



Development
Services Agency

Program Year 2015 Ohio Consolidated Plan Annual Action Plan Executive Summary

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Community Services Division
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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.

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 were made in the PY 2015 Ohio Consolidated Plan Annual Action Plan are summarized below. Only significant program revisions are listed, not minor revisions.

Program Year (PY) 2015 Ohio Consolidated Plan Annual Action Plan Summary of Revisions

I. Community Housing Impact and Preservation Program (CHIP)

The following changes were made for PY 2015.

- In accordance with 24 CFR 92.504(c)(1)(viii), committed housing program income must be disbursed prior to the grantee requesting funds from the State. Also, OCD requires that all uncommitted Housing Program Income balances at the time of application, HOME or CDBG, be committed to projects in the Community Housing Impact and Preservation Program application.
- Clermont County is no longer eligible for Community Housing Impact and Preservation Program CDBG funds due to an increase in population over 200,000. Clermont County will only be eligible for HOME funds.

II. Housing Development Assistance Program

The following changes were made for PY 2015.

- Homeownership projects will no longer be eligible through the use of HOME funds. OHFA is establishing a new homeownership program separate from the Con Plan to fund such projects.
- The funding limits for 9 percent competitive Housing Credit Gap Financing has increased for eligible CHDO projects from \$500,000 to \$750,000, and has been reduced for non-CHDO projects from \$350,000 to \$300,000.

III. Community Housing Development Organization Operating Grant Program

The following changes were made for PY 2015.

- The CHDO operating fund category for merging CHDOs has been eliminated, as this is now a moot point in that only a handful of organizations can qualify as a CHDO.

IV. Homeless Crisis Response Program

The following changes were made for PY 2015.

- The allocation/competitive awards for emergency shelters will remain, but the allocation will be increased from 70% to 85% with additional funds being available competitively. The allocation was increased so that an agency that did not receive competitive funds would not face a devastating decrease of 30% which could jeopardize the ongoing operation of an emergency shelter. This was of special concern among small rural shelters that receive a high percentage of their operating support through this program. This will afford agencies that receive reduced funding the time to correct any programmatic issues without threatening their viability.
- Based upon the release of federal guidelines with regards to the updated HUD ESG reporting measurements, the Office of Community Development will assure performance measures are consistent with federal measures.

Supportive Housing Program

The following changes were made for SFY 2016.

- The priority for permanent supportive housing is projects that meet the housing needs of homeless families and individuals with disabilities using a housing first methodology. HUD and the state continue to emphasize a Housing First model in recognition of best practices that demonstrate that once a person has housing, he/she is able to work on other issues that contributed to his/her homelessness. This model emphasized removal or significant reduction in barriers to entry and elimination of eviction due to programmatic violations (e.g. missed case plan meetings). Persons may still be removed to standard tenant/landlord violations (e.g. nonpayment of rent, destruction of property, etc.).

V. Housing Assistance Grant Program

There were no major changes made for SFY 2016.

VI. Housing Opportunities for Persons with AIDS Program

There were no major changes made for PY 2015.

VII. Community Development Program

The following changes were made for PY 2015.

- The language that limited each local jurisdiction to only having one open award at any given time was removed. OCD determined the requirement was unduly restrictive. Language not allowing prior competitive set-aside grant awards to be used as match for current year applications was maintained.
- Jurisdictions awarded PY 2013 or PY 2014 Downtown Revitalization competitive set-aside program funds may not reapply for PY 2015 Downtown Revitalization funds unless the previous grant has been monitored and significant monitoring issues resolved. Language was required for

PY 2015 to mirror language for the other competitive set-aside programs. OCD must be able to document successful completion of previous competitive set-aside awards to evaluate administrative capacity and fulfill close-out requirements of the U.S. Department of Housing and Urban Development. Language did not exist in the PY 2013 and PY 2014 because there were not any communities that had received prior awards.

- Based upon the Department of Housing and Urban Development release of low- and moderate-income data in June of 2014, grantees will now be expected to utilize the new data source in order to determine eligibility.
- Included as part of the Committing Community Development Allocation Program Funds section, Allocation projects that entail major water or sanitary sewer improvements will be evaluated in a similar fashion to RPIG projects even if RPIG is not an identified funding source. Applicants must submit Ohio EPA Permit to Install or Plan Approval, if applicable and account for new household connections at the time of application.

All project dollars identified at the time of application must be firmly committed by the September 1, 2015 grant award. OCD will not consider an application for a subsequent grant request for another OCD-administered program (e.g. RPIG, Discretionary) after Allocation Program funding has been approved.

- As part of the Community Development Allocation Grants Program communities applying to OCD for funding will be required to submit a Community Development Implementation Strategy (CDIS), which prioritizes local projects and evaluates how CDBG-funded programs may assist with each project. Projects submitted for funding under the Community Development Allocation Grants Program should be included in the long term plan of the county or direct grantee city.
- The Office of Community Development proposes to add fire protection facilities to the list of eligible Critical Infrastructure projects. Based on comments made at the Program Advisory Committee, eligible communities were in favor of expanding eligible activities to include fire protection facilities and other “non-infrastructure” types of public improvements. Infrastructure facilities will continue to be eligible.
- Clermont County is no longer eligible for Community Development Program CDBG funds due to an increase in population over 200,000. Clermont County will only be eligible for HOME funds.

VIII. Economic Development Loan and Public Infrastructure Grant Program

The following changes were made for PY 2015.

- A Letter of Interest is required prior to submission of a full application for the Residential Public Grant Program. The state will review the Letter of Interest and notify the applicant if a full application will be accepted. OCD must set up communities in the OCEAN system to allow the submission of applications for PY 2015. The Letter of Interest will allow OCD to screen projects for eligibility prior to commencement of the application process. Communities invited to submit an application will be set up in the OCEAN-system for on-line submission.
- The long term sustainability of the system will be evaluated as a Residential Public Grant Program threshold based on the rate structure and demographics of the user population. The application will also be rated based upon these criteria. With the collection of income data via the American Community Survey (as opposed to the U.S. Census), median household income data now has a large margin of error and is no longer considered to be a reliable source on which user fees should be calculated as a percentage. This change sets a minimum dollar threshold for user fees. Sustainability is also now a scoring consideration as CDBG-funded projects must be able to

operate long-term without an additional influx of program dollars.

- Clermont County is no longer eligible for Economic Development and Public Infrastructure Grant Program CDBG funds due to an increase in population over 200,000. Clermont County will only be eligible for HOME funds.

IX. Target of Opportunity Grant Programs

The following changes were made for PY 2015.

- The Housing Target of Opportunity Program that provided investment in housing projects, special projects and demonstration programs has been eliminated due to the uncertainty of HOME funds, as well as, the ability to fund special housing projects through the other established CDBG and HOME programs.
- Ohio Housing Trust Fund Target of Opportunity Grants will now require projects or activities must be supported by statewide or regional organizations that serve multiple counties, or provide statewide services.

X. New Horizons Fair Housing Assistance Program

There were no major changes made for PY 2015.