

City of Hamilton

BUTLER COUNTY OHIO



Annual Action Plan

Fiscal Year 2019 – 2020

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

Submit to U.S. Dept. of Housing & Urban Development
Spring, 2019



Amended in the Summer of 2020 to add CDBG-CV CARES Act funds in the FY 2019-2020 Annual Action Plan. Second Amendment Fall 2022.

Executive Summary

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

1. Introduction

Amendment

The City of Hamilton is submitting an amendment to the PY 19-20 City of Hamilton CARES Act Amendment funds due to the addition of CDBG-CV funds in the amount of \$855,817 granted by HUD during the Spring of 2020 and also in the amount of \$342,322 granted in the winter of 2020/2021. The City does not anticipate receiving HOME funds, and anticipates using the CARES Act funds to prepare, prevent, and respond to events caused by COVID-19.

Public Health

The City of Hamilton anticipates allocating approximately \$434,980 to address Public Health concerns as they relate to the prevention, preparation, and response to the Coronavirus Pandemic. Activities include and will not be limited to those undertaken by the City's Health Department.

Public Facilities

The City of Hamilton anticipates allocating approximately \$350,734 to address Public Facilities concerns as they relate to the prevention, preparation, and response to the Coronavirus Pandemic. Activities include and may not be limited to funds to Neighborhood Housing Services and the YWCA of Hamilton.

Public Services

The City of Hamilton anticipates allocating approximately \$412,425 to address Public Services concerns as they relate to the prevention, preparation, and response to the Coronavirus Pandemic. Activities include and may not be limited to funds to the YMCA of Hamilton, Neighborhood Housing Services, and HYPE Hamilton.

FY 2019-2020

The City of Hamilton submitted the Annual Action Plan for Fiscal Year 2019-2020 in accordance with the 24CFR 91.222. The Annual Action Plan identifies the activities to be funded with Community Development Block Grant (CDBG) resources received during the program year. The City of Hamilton anticipates that approximately \$1,433,787 was received in CDBG funds and approximately \$375,150 in HOME finds. The City will continue to concentrate its Community Development efforts in four (4) principles areas: Housing, Economic Development, Public Services, and Public Facility Improvements.

The Annual Action Plan covers both CDBG and HOME program funded projects for the 2019-2020 Program Year for the period of May 1, 2019 through April 30, 2020.

2. Summarize the objectives and outcomes identified in the Plan

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

Amendment

The proposed amendment and addition of CARES Act funds will aid the City in preparing, preventing, and responding to COVID-19. A 2nd Amendment was conducted and finalized with Council approval on October 12, 2022. The amendment included adjustments to the Public Facilities and Public Services projects. More specifically, amendment of the budget up to \$320,316 to include up to \$238,800 for Public Facilities & Improvements, and up to \$81,516 for Activity Delivery Costs for the Community Development Block Grant - CARES Act (CDBG-CV 3) funds.

FY 2019-2020 AAP

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

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

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

3. Evaluation of past performance

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

Amendment

In regards to the amended CDBG-CV funds the City has never received funds under this allocation (CDBG-CV) in the past.

FY 2019-2020 AAP

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

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

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

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

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

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Amendment

The City of Hamilton has requested "waivers" for CDBG and HOME due to the COVID Pandemic. The waivers have allowed the City to conduct virtual Public Meetings and shorten the public comment period to 5-days.

FY 2019-2020 AAP

The City of Hamilton has worked to create an effective Citizen Participation Process to ensure the appropriate, effective and comprehensive use of Community Development Block Grant (CDBG) and HOME funds. The City uses a four (4) point approach to engage active citizen participation (conducting a total of 4 public meetings) in the Consolidated Planning process which includes a needs assessment survey, public input meetings, draft Consolidated and/or Annual Action Plan comment period, and finally two (2) public hearings. As a means of attaining the feedback of residents residing in high poverty/low income areas of the jurisdiction, the City made efforts to conduct meetings in these said income areas (e.g. YMCA Booker T Washington Community Center, Heaven Sent Event Center, and Neighborhood Housing Services).

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

1. Public Meeting Notification flyers printed in English and Spanish;
2. Spanish and American Sign Language (ASL) translation available upon request at all public meetings/hearings and;

3. Extensive consultation with Butler County Homeless Coalition in quarterly meetings;
4. Coordination and posting of Public Meeting Notification Flyers in English and Spanish with local service agencies.

Additionally, all facilities, offices and public/semi-public spaces used for citizen participation are fully accessible for those with physical limitation.

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

- Public Meeting Notification flyers printed in English and Spanish;
- Online Needs Assessment Survey;
- Spanish and American Sign Language (ASL) translation available upon request at all public meetings/hearings;
- Extensive consultation with Butler County Homeless Coalition in quarterly meetings and;
- Coordination and posting Public Meeting Notification Flyers in English and Spanish with local service agencies.

Additionally, all facilities, offices, and public and semi-public spaces used for citizen participation are fully accessible for those with physical limitations.

5. Summary of public comments

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

Amendment

FY 2019-2020 AAP

The City of Hamilton utilized a survey method and also public meetings to gather feedback concerning community needs. One of the survey methods utilized was Google Surveys. Approximately 1765 emails were sent to persons who work, play, or live in the City of Hamilton. The email provided a link to a survey on Google Surveys. Of the 1765 persons emailed, approximately 116 responded and completed the survey. Below is a summary of the responses:

Online Survey Results:

Public Services & Housing Needs

Drug/Substance Abuse (99) - Significant Need;

Mental Health (82) - Significant Need;

Youth Services/Programs (81) - Significant Need;

Employment/Job Training (73) - Significant Need;

Services for the Homeless (72) - Significant Need.

Public Infrastructure and Facilities Improvement Needs

Youth Centers (65) - Significant Needs;

Homeless Facilities (64) - Significant Need;

Street Repaving/Repair (64) - Significant Need;

Neighborhood Business District Improvements (62) - Moderate Need;

Water/Sewer Improvements (61) - Moderate Need.

Mail Survey Results:

Public Services and Housing Needs

Drug/Substance Abuse Services (129) - Significant Need;

Crime Prevention (111) - Significant Need;

Mental Health Services (110) - Significant Need;

Elderly/Senior Services (105) - Significant Need;

Services for Battered Women & Children (101) - Significant Need.

Public Infrastructure and Facilities Improvement Needs

Street Repaving/Repair (163) - Significant Need;

Storm Water (Drainage) Improvements (109) - Low Need;

Sidewalk Repair/Installation (84) - Moderate Need;

Youth Center (79) - Moderate Need;

Senior Centers (78) - Moderate Need.

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

The City of Hamilton acknowledges all comments received pertaining to the Annual Action Plan. The summary of public comments received reveals that the highest priority/needs in the City of Hamilton are the Emergency Minor Home Repair Program, Drug/Substance Abuse Services, Mental Health, Street Repaving/Repair, Youth Centers, Crime Awareness/Prevention, Housing Rehabilitation, the Removal/Demolition of Unsafe/Dangerous or Abandoned Buildings, and the Economic Vitality of Downtown.

As a result of the above comments and limited funding availability, the City has chosen to address issues surrounding Youth Centers, Crime Awareness/Prevention, Housing Rehabilitation, the need for the Emergency Minor Home Repair Program, the Removal/Demolition of Unsafe/Dangerous or Abandoned Buildings, and the Economic Vitality of Downtown. Additionally, the City plans to address the Safety, Drug/Substance Abuse concerns, and Services for the Elderly by committing funds to the City of Hamilton's Fire Department/Rapid Response Systems.

7. Summary

The City of Hamilton has requested "waivers" for CDBG and HOME due to the COVID Pandemic. The waivers have allowed the City to conduct virtual Public Meetings and shorten the public comment period to 5-days.

Amendment Process:

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

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

A **Substantial Amendment** has been defined as and includes the following:

- Major budget adjustment related to financial resources (e.g. reallocation of funds; reimbursements, repayments, recaptures, and/or program income);

- A proposed change in the allocation or selection criteria for programs;
- As determined by HUD.

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

- The City should receive an amendment in writing from either a sub-recipient or appropriate staff member. The amendment will clearly state the reason for the change, the amount of the change, the beneficiary impact as well as any other pertinent information;
- The City will determine whether the amendment request is consistent with the stated and approved local Annual Action Plan and Consolidated Plan;
- The City will make a determination whether to proceed with the proposed amendment;
- The City will publish via social media that a substantial amendment is being considered and where a copy of the written request is available for public review;
- The City will allow a five (5) day public comment period; this period will commence upon the date of publication.

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

Contingency Provisions:

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

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

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

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

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

Table 1 – Responsible Agencies

Narrative (optional)

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

Consolidated Plan Public Contact Information

Tomika Hedrington, Neighborhood Development Specialist

City of Hamilton Neighborhood Development Division

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Hamilton, OH 45011

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

1. Introduction

Substantial Amendment

City contacted the City's Health Department Director and local nonprofits to determine the community's needs as they relate to the COVID-19 Pandemic. Appropriate and eligible nonprofit organizations were contacted to discuss services necessary to prevent, prepare for, and respond to the pandemic.

AAP 2019-2020

The priority needs for the Consolidated Plan and Annual Action Plan are determined by consultation with citizens, social service agencies, housing assistance providers and City Council. The five-year Strategic Plan for Hamilton specifies the types of activities that will be pursued based upon available resources. The highest priority needs in Hamilton include Drug/Substance Abuse Services, Youth Services Programs, Employment/Job Training, Mental Health Services, Crime Awareness/Prevention, Public Facilities/Infrastructure Improvements, and the City's Minor Home Repair Program. Housing projects in the jurisdiction will be ongoing and other associated projects will continue to be held at a high priority.

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

Substantial Amendment

Beginning June 12, 2020 thru June 19, 2020 The City posted a public notice in the Journal News requesting comments concerning the used of CDBG-CV funds. Comments were asked to be submitted in writing to the City's Finance Department. The City also hosted one (1) virtual public input meeting as part of the preparation of the Substantial Amendment. The meeting took place on June 18, 2020:

Topic: PY 2019-2020 City of Hamilton CARES Act Amendment

Time: Jun 18, 2020 02:00 PM Eastern Time (US and Canada)

Join Zoom Meeting

<https://us04web.zoom.us/j/75871802870?pwd=cGVPOGtORHludjFPN3Uwc28wNlplUz09>

Meeting ID: 758 7180 2870

Password: 3s2V7b

Annual Action Plan 2019-2020

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

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

Local government coordination and cooperation occurs in the form of consultation and project implementation. The City of Hamilton cooperates with Butler and Hamilton counties to obtain accurate information concerning persons with HIV/AIDS and the homeless. Lead-based paint hazard reduction is coordinated with the state of Ohio.

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

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

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

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

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

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

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

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

Table 2 – Agencies, groups, organizations who participated



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

The City of Hamilton consulted with organizations and representatives that could provide applicable and experienced feedback concerning the jurisdiction's housing, homeless, development, and support service needs. Additionally, the City consulted with organizations that would be best fitted to assist with the prevention, preparation, and response to the COVID Pandemic.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Butler County Housing & Homeless Coalition	Butler County is applying for a renewal grant for additional units of Shelter Plus Care rental assistance to serve chronically homeless single adults with qualifying disabling conditions. Butler County's and the Continuum of Care's efforts align with the jurisdiction's efforts to support and create housing opportunities for homeless and disabled individuals in the community.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Substantial Amendment

As part of the Substantial Amendment, the City contacted the City's Health Department Director and local nonprofits (e.g. Salvation Army, Open Door Food Pantry, Neighborhood Housing Services, Inc., etc.) to determine the community's needs as they relate to the COVID-19 Pandemic. Appropriate and eligible nonprofit organizations were contacted to discuss services necessary to prevent, prepare for, and respond to the pandemic. The City received "No Comments" during the 5-day public comment period; but City received the following questions during the Virtual Meeting:

Am I understanding correctly that the list of agencies or departments you showed are the only ones that will receive funding from the CARES ACT Funds?

Are other funds available now?

I am curious about the money for utility assistance. SELF normally administers funds for utility assistance. is this something different?

can you please send the application to me as well.

City representatives were able to answer the questions presented and received no additional feedback. Additional feedback was also not received during the City Council meeting.

Annual Action Plan

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

AP-12 Participation – 91.105, 91.200(c)

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

Substantial Amendment

The City conducted a 5-day public comment period by way of the local Journal News and also held a virtual Public Meeting on June 18, 2020.

Annual Action Plan

The City of Hamilton has worked to create an effective Citizen Participation Process to ensure appropriate, effective, and comprehensive use of Community Development Block Grant (CDBG) and HOME funds. The City uses a four (4) point approach to engage active citizen participation in the Consolidated Planning process which includes a needs assessment survey, three (3) public input meetings, draft Annual Action Plan comment period, and finally two (2) public hearings.

The City received feedback from one citizen concerning the use of funds for Public Services (i.e. funds to the local YWCA). The letter received is attached in the appendix and the City plans to consider additional funding options for the YWCA's Goodman Place project.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Meeting	Minorities Non-English	The City of Hamilton held its first FY 2019/20 Annual	Two participants provided comments during	The City of Hamilton takes into consideration all	

		<p>Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Action Plan public meeting at the Booker T Washington Community Center on August 14, 2018 at 6pm. The meeting was attended by two community members.</p>	<p>the public meeting at Booker T Washington Community Center. The participants agreed that their primary concern was for the residents in the 2nd ward of the City and their safety. Additionally, both participants mentioned the necessity for an increase in supportive services for local residents. More specifically the need to continue services to support the local youth and education to residents concerning proper home maintenance and waste disposal.</p>	<p>received comments.</p>	
2	Public Meeting	Minorities	The City of Hamilton	One of the primary	The City takes into	

		<p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>held its second FY 2019/20 Annual Action Plan public meeting at Neighborhood Housing Services, Inc. on August 15, 2018 at 1pm. The meeting was attended by approximately 43 persons.</p>	<p>topics of conversation concerned the need for improved Community Collaboration among local organizations, government entities, stakeholders, etc. Additionally, the top priorities listed among the participants were</p> <ol style="list-style-type: none"> (1) Employment/Job Training, (2) Drug/Substance Abuse Services, (3) Transportation Services, (4) Street Repaving/Repair, (5) Storm Water (Drainage) Improvements, (6) Public Parks and Recreation Facilities, (7) 	<p>consideration all received comments.</p>	
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				Services for Battered & Abused Spouses/Children.		
3	Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	The City of Hamilton held its third FY 2019/20 Annual Action Plan Public meeting at Heaven Sent Meeting Center. The meeting was attended by two (2) participants.	During the meeting the participants stated that the City would benefit from making improvements in the areas of Street Repaving/Repair, Homeless Facilities, and Employment/Job Training.	The City takes into consideration all received comments.	
4	Hard Copy Survey	Non-targeted/broad community	The City received a total of 196 hard copy survey responses. The responses were a combination of mail-in, received at public meetings, or collected by service	The top five Public Service and Housing Needs of the mail survey were Drug/Substance Abuse Services (129), Crime Awareness/Prevent	The City of Hamilton considers all comments received. More Specifically, in regards to the statement concerning the "need of affordable public and accessible transportation". The	

			<p>provider's survey responses.</p>	<p>ion (111), Mental Health Services(110), Elderly/Senior Services (105), and Services or Battered & Abused Spouses/Children (101). All were considered a "Significant Need" by respondents. 84 respondents stated that there is a Significant Need for emergency/minor home repair programs for low-income City of Hamilton residents. 104 respondents stated that there is a Significant Need for housing rehabilitation in the City of Hamilton. 199 respondents stated that there is a Significant Need</p>	<p>City has and continues to commit funds to the Butler County Regional Transit Authority to provide transportation services to the local residents (e.g. Employment shuttle). In response to the statement "Get it together and fix the streets", the City has and plans to commit funds to Street Resurfacing/Paving projects throughout the City.</p>	
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				<p>for affordable owner-occupied housing. 88 respondents stated that there is a Significant Need for affordable rental housing. The top five Public Infrastructure and Facilities Improvements Needs are Street Repaving/Repair (Significant Need-163), Storm Water (Drainage) Improvements (Low Need-109), Sidewalk Repair/Installation (Moderate Need-84), Youth Centers (Moderate Need-79), Homeless Facilities (Significant Need-79). 145 respondents stated</p>		
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				that removal/demolition of unsafe/dangerous or abandoned buildings are Very Important. 109 respondents stated that the improvements of the visual appearances of primary business districts, entryways, and streets are Very Important.		
5	Google Forms - Survey	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community	The City received a total of 116 online responses to the FY 2019-20 Annual Action Plan Public Input Survey.	The top five Public Services and Housing Needs of the online survey were Drug/Substance Abuse Services (99), Mental Health (82), Youth Services Programs (81), Employment/Job Training (73), and Services for the	The City of Hamilton considers all comments received. More specifically, in regards to the statement concerning the conditions of the streets, sidewalks, curbs, and gutters the City has annually committed CDBG funds to the resurfacing and paving of the City's	https://docs.google.com/forms/d/1KyKtewwOPDc87Fa5JRLjO7f8Cf334hzMMSmByM1ci6g/edit#responses

				<p>Homeless (72). Each were considered a "Significant Need". 47.7% (53 respondents) stated that there is a Significant Need for emergency/minor home repair programs for low-income City of Hamilton residents, 64.6% (73) respondents stated that there is a Significant Need for Housing Rehabilitation, while 43.6% (48) respondents stated that there is a Moderate Need for affordable rental housing. The top five Public Infrastructure and Facilities</p>	<p>sidewalks and streets. The City plans to continue to do so as funds are made available and based upon community need. Nonetheless, in FY2019-20 it is anticipated that CDBG funds will not be utilized for street resurfacing and paving. Instead the City will work with the county to have a Street Repair Levy placed on the May 2019 ballot.</p>	
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				Improvements were Youth Centers (Significant Need-65), Homeless Facilities (Significant Need-64), Street Repaving/Repair (Significant Need-64), Neighborhood Business District Improvements (Moderate Need-62), and Water/Sewer Improvements (Moderate Need 61).		
6	Public Meeting	Non-targeted/broad community				

7	Public Meeting	Non-targeted/broad community	<p>On June 18, 2020 City representatives led a virtual public meeting to discuss the possible uses for CDBG-CV 1 funds and the application process. Approximately 15 participants participated in the virtual meeting.</p>	<p>During the meeting participants expressed interest in learning the available uses for the funds, and stressed their concern with the pandemic and ways to keep it from spreading in the community.</p>	<p>All comments were received and taken into consideration.</p>	
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8	Public Meeting	Non-targeted/broad community	<p>On April 20, 2021 City representatives led a virtual public meeting to discuss the possible uses for CDBG-CV 3 funds and the application process. Unfortunately only one (1) participant attended the virtual meeting.</p>	<p>During the meeting participants expressed interest in learning the available uses for the funds as they relate to youth services and stressed their concern with the pandemic and ways to keep it from spreading in the community but providing a safe educational environment for youth.</p>	<p>All comments were received and taken into consideration.</p>	
9	Public Hearing	Non-targeted/broad community	<p>On April 28, 2021 the city held a public hearing regarding the use of CDBG-CV 3 funds. During this time an Audience of Citizens had the opportunity to provide feedback concerning the use of funds.</p>	<p>During the public hearing no comments were received.</p>	<p>Comments are always welcome and received.</p>	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Hamilton anticipates utilizing Community Development Block Grant (CDBG) funds in the amount of \$1,433,787 and HOME entitlement funding in the amount of \$375,150 for fiscal year 2019-2020. The City proposes to maintain its Housing Rehabilitation program through its established Revolving Loan Fund (RLF). The City will continue to work with a local CHDO to provide down-payment and closing cost assistance to qualified persons. The City will collaborate with local non-profit organizations to create housing units for those moving from local shelters into permanent housing. The City will also work with non-profit organizations to develop affordable housing units for extremely low-income residents.

CDBG-CV - The City of Hamilton received an initial allocation of CDBG-CV funds in the amount of \$855,817. An additional allocation of CDBG-CV 3 funds was allocated in the amount of \$342,322. Totaling \$1,198,139.

Anticipated Resources

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

CDBG	public - federa l	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,433,787	60,773	0	1,494,560	0	PI includes HRLF & CRLF payments, Misc. Rev & local acct funds
HOME	public - federa l	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	375,150	4,491	0	379,641	0	
General Fund	public - local	Other	49,167	0	0	49,167	0	Estimated at 12.5% Match for HOME funds
Other	public - federa l	Other	1,198,139	0	0	1,198,139	0	The City anticipates receiving CDBG-CV funds to appropriately prevent, prepare for and respond to the Coronavirus Pandemic.

Table 1 - Expected Resources – Priority Table

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

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

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

The **12.5%** HOME Match will be satisfied from the City's General Funds.

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

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

Discussion

N/A

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Clearance and Demolition	2017	2021	Non-Housing Community Development	Low/Moderate Income Areas All HUD eligible areas within the City of Hamilton	Clearance and Demolition	CDBG: \$165,500	Housing Code Enforcement/Foreclosed Property Care: 6000 Household Housing Unit Other: 550 Other

3	Public Facilities/ Improvements	201 7	202 1	Non- Housing Communit y Developm ent	Low/Mode rate Income Areas All HUD eligible areas within the City of Hamilton	Public Facilities	CDBG: \$836,994 CDBG-CV: \$718,714	Other: 13975 Other
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4	Public Services	2017	2021	Non-Housing Community Development	Low/Moderate Income Areas All HUD eligible areas within the City of Hamilton	Public Services Fair Housing AFH Factor 7: Transportation AFH Factor 4: Impediments to Mobility AFH Factor 5: Lack of Assistance for Transitioning	CDBG: \$193,000 CDBG-CV: \$412,425	Public service activities other than Low/Moderate Income Housing Benefit: 2075 Persons Assisted Housing for Homeless added: 8 Household Housing Unit Other: 10000 Other
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5	Economic Development	2017	2021	Non-Housing Community Development	Low/Mode rate Income Areas All HUD eligible areas within the City of Hamilton	Economic Development	CDBG: \$32,803	Businesses assisted: 1 Businesses Assisted
8	AFH Goal 6: Availability of affordable units	2017	2021	Affordable Housing Public Housing Non-Homeless Special Needs	Low/Mode rate Income Areas All HUD eligible areas within the City of Hamilton	AFH Factor 1: Location/type of affordable housing AFH Factor 6: Availability of affordable units	CDBG: \$154,895 HOME: \$222,503 General Fund: \$24,172	Homeowner Housing Added: 1 Household Housing Unit Homeowner Housing Rehabilitated: 35 Household Housing Unit

11	AFH Goal 3: Source of Income Discrimination	201 7	202 1	Affordable Housing	Low/Mode rate Income Areas All HUD eligible areas within the City of Hamilton	AFH Factor 3: Source of Income Discrimina tion	HOME: \$113,673	Direct Financial Assistance to Homebuyers: 19 Households Assisted
13	AFH Goal 5: Availability of Affordable Units	201 7	202 1	Affordable Housing	Low/Mode rate Income Areas All HUD eligible areas within the City of Hamilton	AFH Factor 6: Availabilit y of affordable units	General Fund: \$24,995	Homeowner Housing Added: 1 Household Housing Unit

Table 2 – Goals Summary

Goal Descriptions



Projects

AP-35 Projects – 91.220(d)

Introduction

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

Substantial Amendment -

In the winter of 2022-23, the City amended funds for Public Facilities and Housing activities including: Hamilton Living Water - HVAC Improvements, City of Hamilton Fire Department - Site Acquisition, Housing Contractual, and NHH Emergency Home Repair Program. The City held a public comment period from December 5, 2022 to January 3, 2023. Additionally, the city held a public hearing on January 11, 2023 at 6pm.

Projects

#	Project Name
1	HOUSING - CDBG & HOME ACTIVITIES
2	Economic Development - Direct Financial Assistance
3	Health Dept. Special Code Enforcement & Slum & Blight Remediation
4	Public Facilities & Improvements
5	Public Services - 15% CAP
6	NDD CDBG Administration 20% CAP
7	S.E.L.F. - Rehab and Resale for Homebuyer
8	NDD - HOME Administration (10% CAP)
9	NHH Down Payment & Closing Cost Assistance-2019
10	CHDO Operating Expense - 5% CAP
11	CV-Public Health
12	CV-Public Facilities
13	CV - Public Services

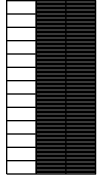
Table 3 - Project Information

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

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

In the past, the City of Hamilton has committed funds to improve Public Facilities as they relate to Street Resurfacing & Public Infrastructure. Unfortunately, due to the need to commit funds for emergency response providers, the City of Hamilton City Council has unanimously approved a resolution asking the Butler County Board of Elections to place a 4.9 mill street repair levy before votes on the May 7, 2019 ballot. If the levy is voted into action it would expire after ten (10) years and before then potentially generate approximately \$3.9 million annually. It is anticipated that through the levied funds the City could repair up to five (5) miles of streets, and also maintain up to five (5) miles of streets. The approval of the levy is imperative to continuing the City's efforts to improve the streets and sidewalks in the community in spite of functioning on limited funds.

AP-38 Project Summary
Project Summary Information



AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

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

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

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

Geographic Distribution

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

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

As part of the Consolidated Plan and Annual Action Plan development, the City determined that it is best to focus the limited FY 19-20 funding resources within target geographical neighborhoods. Maps of the five (5) target areas are included in the appendix of the Consolidated Plan and Annual Action Plan. The five areas and corresponding census tracts are Rossville (CT 11), German Village (CT 146), Dayton Lane/North Dayton Lane (CT 6), Wilson Symmes/2nd Ward (CT 3), and Jefferson/North Jefferson (CT 4).

Discussion

The City reviewed 2010 Census and statistical information for ten (10) neighborhoods that have been determined to have at least 70% of its population with low and moderate incomes (80% of the City's

Median Family Income). The determined neighborhoods are: Bonnacker/Lincoln, Dayton Lane/North Dayton Lane, East Hamilton, German Village, Gordon-Cereal/Star Hill, Jefferson/N.Jefferson, North End, North Lindenwald, Rossville and Second Ward/Wilson Symmes. Information from the U.S. Census Bureau was analyzed and assigned a point value. The following information was used for the analysis: Population, Number in Household, Percentage of Households with Incomes Below \$10,000, Median Household Income, Per Capita Income, Percentage of Population Living below the Poverty Level, Number of Housing Units Vacant, Percentage of Rental Housing Units, and Percentage of Housing Units built prior to 1939. From these ten (10) neighborhoods the five (5) targeted areas were selected.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

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

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

One Year Goals for the Number of Households to be Supported	
Homeless	8
Non-Homeless	19
Special-Needs	0
Total	27

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	1
Rehab of Existing Units	50
Acquisition of Existing Units	1
Total	52

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

Discussion

The City of Hamilton plans to commit funds to the following housing providers as an effort to increase the availability of affordable housing in the jurisdiction:

- ***Neighborhood Housing Services (NHS) - Down-payment/Closing Costs Assistance;***
- ***Neighborhood Housing Services (NHS) - New Construction for Homeownership***
- ***S.E.L.F. - Rehabilitation and Resale Program;***
- ***SERVE City Welcome Home Program;***

- ***The City of Hamilton's Minor Home Repair Program.***

AP-60 Public Housing – 91.220(h)

Introduction

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

BMHA conducted a market analysis in 2005 to determine the types of units needed for future demand. BMHA's units in the City of Hamilton range from twenty to over sixty years in age. The units are primarily large family three and four bedroom units. BMHA has concluded that based on current demand and demographics smaller units (e.g. one and two bedroom units) will be needed in the future. Additionally, senior housing units have experienced an increase in demand. As the number of elderly/senior population in the jurisdiction increases.

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

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

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

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

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

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

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

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

The local PHA has not been designated as troubled.

Discussion

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

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

Introduction

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

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

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

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

Addressing the emergency shelter and transitional housing needs of homeless persons

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

Several community-wide agencies assist with homeless prevention such as rent and utility assistance through Supports to Encourage Low Income Families (S.E.L.F.) and the local Community Action Partnership of Greater Dayton, Ohio area office. Emergency shelter assistance is also provided via a voluntary church hospitality network, CHOSEN in Hamilton and SHALOM in nearby Middletown. Additionally, the City supports Transitional Living, Inc.'s working relationship with Butler Metropolitan Housing Authority (BMHA) to address the needs of homeless individuals/families with special needs. The Homeless Coalition, utilizing Butler County as the grantee, has applied for the recertification of **twenty-three (23) units of Shelter Plus Care** rental assistance to serve chronically homeless single adults with a qualifying disabling condition(s), and also the renewal of **twenty (20) units of Shelter Plus Care** rental assistance for homeless individuals and families with a qualifying disabling condition(s).

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

recently homeless from becoming homeless again

The City of Hamilton plans and will continue to commit funds and support to programs and community organizations to assist homeless person in making the transition to permanent housing and independent living. The City anticipates funding SERVE City's Welcome Home project. The project "is a new and innovative program aimed at providing intensive wraparound services to homeless individuals to move them from street level homelessness into permanent, market-rate housing". The City also commits funds to the City of Hamilton's Internal Services for the Victim's Advocacy Program. The program provides counseling services to children and non-offending family members who have experienced trauma as a result of abuse. The program also provides assistance to individuals seeking to file Domestic Violence Civil Protection Orders (CPO) in the Butler County Domestic Relations Court.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The City of Hamilton has and plans to continue to assist low-income individuals and families from becoming homeless. As a result, the jurisdiction has partnered with and will facilitate discussions with local publicly funded institutions, systems of care, and organizations receiving assistance from public or private agencies to address the housing, health, social services, employment, education, or youth needs of the stated individuals and families. An example of programming supported by the City utilizing CDBG funds includes the support provided to the local YMCA - Booker T Washington Community Center, Victim's Advocacy Program, and Serve City's Welcome Home project.

Discussion

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

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

Introduction:

Two factors that affect the affordability of housing in a community are local property taxes and utility costs. According to the Butler County Auditor, [Rates of Taxation in Butler County, Ohio Tax Year 2017](#), the total effective rate class one for the City of Hamilton and the Hamilton City School District were the second (2nd) lowest in the immediate area. For example, Hamilton's taxes have decreased and are 53.55 mills as compared to: 59.49 mills for Fairfield City; 63.89 mills for Liberty Township; 41.85 mills for Oxford; and 71.59 mills for Middletown.

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

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

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

Discussion:

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

AP-85 Other Actions – 91.220(k)

Introduction:

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

Actions planned to address obstacles to meeting underserved needs

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

Actions planned to foster and maintain affordable housing

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

Actions planned to reduce lead-based paint hazards

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

Actions planned to reduce the number of poverty-level families

The City feels that poverty reduction is an ongoing process. However, the City attempts to quantify program and project outcomes to measure against assumed baseline figures. As an example, the City assumed that approximately 853 housing units have lead based paint issues (using HUD's formula for calculation). The City recognizes that lead abatement is proposed to be done on four- (4) units. Therefore, we can assume that approximately 849 units will have lead paint issues after the next grant cycle. Depending on projects and programs, baseline measures have and will continue to be developed. Additionally, the City uses statistical information for calculating the reduction rate of poverty. The three- (3) most used sources to determine the extent of poverty reduction by the City is unemployment rate, census income information and local income tax information.

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

Actions planned to develop institutional structure

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

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

Public Institution:

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

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

Private Industry

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

Discussion:

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed
 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan
 3. The amount of surplus funds from urban renewal settlements
 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.
 5. The amount of income from float-funded activities
- Total Program Income

Other CDBG Requirements

1. The amount of urgent need activities

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

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:
2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:
3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:
4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

