased and are 53.41 mills as compared to: 50.61 mills for Fairfield City; 51.45 mills for West Chester Township; 45.44 mills for Oxford; and 65.91 mills for Middletown.

Hamilton owns and operates its own water, sewage treatment, gas and electric utilities. The gas and electric rates are generally less than other areas in Butler County that are served by Duke Energy. Hamilton's water costs are nearly one-third less than the County rates. Neither local taxes nor municipal utility costs are deemed barriers to affordable housing in Hamilton.

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

The City of Hamilton will facilitate discussions with the City of Hamilton's Planning Commission to determine whether changes may be made to zoning and code requirements for housing units of families with five or more members.

Discussion:

Feedback gathered during the Assessment of Fair Housing process suggests that zoning and code requirements make the process of creating large housing units difficult. As a result the City plans to assess the zoning and code requirements.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Hamilton has and will continue to commit to actions that encourage and promote improvements to public facilities, economic development, public services, acquisition/new construction, and housing/rehabilitation. One example may be seen through the City's commitment to provide fair housing and tenant-landlord counseling services to local residents. The City continuously strives to eliminate housing discrimination and create a diverse and inclusive community.

Actions planned to address obstacles to meeting underserved needs

The City continues to invest resources into community development efforts that leverage and increase positive activities in distressed neighborhoods. These investments include Affordable Housing Development activities, Lead Safe Work Practices, and the Neighborhood Overlay Conservation Zoning District

Actions planned to foster and maintain affordable housing

The City of Hamilton has and plans to continue to invest resources in developing affordable housing throughout the jurisdiction. The City also supports down payment and closing cost assistance through Neighborhood Housing Services (NHS) of Hamilton, Inc., and also funding for acquisition of vacant properties to be used for development.

Actions planned to reduce lead-based paint hazards

In an effort to reduce hazards in the City of Hamilton, the City utilizes Lead Safe Work Practices. These efforts lead to the creation of a residential facade program. The program encourages work to improve the exterior of income eligible owner occupied housing structures and improve its standard condition.

Actions planned to reduce the number of poverty-level families

The City feels that poverty reduction is an ongoing process. However, the City attempts to quantify program and project outcomes to measure against assumed baseline figures. As an example, the City assumed that approximately 853 housing units have lead based paint issues (using HUD's formula for

calculation). The City recognizes that lead abatement is proposed to be done on four (4) units. Therefore, we can reasonably assume that approximately 849 units will have lead paint issues after the next grant cycle. Depending on projects and programs, baseline measures have and will continue to be developed. Additionally, the City uses statistical information for calculating the reduction rate of poverty. The three- (3) most used sources to determine the extent of poverty reduction by the City is unemployment rate, census income information and local income tax information.

Additional services planned to reduce the number of poverty-level families may include but not be limited to services for children, the elderly, job connection shuttle services, community outreach services, supportive homeless services, fair housing services, and victim's advocacy support services.

Actions planned to develop institutional structure

The delivery system in the City of Hamilton was enhanced by the development of a communications process with public service providers. Representatives from social service agencies and housing providers are part of the system. The formation of this process resulted in the community working together to identify problems, priorities, strategies and action plans to assist Hamilton citizens. The City is working toward closing gaps through consultation with citizens, community service providers and local public institutions, private industry, and nonprofit organizations.

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

Public Institution:

The City of Hamilton's Neighborhood Development Division will administer both the CDBG and the HOME programs. Funds will be used for a variety of activities which include, but may not be limited to, home owner home rehabilitation, home buyer assistance, capital improvements, economic development, and technical assistance to nonprofits and public services also operated by nonprofits organization in the City. The City may assist other public or nonprofit groups in providing other types of affordable housing assistance.

The Butler Metropolitan Housing Authority (BMHA) will continue and is responsible for carrying out the Comprehensive Public Housing Grant and Section 8 Voucher programs. As well as operating low income housing units. BMHA operates countywide and City of Hamilton Council appoints one board member to BMHA's board while the remaining members are selected by the County Commissioners. With the exception of BMHA units in Middletown, Ohio, BMHA owns and operates the majority of housing units located in the City of Hamilton. The City of Hamilton encourages all residents to participate in community planning efforts and the management of their units.

Private Industry

Private sector involvement includes financial institutions providing assistance via mortgage loans to assist with private rehabilitation (owner and renter) and also the first-time homebuyer program operated by Neighborhood Housing Services of Hamilton (NHS). There may also be private sector involvement in low-income housing tax credit projects for housing rehabilitation or new construction to increase affordable rental and home ownership opportunities.

Discussion:

Program Specific Requirements

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

Introduction:

Revolving loan funds and Program income for the City (in the past) has been generated through the following projects:

Housing Revolving Loan Fund - \$20,010.15;

Commercial Revolving Loan Fund - \$10,147.34; and

Miscellaneous Income Received - \$0.00.

The City's CDBG & HOME programs do not receive funds from urban renewal settlements, or float-funded activities.

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	30,157
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:	30,157

Other CDBG Requirements

1. The amount of urgent need activities	0
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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.

85.00%

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

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

N/A

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:

The affordability period is determined by the total investment of HOME funds in the unit, regardless of whether or not the funds are reflected in buyer financing. If the assisted property is sold while under the resale restrictions, the home must be sold to a HOME eligible buyer approved by the jurisdiction. The price at resale must provide the original HOME assisted homebuyer a fair return on the investment and be affordable to a reasonable range of low-income buyers. Therefore, sales price during the affordability period could occur at fair market value with the following limitations:

Fair return on investment is defined as the purchase price, plus 25% of the increase, if any, in value at the time of resale based on the valuation performed by a qualified Ohio-licensed appraiser. The appraisal would be the objective standard used at the time of the original purchase and at time of resale. The value of capital improvements, if any, would be determined by the value appraised at the time of resale. The sales price shall not exceed a price that results in net proceeds (after first lien and seller closing costs) to the seller that exceeds:

1. the reimbursement of the original owner's investment including down payment and closing costs made at the time of initial purchase, if any;
2. the value of capital improvements, if any, to the property as determined by an appraisal;
3. the principal amortized on the first lien during the period of ownership.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired

with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The participating jurisdiction (PJ) uses the "recapture" method under the HOME program as required by 92.254. Specifically: • The PJ uses the pro rata reduction model of recapture amount during affordability periods for HOME programs unless developer subsidy is used; • Recapture amount is the direct subsidy received by homeowners in the PJ's homebuyer assistance program; • The amount of recapture is limited to net proceeds from the sale or transfer of title whether voluntary or involuntary. Net proceeds are defined as sale price minus superior loan repayment (other than HOME funds) and closing costs. The participating jurisdiction (PJ) uses the "resale" method under the HOME program as required by 92.254 specifically: • The PJ uses the resale model for new construction for homeownership when there is only development subsidy such as when Habitat for Humanity develops new construction for homeownership. In instances where recapture or repayment occurs the jurisdiction will allocate the said funds into the next program year.

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:

N/A

Note -

The City's Revolving Loan Funds generate income from loan repayments and payoffs.

The City and its local CHDO work together to provide a Homebuyer Assistance Program utilizing HOME funds. Households for the program are screened by the local CHDO who also serves as the advertising organization for the program (e.g. applications are available at the local CHDO's office). Households applying for the program must have a total household income at or below the 80% area median income.

Properties purchased under the Homebuyer Assistance Program are limited to single family homes within the jurisdiction. Additionally, the City utilizes HUD's HOME affordable homeownership limits based on 95% of the local median purchase price for new construction. The City nor CHDO limits household participation due to race, color, sex, religion, national origin, disability, sexual orientation, gender identity, and/or familial status.

