



Development
Services Agency

Program Year 2019 Ohio Consolidated Plan Draft Annual Action Plan Executive Summary

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Introduction

This Executive Summary is being provided pursuant to the March 13, 2006 revisions to the U.S. Department of Housing and Urban Development (HUD) Consolidated Plan regulations. Those regulations require that an Executive Summary be prepared, which must include:

- A summary of the citizen participation and consultation process.
- A summary of proposed revisions.
- Objectives and outcomes and an evaluation of past performance.
- Summary of Comments received.

The Ohio Development Service Agency's (ODSA's) Office of Community Development (OCD) annually receives funding from the U.S. Department of Housing and Urban Development (HUD) five programs: the Community Development Block Grant (CDBG) Program, the HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant (ESG) Program, the National Housing Trust Fund (NHTF) and the Housing Opportunities for Persons With AIDS (HOPWA) Program. Prior to receiving and distributing these funds, Ohio must first prepare an annual Consolidated Plan in accordance with the requirement at 24 CFR Part 91 Subpart D, Sections 91.300 – 91.330. HUD regulations require that, in preparing the annual plan, the state must develop and follow a planning process that incorporates a citizen participation plan. The plan must include a method of distribution, as well as a description of other actions that will be undertaken in support of the state's proposed programs and activities.

The revisions that are proposed in the Program Year 2019 Ohio Consolidated Plan Annual Action Plan are summarized below. Only significant program revisions are listed, not minor revisions.

PY 2019 Citizen Participation and Consultation Process

The OCD completed a number of activities designed to obtain comments, perspectives, and citizen opinions to prepare the PY 2019 Ohio Consolidated Plan Annual Action Plan. Notification of all public hearings and meetings was made at least 10 days in advance of the meetings through newsletters, direct mail and posting on the OCD's website at http://development.ohio.gov/cs/cs_ocp.htm. Records of these actions and documentation are available for review at the OCD office between 8 a.m. and 5 p.m. at 77 South High Street, 26th floor in Columbus, Ohio. All facilities and meeting times selected as part of the citizen participation process were chosen to accommodate persons with disabilities. The specific citizen participation activities are described as follows.

1. Consolidated Plan Advisory Committee Meeting

The PY 2019 Ohio Consolidated Plan Advisory Committee met on September 13, 2018, to provide input prior to drafting the PY 2019 Ohio Consolidated Plan Annual Action Plan and the Public Hearing on Needs. The Ohio Consolidated Plan Annual Action Plan Advisory Committee is comprised of statewide stakeholders that represent a variety of organizations that are involved with programs and issues related to affordable housing, community and economic development and homelessness and supportive housing.

2. Public Hearing On Needs

The OCD held a public hearing on needs issues on September 6, 2018, in Room 1960 on the 19th Floor of the Riffe Center, in Columbus. The OCD mailed Notification of the Public Hearing on Needs information to local communities, organizations and agencies throughout the state at least 30 days in advance. The ODSA also published the notification on the OCD's website. The notification summarized the state's planning process for the Ohio Consolidated Plan Annual Action Plan, and solicited participation in OCD's Program Advisory Committee meetings. The OCD accepted written comments on needs issues for 15 days prior to the meeting (from September 1, 2018 to September 16, 2018). Comments made at the Public Hearing on Needs, or received by the OCD prior to the conclusion of the hearing, were distributed to the advisory committee members for consideration during the planning process.

3. Program Advisory Committees

The OCD held five Program Advisory Committees on October 30 and 31, 2018. At least 10 members comprised the Program Advisory Committees, including local officials, program administrators, nonprofit organizations, and other agencies, organizations and individuals familiar with OCD's programs. The OCD solicited participation on the Program Advisory Committees by directly mailing information to all local communities, organizations and persons on the OCD mailing list, which includes communities and organizations. The mailing also provided notification about the Public Hearing on Needs. The following Program Advisory Committee meetings were held:

- Community Development Program/Economic Development/Residential Public Infrastructure Program Advisory Committee
- Fair Housing/New Horizons Program Advisory Committee
- Community Housing Impact and Preservation Program Advisory Committee
- Homeless Crisis Response Program / Housing Assistance Grant Program Advisory Committee
- Housing Opportunities for Persons with AIDS Program Advisory Committee

Note: the Housing Development Assistance Program administered by the Ohio Housing Finance Agency (OHFA) Program Advisory Committee meeting was held during OHFA's annual conference in November 2018.

4. Notification of Updates Made to the Draft PY 2019 Annual Action Plan Post-Public Hearing

On March 1, 2019, the OCD will send notification to local communities, agencies and organizations, informing them that the Draft PY 2019 Ohio Consolidated Plan Annual Action Plan and Executive Summary are available on the OCD's website for review and comment at http://development.ohio.gov/cs/cs_ocp.htm. This notification will also announce the beginning of the mandatory 30-day public comment period on the draft plan, including a public hearing on March 13, 2019, at 10:30 a.m. at 77 South High Street, Room 1932, Columbus, Ohio. All comments received will be included along with responses in the final PY 2019 Ohio Annual Action Plan submitted to HUD.

5. Submission to HUD

The final Ohio Consolidated Plan Annual Action Plan document will be submitted via Integrated Disbursement Information and Information Systems (IDIS) to HUD for a 45-day review period after the final allocation is released. Posting notification and availability of the final PY 2019 Ohio Consolidated Plan Annual Action Plan will be sent to local communities, agencies and organizations throughout the state.

Draft Program Year (PY) 2019 Ohio Consolidated Plan Annual Action Plan Summary of Proposed Revisions

Community Housing Impact and Preservation (CHIP) Program

The OCD proposes the following changes for PY 2019:

PY 2019 CHIP Program Eligible Communities:

The following communities will now be eligible to apply for the PY 2019 CHIP Grant Program based on the updated 2011 – 2015 ACS LMI data released in February 2019.

- [Amherst](#)
- [Cortland](#)
- [North Ridgeville](#)
- [Ontario](#)

Housing Assistance Grant Program

There are no major changes proposed for PY 2019.

Housing Development Assistance Program

OCD proposes the following changes for PY 2019:

Housing Development Gap Financing (HDGF)

- The total maximum request for a project will be \$1,250,000. Of that, the maximum request for OHTF will be \$500,000 and the maximum request for NHTF will be \$750,000. The maximum amounts will be based on funding availability.
- The previously approved Con Plan set the maximum amounts per development at \$450,000 in HOME PJ's, \$700,000 in HOME Non-PJ's and \$750,000 for permanent supportive housing.

Competitive Review

- Applications submitted for the Bond Gap Financing program will be evaluated based on the following criteria: 1) experience and capacity of the applicant and development team; 2) financial feasibility of the development; 3) site selection; 4) development design; 5) demonstrated market for the development and 6) policies as stated in the program guidelines. The OHFA reserves the right to prioritize projects located in non-Participating Jurisdictions, projects preserving existing affordable housing, or projects undergoing a RAD conversion, as well as projects meeting the priorities specified in the NHTF Allocation Plan.

CHDO Operating Grant Program

There are no major changes proposed for PY 2019.

Homeless Crisis Response Program

The OCD proposes the following changes for PY 2019:

Eligible Applicants:

- OCD is considering a pilot program to award shelter funding to a single, lead organization in a Continuum of Care that would then partner with emergency shelters in the Continuum to provide funds for operational support. The pilot would be similar to the HUD CoC Unified Funding Agency (UFA) designation. Only Continuum that have a UFA designation by HUD would be eligible to participate in the Pilot. Following a lively discussion at the Advisory Committee meeting, the OCD will continue seeking input during early 2019 prior to making a final decision about the Pilot.

Funding Method:

- Additional funds may be available for Rapid Re-Housing activities targeted to individuals and transition age youth. If additional funds are available, applicants will be able to compete for such funding based on

a program design evaluation, HMIS data quality and outcomes, coordination, need for Rapid Re-Housing to fill an identified gap, and program capacity.

Homelessness Prevention and Rapid Re-housing:

- Legal services have been removed from the list of approved Housing Relocation and Stabilization Services.

Rating Criteria (Emergency Shelter):

- The percentage of adults receiving at least one non-cash benefit has been added as an HMIS/Outcomes performance measure.

Rating Criteria (Housing Stability):

The rating criteria for housing stability projects has been included in the PY 2019 Annual Action Plan.

Program Amendments:

- For Housing Stability grants, a formal grant amendment is only necessary when a grantee wishes to transfer funds into a restricted budget category (administration or data collection/evaluation). Previously the only restricted budget category listed was administration.

Supportive Housing Program

The OCD proposes the following changes for PY 2019:

Rating Criteria:

The rating criteria used to evaluate grant applications has been updated.

Housing Opportunities for Persons with AIDS Program

There are no major changes proposed for PY 2019.

Community Development Program

The OCD proposes the following changes for PY 2019:

Goal:

- The Community Development program will no longer set-aside funds for the Downtown Revitalization Program. The Downtown Revitalization Program is now listed under the CDBG Target of Opportunity program.
- Language that indicated that Neighborhood Revitalization projects and activities can support redeveloping Brownfield sites has been removed.

Application Guidelines:

- A project cannot be included in multiple competitive set-aside or open cycle program applications. Previously this was only limited to projects included in multiple competitive set-aside applications.

Allocation Program

Allocation Calculation Principles:

- The language that encouraged counties to apply on behalf of the city has been removed. There is no targeted funding requirement for PY 2019.
- The LMI data that is used to determine eligible Allocation communities has been updated as of February 2019. The funding allocation for cities attaining a total population of 15,000 or greater and a LMI population of at least 30 percent with subsequent data releases (e.g. 2011-2015 American Community Survey Low/Moderate Income Summary Data (updated in 2019)) will be provided as dedicated funding to the county of jurisdiction at the \$150,000 grant floor.

Community Development Implementation Strategy:

- The Community Development Implementation Strategy application requirement will now apply to CDBG

Target of Opportunity grant applications.

Planning Activities:

- Communities may use no more than \$20,000 for eligible planning activities. This limit had previously been set at \$15,000. Waivers can still be requested to exceed that amount.

Neighborhood Revitalization Grants

Grant Ceiling:

- The total grant ceiling has been increased from \$500,000 to \$750,000.

Grant Ceiling:

- The total funding cap per grant for demolition/per activities has been increased from \$100,000 to \$175,000 or 25 percent of the project request, excluding administration.

Critical Infrastructure Grants

Critical Infrastructure Program Principles:

- Projects may include multiple activities that together contribute to a failed or failing condition.

Local Program Benefit/National Objective:

- Public facilities may now qualify under the spot slum and blight national objective. Applicants are required to submit a Building Conditions Survey – Single Building and Spot Slum and Blight Certification.

Economic Development Loan and Public Infrastructure Grant Program

The OCD proposes the following changes for PY 2019:

Economic Development Loan Program

The OCD proposes the following changes for PY 2019:

Drawdown Procedure:

- The drawdown procedure language that stated all public and/or private funds must be expended on pro-rated basis with CDBG funds has been removed.

Local Program Benefit:

- If 51 percent of the jobs created and/or retained are not taken by low- and moderate-income persons, the business must document that at least 51 percent of the jobs created and/or retained were made available to low- and moderate-income persons. The business must demonstrate that the number of low- and moderate-income persons interviewed is at least 51 percent or three (3) times the total number of jobs committed to be created. Previously, it had been stated that only jobs created or retained must be made available to low-and moderate-income persons.

Economic Development Public Infrastructure Grant Program

The OCD proposes the following changes for PY 2019:

Ineligible Activities:

- Area-wide infrastructure projects in a community's defined central business district will not be funded under the Economic Development Public Infrastructure Grant Program. The Community Development Programs are available funding sources for downtown-related infrastructure projects.

Local Program Benefit:

- If 51 percent of the jobs created and/or retained are not taken by low- and moderate-income persons, the business must document that at least 51 percent of the jobs created and/or retained were made available to low- and moderate-income persons. The business must demonstrate that the number of low- and moderate-income persons interviewed is at least 51 percent or three (3) times the total number of jobs committed to be created. Previously, it had been stated that only jobs created or retained must be made

available to low-and moderate-income persons.

Residential Public Infrastructure Grant Program

There are no major changes being proposed for PY 2019.

Target of Opportunity Grant Programs

CDBG Economic and Community Development Target of Opportunity Program

The OCD proposes the following changes for PY 2019:

Eligible Activities:

- Public Service and Planning projects will now be considered on a case by case basis.

Downtown Revitalization Target of Opportunity Program

The OCD proposes the following changes for PY 2019:

Total Funds:

- The Downtown Revitalization Program will now be included in the PY 2019 Con Plan as a CDBG Target of Opportunity Grant Program. The program was previously a competitive set-aside grant program. The grant ceiling will be reduced to \$250,000 per award.
- Total funds will not exceed 50 percent of PY 2019 CDBG Target of Opportunity Grant Programs funding.

Spot Slum and Blight:

- Projects entailing a single property located outside of a designated blighted area must qualify under the Spot Slum and Blight National Objective. Activities qualified under the Spot Slum and Blight National Objective are restricted to those that eliminate specific conditions detrimental to public health and safety.
- Previously applicants were only eligible to apply under the Area Slum and Blight Designation that required all buildings inventoried in a defined geographic area to determine if over 51 percent fell under the definition of slum, blighted or deteriorated.

Historic Preservation:

- Historic preservation activities must be undertaken in such a way that allows the property to maintain its historic designation. This requirement was added from the previously approved plan.

Administrative Cost:

- The amount available for administrative costs has been reduced. The previously approved maximum limits of “\$30,000 or 15 percent of the CDBG project costs, whichever is less,” has been adjusted to “a maximum of \$25,000 or 10 percent of the total CDBG project cost, whichever is less.”

Business/Building Owner Program Participation:

- Applicants will now be required to have firm participation commitments from business/building owners, and a detailed scope of work and cost estimate for each project. Cost estimates must be calculated using applicable federal prevailing wage rates. All work must be completed by third-party contractors; business/building owners may not use in-kind or donated labor or be paid with CDBG funds.

Number of Projects:

- Applicants are limited to three (3) building rehabilitation projects per grant award. Applicants may assign funds without a per project grant ceiling or floor.

New Horizons Fair Housing Assistance Program

There are no major changes proposed for PY 2019.

Ohio Housing Trust Fund (OHTF) Special Projects Grant Program

The OCD proposes the following changes for PY 2019:

Goal:

- The goal statement now indicates that projects that are not feasible in other funding categories are eligible to apply. It is now stated that proposals must align and support ODSA's priorities and programs.

Total Funds:

- The funds made available for the SFY 2020 Ohio Housing Trust Funds Special Projects Grant Program will not exceed 2 percent of the total OHTF SFY 2020 Allocation, which has yet to be determined.
- In previous year's OHTF Allocations the total amount available for special projects or target of opportunity projects was not indicated.

Matching Funds:

- Signed letters of commitment must now be included as part of the application verifying the one-to-one match requirement.

Administrative Capacity Statement:

- A description of administrative capacity to administer program, identifying the staff assigned to administer the grant should be included.
- The applicant can discuss the organization's past historical success administering the program or how they seek to improve program administration moving forward if they had findings in past monitoring.

Implementation Plan:

- The program period should be stated in the application with milestones for project completion identified.

Application Review:

The following rating criteria have been updated:

- Impact (Maximum of 40 points)
 - The proposal will include outcomes that address a specific need in the project description; The proposal will leverage other resources with commitment letters included; and, The proposal will benefit persons or households at or below 50 percent area median income (AMI).
- Program Design (Maximum of 40 points)
 - Proposals considered for Special Projects funds must be inappropriate for funding from other state housing programs, either because of eligibility, program scope or project timing; The proposal cannot be funded with other OHTF-funded programs; and, Extent to which the project or activity fills an unmet need or gap by providing activities that benefit persons at or below 50 percent AMI
- Administrative Capacity (Maximum of 10 points)
 - Description of administrative capacity to administer program.
 - The Implementation Plan is reasonable with milestones clearly identified.
- Quality of Application (Maximum of 10 points)
 - Includes all required attachments.
 - Board Resolution is included.
 - Application is submitted on time.

Homelessness Target of Opportunity Program Grants

There are no major changes proposed for PY 2019.

Program Goals, Objectives, Performance Measures and Indicators

This section provides information on performance measures that were developed as part of the PY 2015-2019 Consolidated Plan Strategy. Note, the data for the performance indicators is based on the projected outcomes that were stated in the grant application and grant agreement based on the allocation of the latest fiscal year's funding, although the program period for many grants extends beyond a single year period. While these outcomes may vary to some extent from the actual outcomes, historically the variation has been negligible. Therefore, the Office of Community Development has concluded that it is of more value to begin the process of performance measurement based on grant award information than wait for two years or more when the grants are completed and actual outcome data is available.

Regarding long-term goals, it should be noted that the U.S. Department of Housing and Urban Development funding has been declining for several years, while costs have continued to escalate due to a variety of factors. In such an environment, it becomes increasingly difficult to attempt to measure performance as compared to long-term production goals established several years ago. Instead, the performance measures and indicators are focused on communicating the nature and extent of the impacts of programs contained in the Consolidated Plan, particularly as they affect Ohio's communities and residents.

The following Annual Goals and Objectives were developed as part of the PY 2015 – 2019 Consolidated Plan submitted to HUD in IDIS. Though a great deal of "output" measurement data (number of units, linear feet, etc.) is reported to HUD annually, HUD is looking for "outcome" data that shows how HUD programs impact communities. Recently, HUD developed as part of the eCon Planning Suite a prescribed method to report accomplishments based on funding sources in order to meet the 5-year strategic goals. The Annual Goals and Objectives are selected from a limited number of Goal Outcomes Indicators and Units of Measurements, thus the measurements that are currently reported differ from the previously reported performance measures in that they are not as specific.

Housing Preservation and Accessibility Goal

To provide funding for a flexible, community-wide approach to preserving and making accessible affordable owner and rental housing for low- and moderate-income (LMI) households by bringing the housing unit up to program standards and codes, eliminating hazards and deficiencies in major systems, and reducing maintenance cost.

Goal Outcome Indicator	Unit of Measurement	Quantity
Rental units Rehabilitated	Household Housing Unit	125
Homeowner Housing Rehabilitated	Household Housing Unit	1,000

Creating New Affordable Housing Opportunities Goal

To provide funding for a flexible, community-wide approach to creating new affordable housing opportunities for low- and moderate-income (LMI) persons.

Goal Outcome Indicator	Unit of Measurement	Goal
Rental Units Constructed	Household Housing Unit	125
Homeowner Housing Added	Household Housing Unit	30

Supportive Housing and Fair Housing

Provide supportive housing services to assist lower-income households with acquiring or maintaining housing, which can include downpayment assistance, fair housing activity with CDBG funds or tenant based rental assistance through the use of HOME funds. Additional supportive housing activities can include activities funded through the New Horizons Fair Housing Assistance Program that allows for the funding of activities that affirmatively further fair housing through the use of CDBG funds.

Goal Outcome Indicator	Unit of Measurement	Quantity
Direct Financial Assistance to Homebuyers	Households Assisted	100
Tenant-based rental assistance/Rapid Rehousing	Households Assisted	200

Homelessness and Supportive Housing Goal

To provide a continuum of housing/services to prevent persons from becoming homeless and rapidly re-housing persons when homelessness does occur by: providing homelessness prevention services and assistance; moving persons from homelessness to permanent housing through the provision of housing placement, emergency shelter, rapid re-housing, and project-based transitional housing; and providing long-term permanent supportive housing to homeless persons with disabilities. The estimated total number of outcomes for the PY 2018 CAPER will include households and persons assisted with ESG funds.

Goal Outcome Indicator	Unit of Measurement	Quantity
Tenant-based rental assistance/Rapid Rehousing	Households Assisted	600
Homeless Person Overnight Shelter	Persons Assisted	18,000
Homelessness Prevention	Persons Assisted	1,000

HOPWA Goal

The HOPWA Program provides annual information on program accomplishments in meeting the program's performance outcome measures: maintain housing stability; improve access to care; and reduce the risk of homelessness for low-income persons and their families living with HIV/AIDS.

Goal Outcome Indicator	Unit of Measurement	Reported Outcome
Tenant-based rental assistance/Rapid Rehousing	Households Assisted	1,167

Community Development Infrastructure/Facilities Goal

Improve the public facilities and infrastructure in lower-income areas through LMI area-wide benefit activities, in Slum and Blight areas or on a spot Slum and Blight basis.

Goal Outcome Indicator	Unit of Measurement	Quantity
Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	650,000
Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	100
Facade treatment/business building rehabilitation	Business	150
Buildings Demolished	Buildings	20

Community Development Public Services Goal

Provide direct assistance to LMI persons, such as housing assistance, or needed services currently unavailable in the community.

Goal Outcome Indicator	Unit of Measurement	Quantity
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Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	125,000
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Community Development Health and Safety Goal

Address LMI persons' basic health and safety needs by providing households with potable water and/or sanitary sewage systems that meet state and federal standards, improved fire protection due to equipment and facilities acquired or improved with community development assistance and addressing imminent or immediate threats caused by natural disasters or other causes.

Goal Outcome Indicator	Unit of Measurement	Quantity
Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15,000

Economic Development Goal

The principal goal is to create and retain permanent, private-sector job opportunities, principally for low- and moderate-income persons, through the expansion and retention of business and industry in Ohio communities. The Microenterprise Program is funded with OHTF funds.

Goal Outcome Indicator	Unit of Measurement	Quantity
Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1,000
Jobs created/retained	Jobs	200
Businesses assisted	Businesses Assisted	7