Ohio | Development Services Agency

Program Year 2016
Ohio Consolidated Plan
Annual Action Plan
Executive Summary

June 2016

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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 (pages 1-2).
- A summary of proposed revisions (pages 3-10)
- Objectives and outcomes and an evaluation of past performance (pages 12-13)
- Summary of Comments received (page 13)

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 PY 2016 Ohio Consolidated Plan Annual Action Plan are summarized below. Only significant program revisions are listed, not minor revisions.

PY 2016 Citizen Participation and Consultation Process

OCD completed a number of activities designed to obtain comments, perspectives, and citizen opinions to prepare the PY 2016 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 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. Public Hearing On Needs

OCD held a public hearing on needs issues on September 9, 2015, in Room 1960 on the 19th Floor of the Riffe Center, in Columbus. OCD mailed Notification of the Public Hearing on Needs information to approximately 1,000 local communities, organizations and agencies throughout the state at least 30 days in advance. DSA also published the notification on 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. OCD accepted written comments on needs issues for 15 days prior to the meeting (from September 1, 2015 to September 16, 2015). Comments made at the Public Hearing on Needs, or received by OCD prior to the conclusion of the hearing, were distributed to the advisory committee members for consideration during the planning process.

2. Program Advisory Committees

OCD held eight Program Advisory Committees on September 29 and 30, 2015. 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 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 all local communities, organizations and persons on the OCD mailing list, which includes approximately 900 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 Advisory Committee
- Residential Public Infrastructure Grant Program Advisory Committee
- Fair Housing/New Horizons Program Advisory Committee
- Economic Development Program Advisory Committee
- Community Housing Impact and Preservation 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 PY 2016 Ohio Consolidated Plan Advisory Committee met on February 2, 2016, to review the Draft PY 2016 Ohio Consolidated Plan Annual Action Plan. The Ohio Consolidated Plan Annual Action Plan Advisory Committee is comprised of 21 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, 2016, OCD sent notification to approximately 900 communities, agencies and organizations, informing them that the Draft PY 2016 Ohio Consolidated Plan Annual Action Plan and Executive Summary are available on 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 17, 2016, at 1:30 p.m. at 77 South High Street, Room 1960, Columbus, Ohio. All comments received have been included in the PY 2016 Ohio Annual Action Plan.

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 on or before May 13, 2016. Posting notification and availability of the final PY 2016 Ohio Consolidated Plan Annual Action Plan will be sent to approximately 1,000 communities, agencies and organizations throughout the state.

Program Year (PY) 2016 Ohio Consolidated Plan Annual Action Plan
Summary of Proposed Revisions

I. Community Housing Impact and Preservation Program (CHIP)

The following changes are being proposed for PY 2016.

Eligible Jurisdictions

- Having an approved Community Housing Improvement Strategy is longer a requirement for funding
- Cities must have an LMI percentage above 25% to be eligible for funding
- The list of jurisdictions that are eligible for funding has been updated based on a review of total population and percentage of LMI. Below are the communities that have been added or removed:

Jurisdictions Added to the List of CDBG, HOME and OHTF Eligible Communities

Bellevue	Heath	Orrville	Wapakoneta
Celina	Huron	Richland County	Wauseon
Chardon	Ironton	Rittman	Willard
Clyde	Lawrence County	Rossford	
Columbiana	Marion County	St. Marys	
Delphos	Maumee	Tipp City	
Findlay	New Carlisle	Troy	

Jurisdiction Added to the List of HOME Eligible Communities

Bowling Green

Jurisdiction Added to the List of HOME Eligible Communities

Hubbard

Jurisdictions Removed from the list of Eligible Communities

Aurora
Cortland
North Ridgeville
St. Clairsville

Partnership Composition

- Any eligible jurisdiction that chooses not to be a direct CHIP Program participant, either as an applicant or a partner, may do so with no effect on the applicant's scoring or funding level by selecting one of the following options:

  - County Umbrella Option: If an eligible city is not interested in being a partner but is interested in CHIP Program funds being spent in their jurisdiction, the city can join the service area through their county's jurisdiction. The application for funding must contain a letter from the city's CEO electing for CHIP Program funds to be spent in their community under their county's jurisdiction in order to receive points associated with partnership development. When determining the applicant's ceiling amount, the county's amount must be based on amounts outlined for counties under "Single-Community Applicants, Column B or Partnership Applicants" depending on whether the county has another partnering jurisdiction. There are no incentive funds available for this option. The County may participate as a single applicant, a partnership applicant or a partner.

  - Jurisdiction Opt-Out Option: If an eligible jurisdiction has no intention to apply for CHIP Program funding and is not interested in CHIP Program services within its jurisdiction, the application for funding must contain an opt-out letter from the jurisdiction's CEO in order to

receive points associated with partnership development. The opt-out period must be for at least two years and must be stated in the opt-out letter. Such applicants must refer to "Single-Community Applicants, Column B". This is an option only available to jurisdictions that are not interested in the CHIP Program at all and do not want funds spent in their jurisdiction, not for jurisdictions that choose not to partner.

- Non-entitlement cities and counties that are part of a participating jurisdiction consortium and entitlement/non-participating jurisdictions may choose to apply as single-community applicants. Language previously required that they apply as single community applicants. These jurisdictions will automatically receive points associated with partnership development through application scoring or join an eligible partnership with the following restrictions:

  - A non-entitlement/non-participating jurisdiction (see #1, "Eligible Jurisdictions") must be the applicant,
  - When determining the partnership ceiling amount, the amount for non-entitlement jurisdictions that are part of a participating jurisdiction consortium and entitlement/non-participating jurisdictions (see #2 and #3, "Eligible Jurisdictions") must be based on the amounts outlined in "Eligible Jurisdictions",
  - No HOME funds can be spent in non-entitlement jurisdictions that are part of a participating jurisdiction consortium and no CDBG funds can be spent in the entitlement/non-participating jurisdictions.

Tenant-Based Rental Assistance

- Families or individuals provided with HOME Tenant-Based Rental Assistance must be below **60 percent** of the area median income. This has been changed from 50 percent.

CHIP Program Amendment/Extension Policy

The CHIP Program Amendment Policy has been updated to include the following changes:

- Grantees increasing or decreasing a previously approved **project category** by more than $5,000 or 10 percent, whichever is greater, must request an amendment to an executed grant agreement. These thresholds must be applied to both the **project category** from which the funds are to be decreased and the **project category** to which the funds will be increased. Increases or decreases less than this threshold will be reconciled during the closeout process. **Grantees are prohibited from moving funds into an activity that is not included on the Attachment A of that funding source without an amendment.** The administration cap **cannot** be exceeded. **Activity dollars cannot be moved to administration without an amendment.**
- Requests for amendments to extend the grant period (extensions) will generally be discouraged, and will be considered on a case-by-case basis. Extension requests will only be considered for extreme circumstances to communities without ongoing funding opportunities.
- OCD will issue automatic extensions with penalty if program milestones are not met.
- Requests for amendments to adjust funds between eligible project categories or reduce total grant amount, including administration dollars, will be considered with no penalty to subsequent applications during the No-Fault Amendment Period defined in the program milestones.

II. Housing Development Assistance Program

The following changes are being proposed for PY 2016.

Housing Credit Gap Financing

- The funding limits for the 9 percent competitive housing credit round for eligible CHDO's has been reduced from $750,000 to $600,000.
- For a HOME-funded tax credit development, there is no restriction on the development location, which had previously specified that the project be located in a non PJ area.
- HDAP funds may now be applied in the development budget toward non-related party acquisition.
- Language in the Award Process section had been updated to state that "OHFA reserves the right to prioritize permanent supportive housing developments; developments located in HUD Non-

Participating Jurisdictions; projects that have not previously received an award of HDAP funds; developments seeking Section 811 PRA assistance, Medicaid 18% rental subsidy or additional extremely low-income units at or below 30% AMI; and developments in which at least 25% of the total affordable units are three or more bedroom units."

III. CHDO Operating Grant Program

The following changes are being proposed for PY 2016.

Total Funds Available

- The total amount available is $200,000.
- Language in the Total Funds Available section was updated to state that the grant award along with any other local HOME operating grants must not exceed 50 percent of the organizations total operating budget.

IV. Homeless Crisis Response Program

The following changes are being proposed for PY 2016:

Goal

The goal of the program has been updated to specify the activities that are to be undertaken in the entitlement and rural areas of the state. The following language has been added:

- Housing stability funds are expected to be used for only rapid re-housing activities in the entitlement areas of the state. While the rural areas (balance of state) may use funds for homelessness prevention and rapid re-housing, rapid re-housing is the priority of these funds and should be allocated throughout the homeless planning region based on the need for rapid re-housing assistance. Homelessness prevention funds should be limited for use by persons who are in a doubled-up situation, being forced to leave and facing imminent homelessness.

Rating Criteria

- Proposal Design - The proposal should demonstrate involvement in coordinated entry, effective diversion and the utilization of rapid re-housing funds. The proposal should also demonstrate consistency with program requirements and best practices.

- HMIS/Outcomes - The minimum number of items that must be reported includes the following three items from the previously listed twelve performance measures:
    - Occupancy rates
    - Average length of stay
    - Percentage of leavers exiting to a permanent destination or transitional housing

  In addition, OCD will evaluate the HMIS data quality including, but not limited to null and missing values. HMIS data quality was previously listed as a separate Rating Criteria.

  - Effectiveness - Applicants should now demonstrate how the program is cost effective based on request amount and cost per service provided. Emergency shelter applicants requesting more than 105% of their previous award must base their increased request on program expansion or other significant factors.

- Budget Reasonableness/Application Completeness – This item has been added to the Rating Criteria to address how the application meets all program thresholds and contains all required exhibits and budget figures are accurate, consistent and reasonable.

Budget Amendments

- The language for the Budget Amendments section has been updated to differentiate between

housing stability and emergency shelter activities. The language for housing stability activities will remain the same as the previous year, but emergency shelter activities has been updated with the following language, "a budget amendment is required if the grantee wishes to increase or decrease a previously approved activity by more than $5,000 or 10 percent, whichever is greater. These thresholds must be applied to both the activity from which the funds are to be decreased and the activity to which the funds will be increased. Please note that the administration cap may not be exceeded."

V. Supportive Housing Program

The following changes are being proposed for SFY 2017:

Rating Criteria

- Under Program Design the proposal should demonstrate consistency with program requirements including, but not limited to, Housing First
- The HMIS/Outcomes Rating Criteria has been updated to require that applicants must demonstrate acceptable performance based on performance standards. At a minimum specific performance measures will include the following:

    - Number of persons and households served
    - Occupancy rates
    - Average length of stay
    - Percentage of leavers exiting to a permanent destination (Transitional Housing)
    - Percentage of persons maintaining housing or exiting to a permanent destination (Permanent Supportive Housing)

VI. Housing Assistance Grant Program

The following changes are being proposed for SFY 2017:

Eligible Activities

- Language that gave preference to persons at or below 50 percent AMI had been removed for both Down Payment Assistance Homebuyer Education activities.

VII. Housing Opportunities for Persons with AIDS Program

The following changes are being proposed for PY 2016:

Grant Ceiling

- The language indicating that applicants are encouraged to apply for an amount less than the maximum amount had been removed.

Eligible Activities

- Permanent housing placement had been added as an eligible activity.

VIII. Community Development Program

The following changes are being proposed for PY 2016:

Competitive Set-Aside Close-Out Process

- This section along with the following language has been added: Communities can request that OCD monitor and close a competitive set-aside project if the project is complete with all funds drawn and expended by April 30, 2016. The community must submit a written request to OCD by April 30, 2016.

Community Development Allocation Program

Allocation Calculation Principles

- Language has been added to indicate that "cities that no longer retain Direct City status will receive funding through the county of jurisdiction and will require a project commitment."

- Direct city status will be re-evaluated with the next release of American Community Survey Low/Moderate-Income Summary Data.

Eligible Jurisdictions

- The cities of Oregon and Wadsworth have been removed from the Direct Cities list based on the requirement that direct cities must have a 2010 LMI population of at least 30 percent or greater.

Programmatic Funding Guidelines

- Under Planning Activities, planning activities do not count towards the 20 percent cap on general administration and fair housing.

Fair Housing

- Communities are also required to include an Analysis of Impediments to Fair Housing Choice with the PY 2016 application submission.

Benefit Area Income Surveys

- OCD may require an applicant to conduct an income survey to qualify a project for program funding if ACS data does not appear to adequately represent the service area.
- Applicants are not permitted to combine ACS data and data from an income survey to qualify a service area.

Program Amendments

The Program Amendments section has been added and includes the following language:

- Because applications and grant awards are based on rating criteria, grantees are discouraged from changing their programs. OCD must review and approve amendment requests before grantees implement any proposed change. The OCD Amendment Policy is stated on page 127 and outlined in OCD Policy Notice 15-06: Grant Operations and Financial Management Policy. In general, amendments will not be allowed for new activities.

Program Extension

The Program Extension section has been updated to include the following language in addition to the previously included language:

- Although program extensions are discouraged, OCD will allow extended grant time periods under certain circumstances. OCD must receive a formal written extension request signed by the CEO of the grantee outlining the reasons for the delay and the proposed time frame. OCD may approve, deny, or request additional information regarding the extension request. If the request is approved, extension forms will be sent to the grantee for execution by the grantee. The extension forms must be signed by the grantee's authorized official and approved by its governing body. Upon receipt of the signed extension forms, OCD will complete the execution process and return one copy for the local files. The OCD Extension Policy is stated on page 127 and outlined in OCD Policy Notice 15-06: Grant Operations and Financial Management Policy.

Neighborhood Revitalization Grants

Grant Ceiling

- The grant ceiling has been increased from $300,000 to $500,000.

Administrative Cost

- The total amount available for administrative cost has been changed to a maximum of 15 percent or $50,000, whichever is less, of the total grant amount.

Eligible Activities

- Administration does not count towards one of the minimum three activities included as part of the NRG application.

- Demolition/Clearance activities are capped at $100,000 or 25 percent of the project request, exclusive of administration.

Ineligible Activities

- Direct benefit activities are ineligible but if a Community funds direct benefit and housing projects with other sources they will receive leverage points for dollars committed to the target area.

Benefit Area Income Surveys

- OCD may require an applicant to conduct an income survey to qualify a project for program funding if ACS data does not appear to adequately represent the service area.
- Applicants are not permitted to combine ACS data and data from an income survey to qualify a service area.

Rating System Principles

- Bonus leverage points can now be awarded for using all or part the communities Economic Development Revolving Loan Fund as matching dollars for neighborhood revitalization activities.

Downtown Revitalization Grants

Rating System Principles

- Feasibility of proposed private rehabilitation activities has been included as a component of leverage.
- Bonus leverage points can now be awarded for using all or part the communities Economic Development Revolving Loan Fund as matching dollars for neighborhood revitalization activities.

Critical Infrastructure Grants

Ineligible Activities

- Large scale, single-purpose water and sanitary sewer projects with a total project cost in excess of $200,000 will not be considered for this program. Previously, large scale projects didn't have a dollar amount included.

Benefit Area Income Surveys

- OCD may require an applicant to conduct an income survey to qualify a project for program funding if ACS data does not appear to adequately represent the service area.
- Applicants are not permitted to combine ACS data and data from an income survey to qualify a service area.

Expenditure of CDBG funds

- The CDBG grant funds must be expended on a pro-rata basis with the other public and private funds committed at the time of application and described in Attachment A of the grant agreement. The grantee must keep appropriate documentation of these expenditures on file to demonstrate compliance.

Rating System Principles

- Bonus leverage points can now be awarded for using all or part the communities Economic Development Revolving Loan Fund as matching dollars for neighborhood revitalization activities. Also, it will be based on the extent to which the community will coordinate efforts and implement other programs with the proposed activities.
- Program Design and Sustainability added language that applications will be based on the extent to which the activities are consistent with the needs and strategies described in the applicant's Community Development Implementation Strategy.

IX. Economic Development Loan and Public Infrastructure Grant Program

The following changes are being proposed for PY 2016:

Economic Development Loan Program

Application Review

- Applications must be submitted through OCEAN, OCD's web-based grants management system. OCD will provide access to the applicant community in OCEAN after the pre-application is submitted and reviewed.
- Communities are also required to include a discussion of the Economic Development Program and identify economic development needs as a component of the biennial Community Development Implementation Strategy

Economic Development Public Infrastructure Grant Program

Application Review

- Applications must be submitted through OCEAN, OCD's web-based grants management system. OCD will provide access to the applicant community in OCEAN after the pre-application is submitted and reviewed.
- Communities are also required to include a discussion of the Economic Development Program and identify economic development needs as a component of the biennial Community Development Implementation Strategy

Administrative Costs

- Units of general local government receiving grants for economic development projects shall be allowed a maximum of $20,000, not to exceed 10 percent of the project request, for general administration and implementation. Previously, this amount had been set at $10,000.
- OCD will evaluate the community's request during application review and reserves the right to reduce the award.

Expenditure of CDBG funds

- The CDBG grant funds must be expended on a pro-rata basis with the other public and private funds committed at the time of application and described in Attachment A of the grant agreement. The grantee must keep appropriate documentation of these expenditures on file to demonstrate compliance.

Residential Public Infrastructure Grant Program

Grant Ceiling

- The maximum grant ceiling includes project and program administration costs.

Grant Floor

The grant floor wasn't previously included in this section. The following language has been to this program:

- Minimum of $100,000; minimum total project cost of $200,000. Projects with a total cost of less than $200,000 or a grant request of less than $100,000 may be submitted under the Community Development Program Critical Infrastructure Competitive Set-Aside.

Administrative Costs

- OCD will evaluate the community's request during application review and reserves the right to reduce the award.

Expenditure of CDBG funds

- The CDBG grant funds must be expended on a pro-rata basis with the other public and private funds committed at the time of application and described in Attachment A of the grant agreement. The grantee must keep appropriate documentation of these expenditures on file to demonstrate compliance.

Program Benefit Survey

- OCD may require an applicant to conduct an income survey to qualify a project for program funding if ACS data does not appear to adequately represent the service area.
- Applicants are not permitted to combine ACS data and data from an income survey to qualify a service area.

X. Target of Opportunity Grant Programs

The following changes are being proposed for PY 2016:

CDBG Target of Opportunity Grant Programs

- The CDBG Target of Opportunity Grant Program now includes the Economic and Community Development Program component as well as the New Horizons/Fair Housing Program that was previously listed as a separate program. The following changes for those two programs are listed below:

Economic and Community Development

- A maximum of 10 percent or $10,000, whichever is less, of the total grant amount may be used for general administration, implementation, environmental review, audit and close-out.
- Public Service projects are not eligible for Target of Opportunity funding.
- All applicants must be able to demonstrate the ability to administer a Target of Opportunity Program. OCD may require a county to apply for grant funds on the behalf of a city or village within its jurisdiction if administrative capacity cannot be demonstrated by the city or village.
- Language has been added to the Rating System Principle section which requires that projects further the State of Ohio's investment objectives.

New Horizons Fair Housing Assistance Program

- The New Horizons Fair Housing Assistance Program is no longer a separate program. The program has now been included under the CDBG Target of Opportunity Grant Programs as a set-aside.

- Grant applications will only be accepted until March 31, 2017, which had a previous deadline of May 31st.

- The total amount of funds available will be set at $50,000. If funds haven't been allocated by April 15, 2017, they will be reallocated to the Economic and Community Development Target of Opportunity Program.

Ohio Housing Trust Fund (OHTF) Target of Opportunity Grants

There are no major changes being proposed for SFY 2017.

Homelessness Target of Opportunity Grants

- PY 2016 Emergency Solutions Grant funds will no longer be made available for the program.

Neighborhood Stabilization

- The eligible recipients list has been updated to include the following:
  - Entitlement cities previously funded through the state of Ohio's Neighborhood Stabilization Program 1 and are located in a non-entitlement county,
  - Non-entitlement cities and counties previously funded through the state of Ohio's Neighborhood Stabilization Program 1
  - Entitlement Counties that did not receive a direct allocation of NSP 1,2 or 3 from HUD.
  - Ohio Housing Finance Agency

- A maximum of 7 percent of each grant award can be used for administration, which was previously listed as 10 percent.
- The deadline for applications has been moved up from June 1st to March 31, 2017.

PY 2016 Consolidated Plan Budget

Programs	Federal And State Funds Total	Pct. of Total	Consolidated Plan Total[1]	Pct. of Total	Funding Sources: 1 Federal CDBG	2 Federal HOME	3 Federal ESG	4 Federal HOPWA	5 State OHTF[2]
Community Housing Impact and Preservation Program	$ 19,313,400	29.6%	$ 19,313,400	29.6%	$ 8,300,000	$ 11,013,400			*
Housing Development Assistance Program[2]	$ 4,000,000	6.1%	$ 4,000,000	6.1%		$ 4,000,000			*
CHDO Competitive Operating Grant Program	$ 200,000	0.3%	$ 200,000	0.3%		$ 200,000			
Affordable Housing Subtotal	$ 23,513,400	36.0%	$ 23,513,400	36.0%	$ 8,300,000	$ 15,213,400	$ -	$ -	$ -
Homeless Crisis Response Grant Program[3]	$ 5,331,400	8.2%	$ 5,331,400	8.2%			$ 5,331,400		*
Supportive Housing Grant Program	$ -	0.0%	$ -	0.0%					*
Housing Assistance Grant Program	$ -	0.0%	$ -	0.0%					*
Housing Opportunities for Persons With AIDS	$ 1,291,396	2.0%	$ 1,291,396	2.0%				$ 1,291,396	
Homelessness & Supportive Housing Subtotal	$ 6,622,796	10.1%	$ 6,622,796	10.1%	$ -	$ -	$ 5,331,400	$ 1,291,396	$ -
Community Development Program[4]	$ 20,600,000	31.6%	$ 20,600,000	31.6%	$ 20,600,000				
Economic Dev. & Public Infrastructure Program[5]	$ 10,100,000	15.5%	$ 10,100,000	15.5%	$ 10,100,000				
Microenterprise Business Development Program	$ -	0.0%	$ -	0.0%	$ -				*
Community & Economic Development Subtotal	$ 30,700,000	47.0%	$ 30,700,000	47.0%	$ 30,700,000	$ -	$ -	$ -	$ -
Discretionary Grant Program	$ 1,000,000	1.5%	$ 1,000,000	1.5%	$ 1,000,000	$ -	$ -		*
Training and Technical Assistance Funds	$ 367,000	0.6%	$ 367,000	0.6%	$ 367,000				*
Community Development Finance Fund	$ -	0.0%	$ -	0.0%					*
Resident Services Coordinator Program	$ -	0.0%	$ -	0.0%					*
Administration[6]	$ 3,048,327	4.7%	$ 3,048,327	4.7%	$ 925,727	$ 1,690,365	$ 432,235	$ -	*
Totals =	$ 65,251,523	100%	$ 65,251,523	100%	$ 41,292,727	$ 16,903,765	$ 5,763,635	$ 1,291,396	$ -

(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 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 Infrastucture Program includes Small Business Loans, Off-Site Infrastucture, and Residential Water & Sewer projects that were previously funded in separate programs.

(6) Approximately 60% of the HOME and 70% of the ESG administration allocation will be awarded to grant recipients.

REV 06-01-2016

Program Goals, Objectives, Performance Measures and Indicators

This section provides information on performance measures that were developed as part of the PY 2010-2014 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.

Housing

Rental units constructed	Household Housing Unit	88
Rental units rehabilitated	Household Housing Unit	162
Homeowner Housing Added	Household Housing Unit	25
Homeowner Housing Rehabilitated	Household Housing Unit	1,060
Direct Financial Assistance to Homebuyers	Households Assisted	17
Tenant-based rental assistance / Rapid Rehousing	Households Assisted	197

Community Development

Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1,017,807
Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	139,892
Facade treatment/business building rehabilitation	Business	143
Homeowner Housing Rehabilitated	Household Housing Unit	55
Buildings Demolished	Buildings	48

Economic Development

Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10,957
Facade treatment/business building rehabilitation	Business	0
Jobs created/retained	Jobs	89
Businesses assisted	Businesses Assisted	3

Homelessness and Supportive Housing

Tenant-based rental assistance / Rapid Rehousing	Households Assisted	300
Homeless Person Overnight Shelter	Persons Assisted	17,848
Homelessness Prevention	Persons Assisted	724

Comments on the Draft PY 2016 Ohio Consolidated Plan

The Office of Community Development held the 30-day public comment period beginning on March 1, 2016, along with a Public Hearing that will took place on March 17, 2016, in the Riffe Center on the 19th Floor. All comments received along with the corresponding responses prepared by OCD and the OHFA concerning the Draft PY 2016 Ohio Consolidated Plan are included below:

Comment: The criteria used to demonstrate administrative capacity for the Residential Public Infrastructure program should be applied to the Economic Development and Critical Infrastructure programs, and villages demonstrating administrative capacity should be allowed to apply.

Response: The Office of Community Development (OCD) has reduced the number and type of eligible applicants for the majority of its programs due to lower funding levels and shrinking staff. Economic Development projects are difficult to administer, require job tracking to meet a national objective, and may result in program income. Therefore, OCD only permits cities and counties to apply, and new program income accounts are only considered at the county-level. The Critical Infrastructure Program is not a stand-alone program, rather it is a Community Development Program set-aside. Direct applicants are counties and cities with a population of at least 15,000 and 30 percent low- and moderate-income (LMI). OCD's ongoing relationship with these communities ensures continued compliance. The Residential Public Infrastructure Program is the exception to the rule; villages are allowed to apply because the majority of the leveraged funds are awarded directly.

Comment: A number of communities provided comment to continue training and technical assistance funding provided by Heritage Ohio. They indicated that Heritage Ohio's workshops, trainings and assistance have helped communities with building rehabilitation, job creation, business recruitment and retention and infrastructure development.

Response: OCD sets aside CDBG funding to provide grants to state-wide T&TA providers. Heritage Ohio is an eligible applicant and has traditionally been provided grants to provide T&TA in partnership with OCD's CD DT set-aside.

Comment: A number of communities have expressed support for the Downtown Grants and Target of Opportunity grants through the CDBG Program. The programs help building owners tackle both large and small improvement projects, as well as by bringing vacant and blighted buildings back to life.

Response: OCD has set-aside approximately 50 percent of its CDBG funds for the CD Program, which includes a competitive DT Revitalization Program. OCD also sets funds aside for a Target of Opportunity Program. Rehabilitation of historic buildings is one of the eligible activities.

Comment: A comment was received that requests that the Supportive Housing Program that is funded with Ohio Housing Trust Funds to place additional emphasis on permanent supportive housing to end homelessness. The comment asks that OCD discourage transitional housing as the program is a very high cost program and is not efficient in ending homelessness, except for a number of given subpopulations.

Response: While OCD has not officially changed the standard maximum amount of the transitional housing and permanent supportive housing awards, OCD has granted numerous waivers for permanent supportive housing projects to exceed the maximum award amounts. In addition, new transitional housing program requirements focused on Housing First practices and assisting more difficult to serve populations have resulted in fewer transitional housing programs being funded or in some cases such programs being redesigned to a permanent supportive housing model. Based on the amount of Ohio Housing Trust Funds available for the 2017 Program year, OCD will consider modifying the maximum award amounts. Based on the demand for funds and the need to maintain a maximum amount for a state-wide program, it is likely that the amount will be kept at a lower level than needed for several programs, but will include the ability to obtain a waiver. OCD plans to continue emphasizing the importance of permanent supportive housing in an effort to end chronic homelessness and also recognizes the importance of transitional housing in certain situations as a communities response to ending homelessness.

Comment: A comment was received that requests that the Downtown Revitalization Grant Program be restored to a stand-alone program as it was prior to 2013. The program is currently administered by direct cities and counties that they feel are not prepared to take on the level of administration required.

Response: With reduced funding, OCD has reduced the number of direct grantees to maximize impact and lower administrative risk. OCD reviews DT applications for local government commitment (where the project occurs - not the county grantee), local downtown organization strength, and administrative capacity of the applicant and program administrators. Funded communities need to have an administrative capacity plan and demonstrate local commitment.