



Development  
Services Agency

# Fiscal Year 2013 Ohio Consolidated Plan Executive Summary

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**May 2013**

Prepared By:  
Ohio Development Services Agency  
Community Services Division  
Office of Community Development

## **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 (pages 1-2).
- Objectives and outcomes and an evaluation of past performance (pages 13-22)
- Summary of comments on the plan and responses to comments (pages 23-27)

A summary of the proposed revisions for the Draft FY 2013 Ohio Consolidated Plan are on pages 3-11, as well as a budget table that appears on page 12. The amount of HUD funds listed in the budget table are based on the FY 2013 HUD Allocations, and the Ohio Housing Trust Fund allocations are pending Controlling Board approval. Information on the state's past performance includes a listing of each program's goals and objectives, as well as performance measures and performance indicators for each objective. Please note that the 2012 programs will not be fully implemented until June 30, 2013. Therefore, the most current summary data addressing past performance is for the 2011 program year. Much more detailed information about the 2011 programs and activities is available in the Fiscal Year 2011 Consolidated Plan Annual Performance and Evaluation Report, which is required to report on the progress that the state has made in carrying out its Strategic Plan and its Action Plan. The report covers the Community Development Block Grant (CDBG) Program, the HOME Investment Partnerships (HOME) Program, the Emergency Solutions Grant (ESG) Program and the Housing Opportunities for Persons with AIDS (HOPWA) Program. Copies of the FY 2011 Annual Performance Report (APR) may be obtained from the Office of Community Development OCD upon request at (614) 466-2285 or in person at the OCD office, which is located at 77 South High Street, 26<sup>th</sup> floor, Columbus, Ohio 43215. The FY 2011 APR is also available online at [http://development.ohio.gov/cs/cs\\_ocp.htm](http://development.ohio.gov/cs/cs_ocp.htm).

## **FY 2013 Citizen Participation and Consultation Process**

OCD carried out a number of activities designed to obtain comments, perspectives, and opinions from citizens during the preparation of the FY 2013 Ohio Consolidated Plan. Notification of all public hearings and meetings was made at least 10 days in advance of the meetings through direct mail and through the posting on the OCD website. Records of these actions and documentation are available for review during regular business hours at the OCD office, located at 77 South High Street, 26<sup>th</sup> floor, Columbus, Ohio 43215. The specific steps in the citizen participation process are described below in sections 1-4.

### **1. Public Hearing On Needs**

OCD held a public hearing on needs issues on September 13, 2012 in Room 1932 on the 19<sup>th</sup> Floor of the Riffe Center located at 77 South High Street, in Columbus, Ohio.

### **2. Program Advisory Committees**

Meetings were held with nine Program Advisory Committees on October 2 and 3, 2012. Each of the Program Advisory Committees were comprised of at least 10 members, including local officials, program administrators, nonprofit organizations, and other agencies, organizations and individuals familiar with OCD's programs and/or the Housing Development Assistance Program administered by the Ohio Housing Finance Agency (OHFA). OCD solicited participation on the Program Advisory Committees by directly mailing information to approximately 1000 communities, agencies and organizations. The mailing also provided notification about the public hearing on needs.

The following Program Advisory Committee meetings were held:

- Community Development Program Advisory Committee
- Residential Public Infrastructure Grant Program Advisory Committee
- Fair Housing/New Horizons Program Advisory Committee
- Economic Development Program Advisory Committee
- Microenterprise Business Development Program Advisory Committee
- Community Housing Improvement Program Advisory Committee
- Housing Development Assistance Program (HDAP) Advisory Committee
- Homeless Crisis Response Program / Housing Assistance Grant Program Advisory Committee
- Housing Opportunities for Persons With AIDS Program Advisory Committee

### **3. Consolidated Plan Advisory Committee Meeting**

The FY 2013 Ohio Consolidated Plan Advisory Committee will meet on February 12, 2013 to review the Draft FY 2013 Ohio Consolidated Plan. The Ohio Consolidated Plan Advisory Committee is comprised of more than 20 persons who represent a variety of public and private organizations that are involved with programs and issues related to housing and community development.

### **4. Notification of Public Comment Period and Distribution of Plan**

On March 1, 2013, notification will be sent to approximately 1000 communities, agencies and organizations, informing them that the Draft FY 2013 Ohio Consolidated Plan and Executive Summary will be posted on OCD's website at [http://development.ohio.gov/cs/cs\\_ocp.htm](http://development.ohio.gov/cs/cs_ocp.htm) for review and comment. This notification will also announce the beginning of the mandatory 30-day public comment period on the draft plan, which includes a public hearing on March 20, 2012 in Room 1932 on the 19<sup>th</sup> Floor of the Riffe Center located at 77 South High Street in Columbus, Ohio at 1:30 p.m.

### **Submission to HUD**

The final plan document will be submitted to HUD for a 45-day review period on or about May 13, 2013. Notification of the posting and availability of the final FY 2013 Ohio Consolidated Plan will be sent to about 1000 communities, agencies and organizations throughout the state.

# **FISCAL YEAR 2013 OHIO CONSOLIDATED PLAN**

## **Summary of Proposed Revisions**

### **Introduction**

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) from four programs: the Community Development Block Grant (CDBG) Program, the HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant (ESG) Program, 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 FY 2013 Ohio Consolidated Plan are summarized below. Only significant program revisions are listed, not minor revisions, such as application due dates.

### **I. Community Housing Improvement Program (CHIP)**

Proposed program changes that correspond to each category of the CHIP section are listed below:

#### **Grant Ceiling:**

- The grant ceiling has been reduced from \$500,000 to \$400,000, which will allow for approximately 10 additional grants awarded from the previous year.

#### **Eligible Jurisdictions:**

- Both eligible entitlement/non-participating jurisdictions (counties and cities) and non-entitlement cities and counties that are part of a participating jurisdiction consortium with an allocation of more than \$400,000 from HUD per year are eligible for a maximum CHIP award of \$250,000.

#### **Rating Criteria:**

- The application rating criteria under the Needs, Capacity and Performance categories have been adjusted as follows:
  - The total amount of Needs points available will be reduced to 15 points as a result of reducing Planning from 10 to 5 points
  - The total amount of points available for Administrative Capacity will be reduced to 25 points from 30 points.
  - The total amount of points available for Past Performance will be increased to 35 points from 25 points.

### **II. Housing Development Assistance Program (HDAP)**

#### **Funding Requirements for All Gap Financing Awards:**

#### **Eligible/Ineligible Applicants:**

- OHFA reserves the right to evaluate local governmental or quasi-governmental entities to determine whether or not HDAP funds should be awarded, based on the development experience of the entity and the proposed project.

**A. Housing Development Gap Financing (HDGF)**

**Homeownership**

- OHFA reserves the right to limit or remove homeownership as an eligible activity based on the availability of resources or needs within the State.

**B. Housing Credit Gap Financing**

- The following limits will be placed on projects in the 9 percent competitive housing credit round:
  - \$500,000 for eligible CHDO projects, or an amount approved by OHFA based on the needs of the project and/or funding availability.
  - \$350,000 for non-CHDO projects, or an amount approved by OHFA based on the needs of the project and/or funding availability.
  - The following limit will be placed on projects in the 4 percent competitive housing credit round:
  - Up to \$1,000,000, based on the needs of the project and/or funding availability.

**III. Community Housing Development Organization (CHDO) Operating Grant Program**

**Total Funds Available:**

The budget for this competitive program will be set at \$500,000. The maximum grant award is \$50,000 per organization, and the grant award must not exceed 50% of the organization's total operating budget.

In order to strengthen existing CHDOs, an additional \$200,000 with a maximum grant award of \$50,000 will be available for state-certified CHDOs that begin the process of consolidating their organization with another non-profit organization involved in community housing development serving the same service area. The other organization can also be a state-certified CHDO. If the \$200,000 or any portion remains uncommitted after the application deadline, those funds may be reallocated to the FY 2013 HDAP Program.

**IV. Homeless Crisis Response Program**

**Maximum Award Amounts:**

- Shelter Diversion grants will be awarded on a one- or two-year grant period based on a formula allocation.

**Funding Method:**

- Shelter programs are eligible for renewal of 70 percent of their previous grant amount. The remaining 30 percent of the previous grant amount will be made available through a competitive evaluation based on the rating criteria.

**Eligible Activities:**

- Emergency Shelter Operation and Services costs associated with data collection/evaluation, including Homeless Management Information System (HMIS) activity will be an eligible activity.
- Emergency Shelter Operations and Services other costs funds to provide for staff directly associated with shelter maintenance and security has been removed as an eligible activity.

- Shelter Diversion and Rehousing funds may be used for administering the grant during the grant's work completion period, not after the grant award

**Rating Criteria:**

- The number of points attached to the Rating Criteria has been removed.
- Specific performance measures will be detailed in the program application.

**Regional Assessment and Reallocation Option:**

This section has been added to the FY 2013 Ohio Consolidated Plan.

- Based on requests from Regions and partner agencies within, OCD may consider a limited number of Homeless Planning Regions for participation in a regional assessment and reallocation phase-in process. In this process, Homeless Planning Regions and homeless services providers would agree to conduct in-depth assessments of regional resources and service gaps. Based on the results of the regional assessment, participating regions could have the opportunity to recommend reallocation of OCD homeless program funds within the planning region.

OCD will be developing the criteria to be used for such a determination. Participating regions would agree to work closely with OCD in designing and executing the regional assessment. OCD would reserve the right to accept or deny reallocation recommendations.

Regions interested in participating in this option will be required to contact OCD by a date determined and disseminated by OCD.

**Budget Amendments:**

- For purposes of this program, a formal budget amendment is only necessary when a grantee wishes to transfer funds into a restricted budget category (i.e. administration). Budget amendments not relating to funds in restricted categories are exempted from the standard 10 percent or \$5,000 requirement.

## **V. Supportive Housing Program**

**Goal:**

- To provide opportunity for stable, long-term housing for people who are homeless or at risk of homelessness according to federal definition through transitional housing and permanent supportive housing operations.

**Funding Method:**

- Transitional housing and permanent supportive housing programs currently funded by OCD are eligible to apply for funding based on their previous funding level and outcomes.

**Eligible Activities:**

- Data Collection and Evaluation including costs associated with data collection and reporting through the use of Homeless Management Information Systems (HMIS) or a comparable client-level database. Eligible costs include the purchase of HMIS software and/or user licenses; leasing or purchasing needed computer equipment for providers and the central server; costs associated with data collection, entry, and analysis; and staffing associated with the operation of HMIS, including training.

## **VI. Housing Assistance Grant Program**

### **Rating Criteria:**

- Income targeting for Emergency Home Repair/Accessibility Modifications has been increased from 35 percent to 50 percent Area Median Income (AMI).

## **VII. Housing Opportunities for Persons with AIDS Program**

There are no changes being proposed for FY 2013.

## **VIII. Community Development Program**

Proposed program changes that correspond to each category of the Community Development Program section are listed below:

### **Community Development Allocation Grants**

#### **Allocation Calculation Principles:**

- A grant floor of \$75,000 will be set to ensure adequate funding for eligible applications.
- “Direct cities” are cities with a total population of 15,000 or greater and a LMI population of at least 30 percent or greater. Total population was determined based upon the 2010 Census. Direct cities will be awarded and will administer their own grants.
- Counties that include a city that received a direct allocation for the FY 2010, FY 2011, and FY 2012 program years, will be required to undertake at least one project in that city in FY 2013, FY 2014, and FY 2015. The county will also be encouraged to apply for competitive programs on the city’s behalf.

#### **Waiver or Surrender of Funds:**

- Communities must select alternative projects for Community Development Allocation Program funds in the event competitive funds are not secured. Funds are not guaranteed, and delays due to failure to select alternative projects can result in loss of Community Development Allocation Program funds.

#### **Eligible Jurisdictions:**

- Eligible communities must have a population of at least 15,000 and a LMI population of at least 30 percent. This will reduce the total number of eligible communities from 130 in FY 2012 to 104 for FY 2013, with 26 cities no longer receiving a direct CDBG allocation.

#### **Eligible Activities:**

- Community Development Allocation Program funds cannot be used for housing activities, with the exception of Home Repair. OCD has funds set aside for these purposes through its Community Housing Improvement Program (CHIP). In the event a community applies, but is not funded for a CDBG eligible housing activity though the CHIP program in the current or previous years application cycle, OCD will consider a community’s request to waive this requirement and use Community Development Allocation Program funds for other CDBG eligible housing activities. Consideration of a waiver will be based on the competitiveness of the CHIP application along with the community’s demonstrated administrative capacity to administer a housing program. Communities must select

alternative projects for Community Development Allocation Program funds in the event a waiver request is not approved. Waivers are not guaranteed, and delays due to failure to select alternative projects can result in loss of Community Development Allocation Program funds.

**Community Assessment and Strategy:**

- Long-term planning will continue to be a requirement of communities receiving funding through OCD. However, the long-term planning for each community will be comprehensive (i.e., it will cover planning previously addressed separately in the CHIS and the CAS). It is the intention of OCD to simplify this process from its current state. Beginning in 2014, communities applying to OCD for funding will be required to submit a Community Development Strategy (CDS). This will allow the community to take a closer look at their aggregate community development needs, including housing, community development, and economic development.

**Administrative Costs:**

- A maximum of 20 percent (20%) of the total grant will be allowed for general administration, implementation, and Fair Housing costs.

**Fair Housing:**

- If a community chooses not to fund a Fair Housing activity with CDBG funds, the application must identify alternative sources of funds that will be used. These funds must be committed at time of application submission.
- Any Fair Housing activity must include a specific program design with quantifiable, measurable services, and identified beneficiaries. Fair Housing does not count toward the number of allowable projects an applicant may undertake.

**Number of Projects:**

- The maximum number of three projects will be allowed for grantees receiving an allocation funding level of \$75,000 – \$124,900. A total of four projects may be undertaken for grantees that receive an allocation above \$125,000.

**Program Benefit Surveys:**

- Projects determined to be ineligible, due to an incorrect survey methodology will result in forfeiture of Community Development Allocation funds unless the survey can be corrected during the application review period.

**Situations Requiring an Amendment:**

- In general, Amendments will not be allowed for new activities.

**Program Extension:**

- Extensions to the grant agreement may negatively impact a community's Administrative Capacity rating for future application submissions.

**Situations Requiring an Extension:**

- Approval of an extension will be considered on a case-by-case basis. Communities requesting an extension must demonstrate attainment of grant milestones (i.e. Environmental Review Release of Funds, Contract Bidding and Execution, etc.).

**Application Submission:**

- OCD may refuse any applications that are postmarked after the deadline or are incomplete.

**Application Revisions:**

- During the application review process, OCD may require a community to revise its application or supply additional materials before it can be approved. If necessary, communities will be allowed a maximum of 30 days from OCD's initial contact to adequately address the application deficiencies. Community Development Allocation Program funding is not guaranteed; the applicant's administrative capacity, as demonstrated by the timely, complete, and accurate submission of the program application as well as past program performance will be considered when making funding determinations. Failure to demonstrate appropriate administrative capacity is grounds for forfeiture of the community's FY 2013 Community Development allocation. Likewise, submission of an ineligible activity is grounds for immediate forfeiture of a community's allocation.
- Forfeited Community Development Allocation Program funds will be appropriated to the competitive set aside programs.

**Neighborhood Revitalization Grants**

The Neighborhood Revitalization Program has been updated to increase application simplicity and efficiency and enhance the emphasis on impactful projects. The following are major programmatic changes being proposed:

**Local Program Benefit:**

- The program is targeted to distressed communities or areas in Ohio which have a low- and moderate-income (LMI) population of at least 51 percent.

**Administrative Cost:**

- A maximum of 15 percent or \$30,000, whichever is less, of the total grant amount may be used for general administration, environmental review, audit and close-out.

**Neighborhood Facility Inventory:**

- Beginning in FY 2013, OCD will no longer require communities to submit a Community Assessment and Strategy (CAS) update with their Neighborhood Revitalization applications. Communities will be required to complete a Neighborhood Facility Inventory to catalog the existing condition of the public facilities (i.e., streets, sidewalks, community centers, etc.) in the target area and the degree to which the proposed Neighborhood Revitalization program will improve the identified conditions. Exceptions will be made for county applicants applying for a city jurisdiction that received a direct allocation for the FY 2010, FY 2011, and FY 2012 program years.

**75 Percent Expenditure Threshold:**

- Applicants must have expended 75 percent of any previously awarded Neighborhood Revitalization Program grant funds, exclusive of administration, or their FY 2013 program application will not be considered for funding.
- Exceptions will be made for county applicants applying for a city jurisdiction that received a direct allocation for the FY 2012 program year.

**Rating System Principles:**

- The application rating criteria under the Distress and Program Design categories have been adjusted as follows:
  - The total amount of Distress points available will be reduced from 20 points to 15 points.
  - The total amount of points available for Program Design will be increased to 50 points from 45 points.

## **Downtown Revitalization Grants**

The Downtown Revitalization Program will be reinstated in the FY 2013 program year with a stronger focus on project implementation and local impact, rather than long-term planning. The following are the major programmatic changes being proposed:

### **Grant Ceiling:**

- The total grant amount available has been reduced to \$300,000.

### **Eligible Activities:**

- Residential development, non-building related private improvements (e.g. parking facilities, landscaping), and other investments undertaken in the downtown area during the CDBG project period can be counted as leverage. However, CDBG funds cannot be used to pay for these activities.

### **Administrative Cost:**

- A maximum of 15 percent or \$30,000, whichever is less, of the total grant amount may be used for general administration costs. Communities may also use up to 10 percent of the CDBG hard cost per unit for soft costs.

### **75 Percent Expenditure Threshold:**

- Applicants must have expended 75 percent of any previously awarded Downtown Revitalization Program grant funds, exclusive of administration, or their FY 2013 program application will not be considered for funding.

### **Program Rating System Principles:**

All applications will be rated according to the following criteria:

- Distress will have a maximum of 10 points available.
- Leverage will have a maximum of 20 points available.
- Program Design will have a maximum of 50 points available.
- Organization Participation/Capacity will have a maximum of 20 points available.

## **Critical Infrastructure Grants**

The Critical Infrastructure Program was created to assist communities with funding for high-priority, single-component, projects, such as roads, flood and drainage, and other public infrastructure projects with high community-wide impact.

### **Grant Ceiling:**

- The total grant amount available has been reduced to \$300,000.

**Eligible Activities:**

- Eligible activities include construction, reconstruction or rehabilitation of infrastructure components. Eligible infrastructure components include streets and bridges; sidewalks; flood and drainage; water and sanitary sewer. Projects selected for funding must have a high community-wide impact.
- Water and Sanitary Sewer Infrastructure projects determined to be ineligible for the Residential Public Infrastructure Program may be eligible under the Critical Infrastructure Program. Applicants pursuing water and sewer infrastructure projects must demonstrate ineligibility for Residential Public Infrastructure Program.

**Local Program Benefit/National Objective:**

- Communities must qualify activities under the HUD State of Ohio Administered CDBG program national objectives of low- and moderate-income (LMI) area-wide benefit or the prevention/elimination of slum or blight.
- Communities qualifying a project under the “elimination of slums or blight” national objective are required to submit either a statement signed by the applicant community’s Chief Executive Officer (CEO) or a resolution passed by the governing legislative body, which declares the area slum or blighted and/or deteriorated or deteriorating, based upon state or local law.

**Administration:**

- A maximum of 10 percent or \$20,000, whichever is less, of the total grant amount.

**Rating System Principles:**

All applications will be rated according to the following criteria:

- Distress will have a maximum of 25 points available.
- Leverage will have a maximum of 25 points available.
- Program Design/Sustainability will have a maximum of 50 points available.

**IX. Economic Development Loan and Infrastructure Grant Program**

Proposed program changes that correspond to each category of the Economic Development Loan and Infrastructure Grant Program section are listed below:

**Economic Development Loan Program**

No major programmatic changes are anticipated in FY 2013.

**Economic Development Public Infrastructure Grant Program**

No major programmatic changes are anticipated in FY 2013.

**Residential Public Infrastructure Grant Program**

**Grant Ceiling:**

- The maximum award for public infrastructure has been reduced from \$600,000 to \$500,000, with the possibility of an additional \$100,000 requested for on-site improvements.

**Administrative Cost:**

- The maximum amount of administration has been increased to 10 percent or \$20,000, whichever is less.

**X. Community Development Corporation (CDC) Microenterprise Business Development Program**

**Goal:**

- Beginning in SFY 2014 the administration of the CDC Microenterprise Business Development Program will be transitioned out of the Office of Community Development.

**XI. Discretionary Grant Programs**

There are no changes being proposed for FY 2013

**XII. New Horizons Fair Housing Assistance Program**

There are no changes being proposed for FY 2013

**Table 1: FY 2013 Ohio Consolidated Plan Program Summary**

Programs	Federal And State Funds Total	Pct. of Total	Consolidated Plan Total <sup>(1)</sup>	Pct. of Total	Funding Sources				
					1	2	3	4	5
					Federal CDBG	Federal HOME	Federal ESG	Federal HOPWA	State OHTF <sup>(2)</sup>
Community Housing Improvement Program	\$ 20,447,700	17.4%	\$ 19,447,700	30.2%	\$ 9,000,000	\$ 10,447,700			\$ 1,000,000
Housing Development Assistance Program <sup>(2)</sup>	\$ 21,800,000	18.6%	\$ 3,800,000	5.9%		\$ 3,800,000			\$ 18,000,000
CHDO Competitive Operating Grant Program	\$ 700,000	0.6%	\$ 700,000	1.1%		\$ 700,000			
<b>Affordable Housing Subtotal</b>	<b>\$ 42,947,700</b>	<b>36.6%</b>	<b>\$ 23,947,700</b>	<b>37.2%</b>	<b>\$ 9,000,000</b>	<b>\$ 14,947,700</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 19,000,000</b>
Homeless Crisis Response Grant Program <sup>(3)</sup>	\$ 19,634,700	16.7%	\$ 4,124,700	6.4%			\$ 4,124,700		\$ 15,510,000
Supportive Housing Grant Program	\$ 6,700,000	5.7%	\$ -	0.0%					\$ 6,700,000
Housing Assistance Grant Program	\$ 5,300,000	4.5%	\$ -	0.0%					\$ 5,300,000
Housing Opportunities for Persons With AIDS	\$ 932,797	0.8%	\$ 932,797	1.5%				\$ 932,797	
<b>Homelessness &amp; Supportive Housing Subtotal</b>	<b>\$ 32,567,497</b>	<b>27.8%</b>	<b>\$ 5,057,497</b>	<b>7.9%</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 4,124,700</b>	<b>\$ 932,797</b>	<b>\$ 27,510,000</b>
Community Development Program <sup>(4)</sup>	\$ 20,200,000	17.2%	\$ 20,200,000	31.4%	\$ 20,200,000				
Economic Dev. & Public Infrastructure Program <sup>(5)</sup>	\$ 10,800,000	9.2%	\$ 10,800,000	16.8%	\$ 10,800,000				
Microenterprise Business Development Program	\$ 635,000	0.5%	\$ -	0.0%	\$ -				\$ 635,000
<b>Community &amp; Economic Development Subtotal</b>	<b>\$ 31,635,000</b>	<b>27.0%</b>	<b>\$ 31,000,000</b>	<b>48.2%</b>	<b>\$ 31,000,000</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 635,000</b>
Discretionary Grant Program	\$ 1,890,000	1.6%	\$ 1,000,000	1.6%	\$ 900,000	\$ -	\$ 100,000		\$ 890,000
New Horizons Fair Housing Assistance Program	\$ 50,000	0.0%	\$ 50,000	0.1%	\$ 50,000				
Training and Technical Assistance Funds	\$ 488,400	0.4%	\$ 323,400	0.5%	\$ 323,400				\$ 165,000
Community Development Finance Fund	\$ 1,850,000	1.6%	\$ -	0.0%					\$ 1,850,000
Resident Services Coordinator Program	\$ 315,000	0.3%	\$ -	0.0%					\$ 315,000
Administration <sup>(6)</sup>	\$ 5,582,575	4.8%	\$ 2,947,575	4.6%	\$ 944,284	\$ 1,660,816	\$ 342,475	\$ -	\$ 2,635,000
<b>Totals =</b>	<b>\$ 117,326,172</b>	<b>100%</b>	<b>\$ 64,326,172</b>	<b>100%</b>	<b>\$ 42,217,684</b>	<b>\$ 16,608,516</b>	<b>\$ 4,567,175</b>	<b>\$ 932,797</b>	<b>\$ 53,000,000</b>

- (1) The "Consolidated Plan Total" column includes the CDBG, HOME, ESG and HOPWA funds awarded to the State of Ohio.
- (2) OHTF allocations are contingent upon approval by the OHTF Advisory Committee and the Director of the Development Services Agency. Further, OHTF grant awards are contingent upon Controlling Board approval. OHFA administers the HDAP, ODA will administer the Resident Services Coordinator Program and Ohio CDC will administer the Microenterprise Business Development Program. Therefore, in addition to program funds, OHFA will receive HOME and OHTF administrative dollars and ODA and Ohio CDC will receive OHTF administrative dollars.
- (3) The Homeless Crisis Response Grant Program includes the OHTF funding set asides required by ORC Section 174.02 and unrestricted OHTF dollars.
- (4) The Community Development Program includes the funding allocation for the Formula Allocation and three competitive set asides; Neighborhood Revitalization Grants, Downtown Revitalization Grants, and Critical Infrastructure grants (Approximately 40% of the Community Development Program will be allocated for these competitive awards).
- (5) The Economic Development and Public Infrastructure Program includes Small Business Loans, Off-Site Infrastructure, and Residential Water & Sewer projects that were previously funded in separate programs.
- (6) Approximately 60% of the HOME and 80% of the ESG administration allocation will be awarded to grant recipients.

## **Program Goals, Objectives, Performance Measures and Indicators**

This section provides information on performance measures that were developed as part of the FY 2010 Ohio Consolidated Plan and 2010-2014 Ohio Consolidated Plan Strategy. Note that 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, OCD 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 federal HUD 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.

**Housing - Community Housing Programs  
Performance Measures Report**

**Program Year 2011**

**Goal: To provide funding for a flexible, community-wide approach to the improvement and provision of affordable housing for low- and moderate-income persons, and to help develop local administrative capacity.**

Objectives	Performance Measures	
<b>Objective 1:</b> Preserve affordable owner and renter housing for lower-income households by bringing the housing unit up to program standards and codes, eliminating hazards and deficiencies in major systems, and reducing maintenance cost.	Owner units brought to standard	426
	Renter units brought to standard	30
	Households unable to be assisted	not currently available
<b>Objective 2:</b> Eliminate lead-based paint hazards through the application of interim control measures based on a risk assessment followed by a clearance examination.	Units made lead-safe and passed clearance test	456
<b>Objective 3:</b> Improve affordability by reducing housing operating costs through energy efficiency improvements.	Units made more energy efficient	not currently available
<b>Objective 4:</b> Improve accessibility to housing persons with disabilities by making modifications to dwelling units.	Units modified to improve accessibility for disabled persons	not currently available
<b>Objective 5:</b> Expand housing opportunities for LMI households, by providing assistance that will enable them to acquire appropriate affordable housing that meets program and local standards.	New affordable units added to the housing stock	29
	Homebuyers Assisted	64
	Family Households of 3 or more persons assisted to acquire units with 3 or more bedrooms	33
	Large Family Households of 5 or more persons assisted to acquire units with 4 or more bedrooms	3
	Number of affordable unit years created	not currently available
	Renters assisted with rental assistance payments	238
	Households not assisted due to credit problems or other issues	not currently available
<b>Objective 6:</b> Prevent homelessness and address immediate threats to health and safety caused by emergency housing issues, such as roof, plumbing, heating or electrical systems, or need for temporary housing assistance payments.	Households assisted with temporary housing payments Units Repaired for Immediate Health/Safety Threats	572
<b>Objective 7:</b> Provide supportive housing counseling services to assist lower-income households with acquiring or maintaining housing.	Persons or Families given housing counseling	251

**Housing - Housing Development  
Performance Measures Report**

**Program Year 2011**

**Goal:** The goal of the Ohio Department of Development's Ohio Housing Finance Agency's (OHFA) Housing Development Assistance Program (HDAP) is to support the capacity of housing development organizations and to provide financing for eligible housing projects to expand the supply of decent, safe, affordable housing for very low-income to moderate-income persons and households in the state of Ohio.

Objectives	Performance Measures	
<b>Objective 1:</b> Expand affordable rental housing opportunities for lower-income persons and families in Ohio by using HOME funds to provide gap financing in conjunction with other funding sources, including Ohio Housing Credits, to fund approximately 30 projects and create about 1,200 units of affordable rental housing units annually.	Number Affordable Units Created	495
	Number of Affordable Housing Projects Assisted	12
<b>Objective 2:</b> Create long-term affordable housing opportunities for residents of rental housing.	Number of unit-years of affordable housing created:	14,850
<b>Objective 3:</b> Expand rental opportunities for very low-income households by targeting families earning at or below 35% AMGI.	Number of households at or below 35% of area median income to benefit from affordable, HOME-assisted housing	38
<b>Objective 4:</b> Establish linkages between projects and local supportive services agencies.	Number of projects that will better serve residents through linkages with support service agencies	6
<b>Objective 5:</b> Reduce housing costs by 10% for lower-income families by encouraging energy-efficient units that also provide universal design features.	Number of lower-income households that will experience reduced housing costs of 10% or more through energy-saving / universal design features	495
<b>Objective 6:</b> Encourage the development of housing that serves households with MR/DD, Severe and Persistent Mental Illness or Mobility/Sensory Impairments.	Number of households with special needs that will be served by affordable housing units assisted with HOME funds	22
<b>Objective 7:</b> Encourage energy-efficient units that also provide universal design features.	Number of households that will benefit from HOME-assisted units that incorporate universal design and/or energy efficient features	495
<b>Objective 8:</b> Continue to review and refine the application process, minimizing barriers to accessing the program.	Number of comments received from advisory groups meetings	0
<b>Objective 9:</b> Use housing resources to improve the quality of living for low- to moderate-income households and provide housing for residents of Ohio with special needs.	Number of low- or moderate-income households that will benefit from HOME-assisted projects with community service linkages, energy saving or universal design features and/or that serve special needs households	495

**Housing - Community Housing  
Development Organizations  
Performance Measures Report**

**Program Year 2011**

**Goal: To provide limited operating support to organizations to continue affordable housing development and to provide capacity building opportunities to new organizations.**

Objectives	Performance Measures	
<b>Objective 1:</b> Offer continued support for eligible, existing grantees that meet agreed upon benchmarks and milestones in the production of affordable housing.	Total CHDO's	20
	CHDO's meeting benchmarks and goals	20
	Number of affordable projects produced by CHDO's	4
	Number of affordable units produced by CHDO's	184
<b>Objective 2:</b> Expand the program to include Sustaining Grants to CHDO's with service areas located in City/County Participating Jurisdictions.	Number of PJ CHDO's meeting production goals	10
	Percent of PJ CHDO's meeting production goals	100%
	Number of projects produced by PJ CHDO's	3
	Number of units produced by PJ CHDO's	40
<b>Objective 3:</b> Offer Capacity Building Grants to CHDO's new to the program.	Number of new non-PJ CHDO's meeting goals	N/A
	Projects by new non-PJ CHDO's	N/A
	Units by new non-PJ CHDO's	N/A

**Community Development  
Performance Indicator Report**

**Program Year 2011**

**Goal: To provide communities with a flexible housing and community development resource that can be used to address locally identified needs that are eligible CDBG activities and qualify under the national objective of Low- and Moderate-Income benefit or Elimination of Slum and Blight.**

Objectives	Performance Measures	
<b>Objective 1:</b> Assist Ohio cities and counties with addressing local community development needs by making grant awards to 79 counties and 49 cities in Ohio.	Total funds distributed to local communities	\$26,560,812
	Total number of activities funded (excludes administration)	593
	Number of people benefiting from funded activities	7,850,313
<b>Objective 2:</b> Revitalize neighborhoods and improve the quality of life for residents, by addressing all or part of the identified community development needs and/or by addressing all or part of the identified community development needs and/or housing needs in 100 areas annually	Number of Investment Areas Impacted by CDBG revitalization activities	not reported
	CDBG-funded improvements that address identified needs in local Investment Areas	316
	Persons benefiting from CDBG activities in Investment Areas	657,815
	Low- and moderate-income persons benefiting from CDBG-funded Investment area activities	380,602
	Total CDBG Funds in Activities in Investment Areas	\$13,022,927
	Other Funds	\$19,399,038
<b>Objective 3:</b> Address basic health and safety issues by constructing and or upgrading basic water and sanitary sewer infrastructure to comply with standards established by the EPA	Communities assisted with new or upgraded water or sanitary sewer systems that comply with EPA	20
<b>Objective 4:</b> Address basic health and safety needs of low-moderate income persons, neighborhoods and communities.	Number of communities assisted with fire protection equipment	30
	Number of persons in communities benefiting from improved fire protection equipment or facilities	69,953
	Number of low or moderate-income persons benefiting from improved fire equipment or facilities	45,630

**Community Development  
Performance Indicator Report**

**Program Year 2011**

Objectives	Performance Measures	
<b>Objective 5:</b> Improve the quality of life for elderly persons and special needs populations by providing locally determined public services and facilities	Persons assisted by public services by type of service provided	
	Services for Disabled Persons	28,660
	Services for Elderly Persons	17,643
	Medical and Nutrition Programs	120
	Homeless and D.V. Services	184
	Other Types of Services	97
<b>Objective 6:</b> Improve the quality of life for elderly persons and special needs populations by providing locally determined public services and facilities	Number of Senior Center improved or constructed	8
	Number of elderly persons benefiting from construction or improvements to senior centers	8
<b>Objective 7:</b> Maintain the cultural heritage of local communities through Historic Preservation activities	Local Historic Structures Preserved	8

**Economic Development Performance  
Measures Report**

**Program Year 2011**

**Goal: The principal goal of the Economic Development Program 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.**

Objectives	Performance Measures	
<b>Objective 1:</b> Create/retain 750 jobs and at least 400 jobs for LMI persons.	Number of communities provided with economic development grant assistance	12
	Number of people whose jobs were created or retained as a result of CDBG-assisted economic development projects	560
	Number of jobs created/retained for low- or moderate-income persons	363
<b>Objective 2:</b> Provide CDBG assistance such that the average total cost per job created/retained is \$10,000 or less.	Average annual CDBG cost per job	\$6,569
<b>Objective 3:</b> Maximize participation of other resources such that projects leverage at least \$10 of other funds for \$1 CDBG funds (\$10 : \$1 leverage ratio)	Annual leverage ratio (other funds : CDBG funds)	\$22 : \$1
<b>Objective 4:</b> Improve the economic health and sustainability of local communities by adding to the tax base and local economy through expansion or retention of the existing businesses.	(a.) Annual local income tax revenue	\$263,204
	(b.) Annual local corporate tax revenue	\$5,100
	(c.) Annual property tax revenue	\$6,629,698
	Total (a-c) Additional local tax revenues generated annually	\$6,898,002
	Projected additional dollars expended in the local economy annually	\$14,872,000
<b>Objective 5:</b> Increase the number of high-value business and jobs (high-technology/manufacturing) in local communities.	High-value businesses created, expanded or retained	8

**Economic Development Performance  
Measures Report**

**Program Year 2011**

Objectives	Performance Measures	
<b>Objective 6:</b> Provide training and financial support to prospective business owners to facilitate the creation of new businesses.	New businesses created	1
<b>Objective 7:</b> Support the revitalization and rejuvenation of neighborhoods and communities, particularly areas with economic needs, through investment in new or existing businesses.	Number of businesses located in ODOD-designated distressed area	9
	Number of businesses located in locally-designated Enterprise Zone	not currently collected
	Number of businesses located in Central business district revitalization area	2
	Number of businesses located in Low-income neighborhood or community	12
<b>Objective 8:</b> Support the creation and retention of business providing “living wage” jobs.	Number and percent of jobs that are created or retained that exceed 150% of the poverty level	560 100%
	Number and percent of jobs created or retained that provide employee health benefits	510 91%

**Downtown Revitalization Program  
Performance Measures Report**

**Program Year 2011**

**Goal:** The principal goals of the Comprehensive Downtown Revitalization Program are: (1) to assist in the revitalization of Central Business Districts; (2) to aid in the elimination of slums and blight; and (3) to create and retain permanent, private-sector job opportunities, principally for persons from low- and moderate-income households.

Objectives	Performance Measures	
<b>Objective 1:</b> Provide assistance to communities to revitalize Central Business Districts	Number of Central Business Districts Assisted	5
<b>Objective 2:</b> Eliminate blighting conditions by rehabilitating buildings and facades located in areas that have been designated as distressed based on HUD criteria.	Number of buildings rehabilitated	74
	Percent of buildings rehabilitated	not collected
<b>Objective 3:</b> Eliminate blighting conditions by upgrading infrastructure in the designated downtown revitalization areas.	Streets improved or reconstructed (linear feet)	2,640
	Sidewalks improved or reconstructed (linear feet)	800
	Items installed as part of streetscaping (utility lines/poles, street lighting, benches, etc.)	28
	Parking Spaces constructed:	not collected
<b>Objective 4:</b> Leverage private and public funds for building and infrastructure improvements in the downtown revitalization area:	Other funds leveraged	\$9,347,827

**Homeless Performance  
Measures Report**

**Program Year**

**2011**

**Goal: To provide a continuum of housing/services to prevent persons from becoming homeless by providing homelessness prevention services and assistance; move persons from homelessness to permanent housing through the provision of emergency shelter, direct housing, and transitional housing; and provide long-term permanent supportive housing to homeless persons with disabilities. Funding is provided to eligible non-profit organizations, units of local government, public housing authorities and consortia of any eligible applicants for homeless prevention, emergency shelter, transitional housing, direct housing, and permanent supportive housing that meet the housing needs of homeless and low-income families and individuals.**

<b>Performance Measures</b>	
Number of homeless shelters assisted	94
Number HH/Persons assisted with temporary shelter:	HH= 25,660 Persons= 36,813
Reduction of average length of stay:	Did not collect
Number of Families achieving a positive outcome:	27248
Percent of Families achieving a positive outcome:	90%
No Families moved to permanent housing:	Did not collect
Percent of families moved to permanent housing:	Did not collect
Number of families residing in permanent housing after 7 months:	Did not collect
Percent of families residing in permanent housing after 7 months:	Did not collect
Number of families moved to permanent supportive housing:	Did not collect
Percent of families moved to permanent supportive housing:	Did not collect
Number of families residing in perm supp housing after 7 months:	775
Percent of families residing in perm supp housing after 7 months:	76%

## Responses to Comments on the Draft FY 2013 Ohio Consolidated Plan

The Office of Community Development will hold the 30-day public comment period beginning on March 1, 2013, along with a Public Hearing that is scheduled for March 20, 2013 in the Riffe Center on the 19<sup>th</sup> Floor. All comments received along with the corresponding responses prepared by the Office of Community Development (OCD) and the Ohio Housing Finance Agency (OHFA) concerning the Draft FY 2013 Ohio Consolidated Plan will be included in this section.

1. **Comment:**

I commend the ODSA for recognizing the importance and value of amortized housing development loans and the generation of program, as well as, recognizing the importance of evaluating the need for development subsidy on a case-by-case basis.

**Response:**

Thank you very much.

2. **Comment:**

Greater flexibility should be given to the Ohio Housing Finance Agency (OHFA) to allow for the consolidation eligibility of a state-certified CHDO with a non-profit housing organization (non-CHDO). Expanding the eligibility would also satisfy the intent of building stronger and more sustainable CHDO's. The current draft plan language calls for the CHDO Operating Funding Committee to defer the decision to FY 2014. If this committee approves of CHDO to non-CHDO eligible we request that the eligibility be changed in the FY 2013 Con Plan and not deferred to FY 2014.

**Response:**

CHDO Operating Grant Advisory Committee met on April 4. Changes to the Consolidated Plan language came out to at that meeting which reflects the desire to allow CHDO's to merge with other non-profits, and for this to take place in FY 13.

3. **Comment:**

Access to "preference points" has been requested under the Low Income Housing Tax Credit program, where there are requirements for developers to seek input into local planning efforts by the county DD Boards.

**Response:**

Not much flexibility in the upcoming 2014 QAP to make changes (second year of a two year plan) but will include representatives of the DD community in the discussion groups for the 2014 and the 2015 plan.

4. **Comment:**

Pledge to work with any and all federally funded capital housing resources (NSP, HOME Partnerships, CDBG, CHIP, HUD 811, Rural Housing, etc.) to incorporate the application of citizens with disabilities in their planning process.

**Response:**

As this is a new outreach for the DD community, OHFA will welcome them to participate in the 2014 and the 2015 QAP planning process.

5. **Comment:**

Pledge the continuing expansion and use of "visitability" (accessible) standards in all new developments and insure that units developed to meet this standard are committed to be used by those in need.

**Response:**

The Ohio DD Council should discuss this topic during the 2014 and 2015 QAP planning process.

**6. Comment:**

The comment recommends that counties which include a city (or cities) that received a direct allocation in FY 2012 may increase their total number of projects by one project for each city.

**Response:**

The number of projects permitted in FY 2013 is based on the amount of the allocation and not the number of communities eligible for funding. The intent is that communities will allocate significant resources to each project rather than spreading limited funding across multiple jurisdictions. Additional projects are allowed for communities successful in applying for the competitive set-aside funds as increased resources are provided for additional projects.

**7. Comment:**

Removal of the Critical Infrastructure Grant Program due to limited federal funding.

**Response:**

The Critical Infrastructure Program was designed to supplement public facilities funding with the reduction in funds made available to the Allocation Program. The Critical Infrastructure is designed to provide communities with an additional resource for critical public facilities projects that they can no longer fund with the Allocation Program.

**8. Comment:**

Communities may apply for any combination of Neighborhood Revitalization Program, Downtown Revitalization Program and Critical Infrastructure Program competitive set-aside grants.

**Response:**

For FY 2013, counties are allowed to apply for two Neighborhood Revitalization and/or Downtown Revitalization grants and one Critical Infrastructure grant. Cities are allowed to apply for either Neighborhood Revitalization or Downtown Revitalization funding and Critical Infrastructure. This combination will be reviewed again for the FY 2014 program year.

**9. Comment:**

Any city that no longer meets the direct city criteria, that city should not be guaranteed a project by its county under the Community Development Allocation Grants Program.

**Response:**

The FY 2010, FY 2011, and FY 2012 Direct Cities that no longer qualify for Direct funding in FY 2013 will be allowed one project from the county of jurisdiction for a three year transitional period. Starting in FY 2016, there will no longer be a requirement that the former Direct Cities receive funding.

**10. Comment:**

Any community that wishes to undertake housing activities should be permitted to do so under the Community Development Allocation Grants Program.

**Response:**

Communities will be permitted to use funds for Home Repair activities and can request waivers to fund other CDBG-eligible housing activities with the submission of a competitive yet not funded FY 2012 or FY 2013 CHIP application.

**11. Comment:**

Remove the "Revolving Loan Fund Participation" requirement.

**Response:**

Communities are not permitted to retain high or stagnant program income balances. OCD will continue to require communities to substantially disburse any program income prior to or in conjunction with the submission of an application for CDBG program funds.

**12. Comment:**  
Define the terms “substantially disburse,” “any Revolving Loan Fund balance”, and “specific community development project.”

**Response:**

OCD will not award funds or will reduce the level of new grant funding available to communities with high or stagnant RLF balances unless the community commits RLF funds to the new application or has prior commitments for RLF dollars.

**13. Comment:**  
Remove “Home Repair” activities.

**Response:**

Since CDBG funds allocated to the CHIP are limited, communities will be permitted to continue funding Home Repair activities with Community Development Allocation Program funds. Restrictions have been put in place for the funding of other CDBG-eligible housing activities. Additionally, housing activities are not permitted under any of the competitive set-asides.

**14. Comment:**  
Revise the “Number of Projects” section as such: \$100,000 to \$149,999 – 3 Projects; \$150,000 to \$199,999 – 4 Projects; \$200,000 to \$300,000 – 5 Projects.

**Response:**

3 projects is the maximum number of projects allowable with a Community Development Allocation Program. Communities wishing to undertake additional projects must apply for competitive set-aside funds.

**15. Comment:**  
Under the Local Grant Period change the reference from FY 2012 to FY 2013 regarding grant closeout.

**Response:**

This change has been made.

**16. Comment:**  
Support has been expressed for suggested program improvements, particularly in terms of scoring competitive grants, such that the weight of organizational capacity will ensure a comprehensive approach to revitalization in the selected communities.

**Response:**

Both administrative capacity and the strength of the downtown business and buildings owners association will be factors in the competitive scoring of program applications.

**17. Comment:**  
A recognition of the housing activities required by the State of Ohio under the “Olmstead Act” and subsequent “Olmstead Plan” as well as current efforts underway through “Money Follows The Person”, where housing will play a critical role in establishing appropriate based housing and services.

**Response:**

The FY 2013 Annual Action Plan describes the state of Ohio’s position regarding this matter under the Community-Based Alternatives for Individuals with Disabilities and Preferences for Persons on page 144.

**18. Comment:**  
Engage in active planning in concert with the Ohio DoDD and the Ohio Association of County Boards to address the significant, unmet housing needs of Ohio’s citizens with developmental disabilities.

**Response:**

The state of Ohio encourages the Ohio DoDD, as well as, the Ohio Association of County Boards to participate in the FY 2014 Citizen Participation Plan that is outlined on page 165.

**19. Comment:**

Adjust the Consolidated Plan Advisory Committee to include more private sector representation.

**Response:**

The Ohio Consolidated Plan Advisory Committee (CPAC) is comprised of a number of members representing non-profit organizations, the private and public sector, as well as, local communities. The composition of the CPAC reflects the proportion of OCD and OHFA grantee stakeholders statewide.

**20. Comment:**

Language proposed to indicate that all advisory concerns will require the grantee to respond with a future plan of action for the cited advisory concern.

**Response:**

OCD currently requires that all findings require the grantee to respond and rectify the cited deficiency.

**21. Comment:**

Propose funding for the CHIP be suspended for FY 2013 and reallocate the funding for the Neighborhood Revitalization and Downtown Revitalization Grant Programs.

**Response:**

The Office of Community Development administers the CHIP to provide funding for a flexible, community-wide approach to the improvement and provision of affordable housing for low- and moderate-income persons, and to help develop local administrative capacity. The suspension of this program will not be considered to reallocate funding to non-housing programs. The FY 2013 CHIP application submission deadline of April 5, 2013, has been set and was announced at the January 2013 application training. This date will not be changed.

**22. Comment:**

Adjust the proposed Grant Ceiling of \$400,000 back to the FY 2012 levels of \$500,000.

**Response:**

With the grant ceiling reduced from \$500,000 to \$400,000, approximately 10-12 additional grants will be awarded from the previous year. This reduction is indicative of the budget cuts from all funding sources. The grant ceiling will remain at \$400,000.

**23. Comment:**

Include Acquisition/Rehabilitation/Resale as a primary activity.

**Response:**

Acquisition/Rehabilitation/Resale is a primary activity as shown on page 15 of the draft. A verbal correction was made during the public hearing that the activity was intended to be Acquisition/Rehabilitation/Rental. This activity is available through the Ohio Housing Finance Agency (OHFA). It will not be offered as an activity through CHIP.

**24. Comment:**

Adjust the Application Timing from April 5, 2013 to June 21, 2013 in order for ODSA to make revisions to the draft FY 2013 Consolidated Plan.

**Response:**

This matter should be discussed at the 'Needs Hearing' in September 2013. The FY 2013 CHIP application submission deadline of April 5, 2013, has been set and was announced at the January 2013 application training. This date will not be changed.

**25. Comment:**

Should the Grant Ceiling remain at \$400,000, the Local Program Period should be reduced to match the Community Development Allocation Program of 18 months.

**Response:**

A contracted grant period will do nothing to increase funding and may impose undue burden on some communities. With the exception of Fair Housing programs which must be active throughout the grant period, all other activities may be completed as quickly as a community wishes. The program period will remain as proposed.

**26. Comment:**

The rating should be revised as follows. Planning points be eliminated (currently at 5 points) and Community Distress points be increased from 10 points to 15 points. A community's pre-application planning process should simply be an application threshold versus a rating criterion.

**Response:**

It has been determined that the CHIP application planning process is important in defining a community's greatest housing needs. OCD ensures completion of the process by reviewing it as a part of each community's application for CHIP funding. Regarding the proposed increase in points associated with Distress, need must continue to be weighted with a community's commitment, capacity and ability. The point values will remain at the current levels.

**27. Comment:**

Develop a Basic Housing Program Income Handbook and provide training on new Program Income regulations.

**Response:**

OCD will evaluate the need for the development of new training materials and revisions to existing training materials during the 2013 calendar year and will consider the development of new handbooks and necessary training.

**28. Comment:**

Distribute the Residential Rehabilitation Handbook and provide training.

**Response:**

The Housing Handbook is available online. Grantees may print it at their convenience. Specific questions related to the Handbook may be addressed to OCD at any time. OCD will consider the needs for training related to the Handbook.

**29. Comment:**

The Requested access to increased Tenant Based Rental Assistance (TBRA) payments in non-entitlement, rural areas provided to individuals served by the county DD Boards.

**Response:**

Each unit of local government is responsible for requesting each activity and corresponding budget for that activity. The need for Tenant-Based Rental Assistance should be discussed during each community's Housing Advisory Committee meeting. Activities and funds should be requested in the application accordingly.