Ohio | Department of Development

Office of Community Development

Fiscal Year 2012
Ohio Consolidated Plan

May 2012

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Introduction

The state of Ohio is required annually to prepare and submit a Consolidated Plan to the U.S. Department of Housing and Urban Development (HUD), pursuant to regulations at 24 CFR 91.320, to access certain types of HUD funds. The purpose of the Consolidated Plan is to describe the programs and activities that the Office of Community Development will administer with Federal Fiscal Year 2012 HUD and State Fiscal Year 2013 awarded funds. The program year for FY 2012 funded activities begins on July 1, 2012 and ends June 30, 2013. The Consolidated Plan must cover four HUD programs; including the Community Development Block Grant (CDBG) Program, the HOME Investment Partnerships Program, the Emergency Solutions Grant (ESG) Program and the Housing Opportunities for Persons With AIDS (HOPWA) Program. Funding from these programs is awarded to the state by HUD, and distributed by the Ohio Department of Development's (ODOD) Office of Community Development (OCD). OCD has established a variety of programs for distributing the HUD funds, along with state funds. Each of the programs and activities that are proposed for FY 2012 are described in detail in the Consolidated Plan, along with the proposed funding amounts.

FY 2012 Citizen Participation and Consultation Process

OCD carried out a number of activities designed to obtain comments, perspectives, and opinions of citizens during the preparation of the FY 2012 Ohio Consolidated Plan. Notification of all public hearings and meetings was made at least 10 days in advance of the meetings through newsletters, direct mail and through posting on the OCD website at http://www.development.ohio.gov/Community/ohcp/publications.htm. Records of these actions and documentation are available for review at the OCD office, located on the 25th floor at 77 South High Street in Columbus, Ohio during regular business hours. The specific citizen participation activities are described as follows.

1. Public Hearing On Needs

OCD held a public hearing on needs issues on September 16, 2011 in Room 1932 on the 19th Floor of the Riffe Center, in Columbus. Notification of the Public Hearing on Needs was directly mailed to approximately 900 local communities, organizations and agencies throughout the state at least 30 days in advance. The notification was also published on OCD's website. The notification summarized the state's planning process for the Consolidated Plan, and solicited participation in OCD's Program Advisory Committee meetings. Written comments on needs issues were accepted by OCD for a 15-day period between September 2, 2011 and September 16, 2011. 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 their consideration during the planning process.

2. Program Advisory Committees

Meetings were held with 10 Program Advisory Committees on October 3 and 4, 2011. Each of the Program Advisory Committees were comprised of at least 10 members, including local officials, program administrators, non-profit organizations, and other agencies, organizations and individuals familiar with OCD's programs and/or the Housing Development Assistance Program administered by 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
- Water and Sanitary Sewer Program Advisory Committee
- Fair Housing/New Horizons Program Advisory Committee
- Economic Development Program Advisory Committee
- Microenterprise Business Development Program Advisory Committee
- Community Housing Improvement Program Advisory Committee
- Housing Development Assistance Program (HDAP) Advisory Committee
- Comprehensive Downtown Revitalization Program Advisory Committee

- Homeless Crisis Response Program / Housing Assistance Grant Program Advisory Committee
- Housing Opportunities for Persons With AIDS Program Advisory Committee

3. Consolidated Plan Program Advisory Committee Meeting

The FY 2012 Ohio Consolidated Plan Advisory Committee met on February 23, 2012 to review the Draft FY 2012 Ohio Consolidated Plan. The Ohio Consolidated 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, 2012, notification will be sent to approximately 900 communities, agencies and organizations, informing them that the Draft FY 2012 Ohio Consolidated Plan and Executive Summary were to be posted on OCD's website at http://development.ohio.gov/Community/ohcp/publications.htm for review and comment. This notification also announced the beginning of the mandatory 30-day public comment period on the draft plan, including a public hearing on March 22, 2012 in Room 1952 on the 19th Floor of the Riffe Center, 77 South High Street, in Columbus, Ohio at 1:30 p.m. All comments received will be included in the Draft FY 2012 Consolidated Plan.

Submission to HUD

The final Consolidated Plan document will be submitted to HUD for a 45-day review period on or about May 13, 2012. Notification of the posting and availability of the final FY 2012 Ohio Consolidated Plan will be sent to approximately 900 communities, agencies and organizations throughout the state.

Resources Expected To Be Made Available

Federal Resources

The federal resources that are expected to be made available to the state by HUD for FY 2012 are indicated below. OCD and OHFA have established a variety of programs through which these funds will be distributed. Table 4, columns 1-4, show how these federal funding sources will be distributed among the various OCD and OHFA programs. Following Table 4, the guidelines for each of the programs are described in detail.

$ 40,493,807	Community Development Block Grant (CDBG) Program
$ 17,635,481	HOME Investment Partnerships Program
$ 5,971,579	Emergency Solutions Grant (ESG) Program
$ 1,274,948	Housing Opportunities for Persons With AIDS (HOPWA) Program
$ 65,375,815	Total Federal FY 2012 Funds

OCD and OHFA have established several policies on how these funds can be used. These policies are listed below for each of the four respective HUD funding sources.

CDBG Program:

The following policies will apply to the FY 2012 CDBG funds:

1. The amount of administrative funds may be slightly higher, if the base for the state's administrative cap includes program income. Also, the amount for administration shown on Table 4 covers only OCD general administration. Grantees may be awarded additional administrative funds for local administrative costs associated with CDBG programs. Also, pursuant to guidelines issued by HUD, CDBG administrative funds will be used for HOME Program administrative costs incurred by local HOME grantees. OCD and local CDBG program administration cannot exceed 20% of the total CDBG allocation.

2. The funds budgeted for the Training and Technical Assistance Program is from the 1% allowance for technical assistance. CDBG funds will be available for the Training and Technical Assistance Program.

3. Recaptured funds will be distributed by the state for the same type of program activities from which the recaptured funds are derived and for which they were originally programmed.

4. Funds set aside for the Economic Development Program which are not substantially committed to specific projects by the end of April, will be transferred to the appropriate program, at the discretion of OCD, in order to meet timeliness requirements.

In the event that the total FY 2012 CDBG allocation to the state will be either less or more than the amount that the State expects to receive, available state funds will be allocated proportionately, based on the FY 2012 proposed budget amounts as shown on Table 4, page 10.

HOME Program:

The following policies will apply to the FY 2012 HOME funds:

1. The 10% HOME administrative funds will be used for both the ODOD administrative costs and HOME Program administrative costs incurred by state-funded HOME grantees. (Approximately 60 percent of these administrative funds will be distributed to state recipients and other local grantees.)

2. In the event that the total FY 2012 HOME allocation to the state will be either less or more than the amount that the State expects to receive, funds will be allocated proportionately, based on the FY 2012 proposed budget amounts, as follows:

Community Housing Improvement Program	64.4%
Housing Development Assistance Program	25.5%
Administration	9.9%

ESG Program:

The following policies will apply to the FY 2012 ESG funds:

1. The ESG Program allocations are based on the assumption that the state will receive approximately $ 5.6 million in FY 2012 McKinney Emergency Solutions Grant Program funds from HUD.

2. Up to 5% of federal ESG funds will be used for administrative costs, of that, 60% goes to grant recipients and 40% stays with OCD.

HOPWA Program:

The following policies will apply to the FY 2012 HOPWA funds:

Of the amount allocated for the HOPWA Program, about $4,000 will be used for OCD general administration, additional funds may be used by local grantees for local HOPWA Program general administration.

Federal Low-Income Housing Tax Credits

The state of Ohio expects to receive an allocation of $24 million in tax credits through the Low-Income Housing Tax Credit Program in the upcoming year. The tax credits can be used to generate equity that must be used to finance part or all of the development of affordable rental housing projects. The Ohio Housing Credits are administered through the OHFA, and often used in conjunction with federal HOME or Ohio Housing Trust Fund (OHTF) gap funding, along with private dollars, to finance affordable rental housing projects.

Other Resources

Several OCD programs will combine federal funds with OHTF, as indicated on Table 4. Final allocations of the OHTF must be approved by the OHTF Advisory Committee and grant awards are contingent on approval by the state Controlling Board. Additionally, there are a variety of other federal, state and private resources that are expected to be made available during FY 2012 and which local communities and non-profit organizations have used in the past to fund housing and community development-related activities. It would be extremely difficult to state the exact amounts of funding that will be made available from these other sources. Instead, a series of tables are included which indicate the sources of other funds expected to be made available for the three major program areas covered in the Consolidated Plan. Specifically, Table 1 shows the sources of other funds expected to be made available for housing activities, while Table 2 and Table 3 show resources for economic development and community development programs, respectively.

Matching Funds

Of the four programs covered in the Consolidated Plan, three require matching funds. The HOME Program requires a 25% match (i.e., for every dollar of HOME funds expended, the state must provide $0.25 of matching funds. HOME match in FY 2012 will be covered by OHTF dollars that are used in conjunction with projects funded through the HDAP.

Another program which requires matching funds is the ESG Program, which requires a 1:1 state match for every dollar of federal ESG funds expended. This matching requirement will be met in FY 2012 by requiring ESG Program applicants to commit matching funds in their applications for funds. No application will be approved that does not contain sufficient matching funds.

Finally, OCD CDBG administration funds expended in excess of $100,000 must be matched on a 1:1 basis using state funds.

Table 1: Additional Resources for Housing, Homeless and Supportive Services*

Note: Resources include funds provided through state and federal agencies and foundations.

The non-OCD funds listed have been significantly utilized by OCD grantees. There are funds utilized by OCD grantees that are not listed on this matrix.

		Beneficiary Type					Activity Type							
Agency	Program	Owner	Home-buyer	Renter	Home-less	Special Needs(1)	Acquire Only	New Const.	Rehabili-tation	Weatheriza-tion/Repair	Transi-tional Hsg.	Homeless Prevention	Rental Asst.	Support Services
OHFA	Housing Development Loan Program	x		x			x	x	x					
Ohio Dept. of Aging	Resident Service Coordinator Program			x		x								x
OHFA	Housing Credit Program			x				x	x		x			
OHFA	Single Family Mortgage Revenue Bond Program		x				x							
OHFA	Mortgage Credit Certificate Program		x				x							
OCS	Home Weatherization	x		x						x				
OCS	Home Energy Assistance Program	x		x										x
ODA	Home Repair and Modification Program	x							x					
OCS	Community Services Block Grant				x							x		x
United Way					x							x		x
FEMA	Emergency Food and Shelter Program				x							x		
ODE	Education of Homeless Youths				x							x		x
ODJFS	Title 20				x									x

*Please refer to the Listing of Acronyms.

(1) Special Needs Persons are non-homeless, and may include frail elderly persons, persons with AIDS, and disabled families.

Table 1: Additional Resources for Housing, Homeless and Supportive Services (continued)*

Note: Resources include funds provided through state and federal agencies and foundations.

The non-OCD funds listed have been significantly utilized by OCD grantees. There are funds utilized by OCD grantees that are not listed on this matrix.

		Beneficiary Type					Activity Type							
Agency	Program	Owner	Home-buyer	Renter	Home-less	Special Needs(1)	Acquire Only	New Const.	Rehabili-tation	Weatheriza-tion/Repair	Transi-tional Hsg.	Homeless Prevention	Rental Asst.	Support Services
ODODD	Community Capital Assistance Grants				x	x	x		x			x		
ODODD	Supported Living Program				x	x						x	x	x
ODODD	Purchase of Service				x	x						x		x
ODMH	Community Capital Funding Program					x	x	x						
ODMH	Residential Services Program				x	x						x		x
ODMH	PATH Program				x	x						x		x
CDFF	Linked Deposit Program	x		x			x	x	x					
CDFF	Pre-Development Program	x		x			x	x	x					
USDARD	Section 502 Single Family Housing - Direct		x				x	x						
USDARD	Guaranteed Rural Housing		x				x	x						
USDARD	Section 504 Rural Housing Loans and Grants	x							x					
USDARD	Section 515 Rural Rental Housing			x				x	x					
USDARD	Section 533 Housing Preservation Grants	x							x					
Ohio Dept. of Health	Ryan White					x						x		x
ODADAS	HUD Homeless Assistance HUD Homeless Assistance 1996 Continuum of Care					x								x

*Please refer to the Listing of Acronyms.

(1) Special Needs Persons are non-homeless, and may include frail elderly persons, persons with AIDS, and disabled families.

Table 2: Additional Resources for Economic Development*

Note: Resources include funds provided through federal agencies and other state agencies.

The non-OCD funds listed have been significantly utilized by OCD grantees. There are funds utilized by OCD grantees that are not listed on this matrix.

				Activity Type				Financing Type	
Agency	Program	Geography	Machinery & Equipment	New Construction	Rehabil-itation	Infra-structure	Training & Tech. Support	Tax Credit / Abatement	Direct Assistance
ODOD	Road Work Development Fund - 629 Account	Statewide				x			
ODOD	Ohio Workforce Guarantee	Statewide					x		
ODOD	Enterprise Zones	State Enterprise Zones						x	
ODOD	166 Loan Program	Statewide	x	x	x				x
ODOD	166 Regional Loan Program	Statewide	x	x	x				x
ODOD	Business Development - 412 Program	Statewide	x			x			x
ODOD	Ohio Enterprise Bond Fund	Statewide	x	x	x				x
OSDC	Small Business Admin. 504 Loan Program	Statewide	x	x	x				x
OSDC	Small Business Admin. 7(A) Loan Guaranty	Statewide	x	X	x				x
EDA	Economic Development Grant Programs	Statewide		x	x	x	x		x
GOA	Appalachia Regional Commission	Appalachian Counties		x	x	x	x		x
USDARD	Rural Business Enterprise Grants	Rural Areas/Cities < 50,000	x	x		x	x		x
USDARD	Business & Industrial Guaranteed Loans	Rural Areas/Cities < 50,000	x						x
USDARD	Intermediary Relending Program	Rural Areas < 25,000	x	x	x	x	x		x
OWDA	Issue 2	Statewide				x			x
ODOT	Various Programs	Statewide				x			x

*Please refer to the Listing of Acronyms.

(1) Note: There is a maximum amount of funds that may be used for Training & Technical Support activities.

Table 3: Additional Resources for Community Development*

Note: Resources include funds provided through federal agencies and other state agencies.

The non-OCD funds listed have been significantly utilized by OCD grantees. There are funds utilized by OCD grantees that are not listed on this matrix.

Agency*	Program	Eligible Geographic Area	Activity Type						
			Public Facilities				Community Facilities	Private Rehabi-litation	Public Services
			Streets	Water & Sewer	Flood & Drainage	Other			
USDA RD	Community Facility Guaranteed Loans	Small Tow ns/Rural Areas	x			x	x		
USDA RD	Community Facility Loans	Small Tow ns/Rural Areas	x			x	x		
USDA RD	Water & Waste Disposal Loans & Grants	Small Tow ns/Rural Areas		x					
USDA RD	Solid Waste Management Grants	Small Tow ns/Rural Areas		x					
USDA RD	Water & Waste Disposal	Small Tow ns/Rural Areas		x					
OWDA & OEPA	Ohio Water Pollution Control Loan Fund	Statew ide		x		x			
OWDA	Construction Loans	Statew ide		x					
OWDA	Planning Loans	Statew ide		x					
OWDA & OEPA	OWDA Tw o Percent Hardship Drinking Water Loans	Statew ide		x					
OEPA	Municipal Wastew ater Assistance Program	Statew ide		x					
ODNR	Grant and Loan Programs	Statew ide		x	x	x			x
OPWC	State Capital Improvements Program (Issue 2)	Statew ide	x	x	x	x			
OPWC	Local Transportation Improvements Program (Issue 2)	Statew ide	x						
GOA	Appalachia Regional Commission	Appalachian Counties	x	x	x	x	x		x
ODOT	Various Programs	Statew ide	x						

*Please refer to the Listing of Acronyms.

Table 4: FY 2012 Consolidated Plan Program Summary

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 Improvement Program	$ 20,872,000	31.9%	$ 20,872,000	31.9%	$ 9,500,000	$ 11,372,000			*
Housing Development Assistance Program[2]	$ 3,800,000	5.8%	$ 3,800,000	5.8%		$ 3,800,000			*
CHDO Competitive Operating Grant Program	$ 700,000	1.1%	$ 700,000	1.1%		$ 700,000			
Affordable Housing Subtotal	$ 25,372,000	38.8%	$ 25,372,000	38.8%	$ 9,500,000	$ 15,872,000	$ -	$ -	$ -
Homeless Crisis Response Grant Program[3][4]	$ 5,454,000	8.3%	$ 5,454,000	8.3%			$ 5,454,000		*
Supportive Housing Grant Program[4]	$ -	0.0%	$ -	0.0%					*
Housing Assistance Grant Program	$ -	0.0%	$ -	0.0%					*
Housing Opportunities for Persons With AIDS	$ 1,274,948	2.0%	$ 1,274,948	2.0%				$ 1,274,948	
Homelessness & Supportive Housing Subtotal	$ 6,728,948	10.3%	$ 6,728,948	10.3%	$ -	$ -	$ 5,454,000	$ 1,274,948	$ -
Community Development Program[5]	$ 17,500,000	26.8%	$ 17,500,000	26.8%	$ 17,500,000				
Economic Dev. & Public Infrastructure Program[6]	$ 10,800,000	16.5%	$ 10,800,000	16.5%	$ 10,800,000				
Water and Sanitary Sewer Program[6]	$ -	0.0%	$ -	0.0%	$ -				
Economic Development Program[6]	$ -	0.0%	$ -	0.0%	$ -				
Comprehensive Downtown Revitalization Program[7]	$ -	0.0%	$ -	0.0%	$ -				
Microenterprise Business Development Program	$ -	0.0%	$ -	0.0%	$ -				*
Community & Economic Development Subtotal	$ 28,300,000	43.3%	$ 28,300,000	43.3%	$ 28,300,000	$ -	$ -	$ -	$ -
Discretionary Grant Program	$ 1,600,000	2.4%	$ 1,600,000	2.4%	$ 1,500,000	$ -	$ 100,000		*
New Horizons Fair Housing Assistance Program	$ 50,000	0.1%	$ 50,000	0.1%	$ 50,000				
Training and Technical Assistance Funds	$ 234,000	0.4%	$ 234,000	0.4%	$ 234,000				*
Community Development Finance Fund	$ -	0.0%	$ -	0.0%					*
Resident Services Coordinator Program	$ -	0.0%	$ -	0.0%					*
Administration[8]	$ 3,090,867	4.7%	$ 3,090,867	4.7%	$ 909,807	$ 1,763,481	$ 417,579	$ -	*
Totals =	$ 65,375,815	100%	$ 65,375,815	100%	$ 40,493,807	$ 17,635,481	$ 5,971,579	$ 1,274,948	$ -

(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 Department of Development. Further, OHTF grant awards are contingent upon Controlling Board approval. OHFA administers the HDAP and ODA will administer the Resident Services Coordinator 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 Homeless Crisis Response Grant Program and Supportive Housing Grant Program replaces the Homeless Assistance Grant Program that was awarded in FY 2011.

(5) The Community Development Program includes the funding allocation for the Formula Allocation and the Neighborhood Revitalization grants (Approximately 12% of the budget).

(6) The Economic Development and Public Infrastructure Program includes Small Business Loans, Off-Site Infrastructure, and Residential Water & Sewer projects that were previously funded in separate programs.

(7) The Comprehensive Downtown Revitalization Program is being suspended for program year 2012, due to the insufficient availability of CDBG funds.

(8) Approximately 60% of the HOME and 80% of the ESG administration allocation will be awarded to grant recipients.

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Ohio Consolidated Plan Allocation Priorities

Table 5 below indicates the estimated budget allocations for 2012 for the HUD resources the state expects to receive in 2012. This chart is provided pursuant to HUD's requirement that the Consolidated Plan contain a statement of the state's allocation priorities and the reasons for such priorities. The program goals indicate how the programs cited will address a particular need and the basis for the allocation priority references a section in the Consolidated Plan where the particular need is identified and discussed. These needs were examined in the 2010-2014 Consolidated Plan Strategy, so the reference to that document is cited rather than restating it here. The 2010-2014 Consolidated Plan Strategy can be obtained from OCD and is also available on-line at http://www.development.ohio.gov/Community/ohcp/publications.htm.

Table 5: State of Ohio Allocation Priorities

Programs	2012 Allocations		
Homeless and Supportive Housing	$6,728,948	**Program Goals**	**Basis For Allocation**
Homeless Crisis Response Program	$5,454,000	To provide a continuum of housing/services to prevent persons from becoming homeless by providing homelessness prevention services and assistance; move persons from homelessness to permanent housing through the provision of housing placement, emergency shelter, direct housing, and transitional housing; and provide long-term permanent supportive housing to homeless persons with disabilities.	Ohio 2010-2014 Consolidated Plan Strategy. The allocation is determined by HUD ESG funds.
Housing Opportunities for Persons With AIDS	$1,274,948	OCD provides eligible non-profit organizations or units of local government with funds to devise long-term, comprehensive strategies for meeting the housing and supportive service needs of persons with AIDS or HIV-related diseases.	The state allocation for the HOPWA Program is the amount of funds allocated by HUD.
Affordable Housing	$25,372,000	**Program Goals**	**Basis For Allocation**
Community Housing Improvement Program	$20,872,000	To provide funding for a flexible, community-wide approach to the preservation, improvement and provision of affordable housing for low- and moderate-income persons, and to help develop local administrative capacity.	Ohio 2010-2014 Consolidated Plan Strategy.
Housing Development Assistance Program (HDAP)	$3,800,000	To support the capacity of housing development organizations and to provide financing for eligible housing projects to expand the supply of decent, safe, affordable housing for very low-income to moderate-income persons and households in the state of Ohio.	Ohio 2010-2014 Consolidated Plan Strategy.
CHDO Competitive Operating Grant Program	$700,000	To provide limited operating support to organizations to continue affordable housing development and to provide capacity building opportunities to new organizations.	Capacity building for implementation of HDAP Projects.

(continued on next page)

Table 5: State of Ohio Allocation Priorities

Programs	Allocations		
Community and Economic Development	$28,300,000	**Program Goals**	**Basis For Allocation**
Community Development Program	$17,500,000	To provide communities with a flexible housing and community development resource that can be used to address locally identified needs that are eligible CDBG activities and qualify under the national objective of Low- and Moderate-Income Benefit or Elimination of Slum and Blight.	Ohio 2010-2014 Consolidated Plan Strategy.
Economic Development & Public Infrastructure Program	$10,800,000	To create and retain permanent, private-sector job opportunities, principally for low- and moderate-income persons, through the expansion and retention of business and industry in Ohio communities. The creation of a safe and sanitary living environment for Ohio citizens, through the provision of safe and reliable drinking water and proper disposal of sanitary waste.	Ohio 2010-2014 Consolidated Plan Strategy.
Comprehensive Downtown Revitalization Program	$0	To assist in the revitalization of Central Business Districts, aid in the elimination of slums or blight, create and retain permanent, private-sector job opportunities, and implement the National Trust for Historic Preservation's Four-Point Main Street Approach to downtown revitalization.	Ohio 2010-2014 Consolidated Plan Strategy.
Other Programs	$1,884,000	**Program Goals**	**Basis For Allocation**
Discretionary Grant Program	$1,600,000	To provide a means to fund worthwhile "targets of opportunity" projects and activities that do not fit within the structure of existing programs, and to provide supplemental resources to resolve immediate and unforeseen needs.	Based on identified community needs and historical demand for funds.
New Horizons Fair Housing Program (1)	$50,000	To provide funds to units of local government or consortia to affirmatively further fair housing in addition to activities undertaken with their minimum fair housing program requirements, based on an assessment of local needs.	
Training and Technical Assistance Funds	$234,000	To provide funds to intermediary organizations to conduct training and technical assistance activities.	

(1) Will be funded with dollars from previous years' CDBG allocations.

Housing, Shelter and Supportive Housing

Community Housing Improvement Program

Housing Development Assistance Program

Community Housing Development Organization Operating Grant Program

Homeless Crisis Response Program

Supportive Housing Program

Housing Assistance Grant Program

Housing Opportunities for Persons With AIDS Program

Housing Production Goals for 2012

The following two tables indicate the estimated housing production goals for 2012. Table 6 indicates the number of housing units or households that will be assisted during the upcoming year, and Table 7 indicates the HOPWA production goals. These figures are based on historical production and the actual outcomes may vary somewhat from these figures. The goals for providing permanent housing for homeless persons and families are integrated into the Continuum of Care actions steps on pages 108-113.

Table 6: Housing Production Goals for 2012

Category of Housing Assistance		Annual Estimated Production*
Rental	Units Constructed / Added to Housing Stock	500
	Units Rehabilitated / Preserved to Standard	250
	Rental Assistance Provided to Tenants	200
Owner	Units Constructed / Added to Housing Stock	25
	Units Rehabilitated / Preserved to Standard	500
	Units Repaired	500
Homebuyer	Homebuyers assisted with acquisition of units	200
	Non-Homeless Special Needs Households	50
	Homeless Persons or Families	25

* Numbers are units, households persons or families, as applicable.

Table 7: HOPWA Production Goals for 2012

Category	Annual Goals
Short term rental / housing assistance	785
Facility-based housing	30
Housing development / information and counseling	114
Supportive Services	1,467

1. Community Housing Improvement Program (CHIP)

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

Total Funds: Approximately $20,870,700. Approximately $9.5 million in CDBG funds will be combined with approximately $11.3 million of HOME Investment Partnerships Program funds and SFY 2012 Ohio Housing Trust Funds (to be determined). CHIP funds will be distributed in one competitive funding round. A community is allowed to submit only one application in any application round.

Grant Ceiling: $500,000.

Eligible Jurisdictions: Eligible jurisdictions include (see listing of all eligible jurisdictions in Table 8, on page 20). Note: Under Section 703.06 of the Ohio Revised Code, the Ohio Secretary of State's office reviews the 10-year Census report and verifies the population totals of all municipalities and villages. The full listing of all city and village classifications can be viewed at http://www.sos.state.oh.us/SOS/mediaCenter/2011/2011-04-13.aspx:

- non-entitlement/non-participating jurisdictions (cities and counties) with an approved Community Housing Improvement Strategy (CHIS) and CHIP Policy and Procedures Manual (eligible to receive CDBG and HOME funds);

- non-entitlement cities and counties that are part of a participating jurisdiction consortium, as defined by the HOME Program regulations, with a U.S. Department of Housing and Urban Development-approved Consolidated Plan, an approved Strategies Element - Section 4 of the CHIS and an approved CHIP Policy and Procedures Manual (eligible to receive CDBG funds (eligible for a maximum CHIP award of $250,000)); and

- entitlement/non-participating jurisdictions (counties and cities) with an approved Consolidated Plan, an approved Strategies Element - Section 4 of the CHIS and an approved CHIP Policy and Procedures Manual (eligible to receive HOME funds). (see Geographic Distribution section beginning on page 101 for CDBG Entitlement and HOME Participating Jurisdictions).

Eligible Activities:

Primary Housing Activities

Private Owner Rehabilitation
Rental Rehabilitation
Homeownership (formerly Down Payment Assistance/Rehabilitation)
Acquisition/Rehabilitation/Resale
Home Repair***
Home Repair – Septic***
New Housing Construction*
Homelessness Prevention (also known as Emergency Monthly Housing Payment)*
Tenant-Based Rental Assistance*

Supportive Activities

Clearance/Demolition**
Acquisition*
Relocation Payment/Optional Relocation (not linked to a primary housing activity)
Code Enforcement*
Planning (not to exceed $10,000)

Public Service (not to exceed 15% of the grant) (e.g. Homebuyer Education, Family Self-Sufficiency Program, Home Maintenance Training)
Equipment Acquisition (Tool Loan Program)*

Administration Costs

Fair Housing

* Special restrictions on using CDBG funds for this activity apply.
** Must be related to a specific project linked directly to the provision of land required by a housing development activity or redevelopment activity.
*** Home Repair and Home Repair Septic activities are limited to a combined request of $125,000 per grant.

NOTE: With public service eligible activities such as counseling, they can be funded one of two ways. Either as a part of the primary activity to which the activity is linked (homeownership, for example) or as a separate, stand-alone activity as a public service. However, remember that counseling and other soft costs cannot be included in the tenant-based rental assistance.

At its discretion, the state may substitute funding sources, where appropriate.

Application Timing:

Submission: April 2, 2012
Grant Award: September 1, 2012

Administrative Costs: A maximum of 12% of the total grant request may be budgeted for eligible general administrative activities. The HOME Program administrative budget amount is limited to 10% of the total HOME Program funds requested. Fair housing activities may be included in the CDBG administrative funds request. Eligible administrative costs are identified at 24 CFR 570.206 for CDBG funds and 24 CFR 92.207 for HOME Program funds.

All implementation and other soft costs related to work completed on a specific unit meeting a national objective must be paid for in one of two ways: (a) these costs may be charged to the unit, or (b) these costs may be charged to administration. All implementation or soft costs associated with projects that do not meet a national objective must be charged to administration. Eligible soft costs for the CDBG Program are defined at 24 CFR Part 570.202(b) (9) and for the HOME Program at 24 CFR 92.207(b).

Program Income: Program income derived through the administration of these funds may be retained by the grantee. However, all CDBG program income must be used for a primary CDBG housing activity, and all HOME Program income must be used for an eligible HOME Program activity. The use of program income must comply with the OCD Program Income Policy at http://development.ohio.gov/cms/uploadedfiles/CDD/OHCP/Attachment12-ProgramIncomePolicy.pdf and applicable Federal and State laws and regulations. OCD reserves the right to require that grantees that have program income account balances spend those funds rather than being granted additional funds.

Local Program Period: FY 2012 Community Housing Improvement Program grantees must complete their programs according to the following deadlines: (1) all activities (except audit and balance of administration) must be completed by the end of the 26th month, following the grant agreement date; (2) all drawdown requests must be submitted to OCD by the end of the 27th month; and (3) all funds must be disbursed and expended, and the final performance report must be submitted by the end of the 28th month. Note that this new program period began with the FY 2009 CHIP awards and is an increase from previous years in the length of the work completion period by two months. Audit(s) of this grant must be conducted in accordance with OMB Circular A-133, described in the Ohio CDBG Program Financial Handbook.

Program Beneficiaries: At least eighty percent (80%) of the CDBG grant funds and all of the HOME funds must be budgeted for activities benefiting low- or moderate-income households.

Community Housing Improvement Strategy (CHIS): Prior to the submission of a CHIP funding application, each applicant must have an approved Community Housing Improvement Strategy or, for Entitlement Communities, an approved Consolidated Plan based on 2000 Census data and the Strategies element (Section 4) of the CHIS. The Strategy must have been submitted along with a copy of the community's Policy and Procedure Manual by November 2, 2011 in order for the community to be eligible to apply for FY 2012 CHIP funding. Instructions for the CHIS and Policy and Procedure Manual may be found at the following OCD website: http://development.ohio.gov/Community/ohcp/CommunityHousingImprovementStrategyTools.htm

Eligible Activities Limited to CHIS Defined Region: Because communities receive CHIP funds to address the local housing needs as defined in their approved CHIS, OCD expects CHIP services to be delivered within the applicant community's jurisdiction. However, CHIP services may be delivered outside of the applicant community's CHIS jurisdiction provided that sufficient justification is present in the application. Also, evidence of agreement with the adjacent jurisdiction must be present in the application. When services are proposed outside of the applicant community's CHIS service area, a minimum of 51% of each CHIP activity must be provided within the CHIS service area. Examples would be for housing projects that require a specific location such as special needs housing projects that may need to be located near transportation services and health care facilities or for tenant-based rental assistance when the bulk of the rental units are outside of the jurisdiction. These special cases should be identified within a community's approved CHIS and in the project description in the funding application.

Fair Housing Requirements: Communities receiving CHIP funds must meet Fair Housing requirements as described in the Local Government Certifications to the State (see the OCD Policies section of this document).

Prior Funding Threshold: CHIP grantees that successfully competed for CHIP funds during the last funding cycle will be ineligible to apply for CHIP funds in the following funding cycle. For example, if a community received CHIP funding in FY 2011, it will be ineligible to apply for CHIP funding in FY 2012.

Tenant-Based Rental Assistance: Consistent with the state's Consolidated Plan goal of providing a continuum of care in housing assistance, the state will offer Tenant-Based Rental Assistance opportunities. The state will allow communities to establish a local Tenant-Based Rental Assistance Program through the state's decentralized CHIP. The state will only fund applicants if:

1. The need for tenant-based rental assistance has been identified as a need through the local planning process, and/or is part of the jurisdiction's local housing strategy, and describes the local market conditions that support the need for this type of assistance; and

2. Families or individuals provided with HOME tenant-based rental assistance are below 50% of the area median income and selected on the basis of either A or B, or C as follows:

    A. The Section 8 waiting list of a Public Housing Authority (PHA) operating within the jurisdiction of the applicant based on preferences established by the PHA.

    B. A waiting list established by the participating jurisdiction based on the established Federal Preferences and/or local preferences.

    C. Eligible families that currently reside in units that are designated for rehabilitation under the HOME Program without requiring them to be placed on the PHA waiting list.

Resale/Recapture Requirements

Communities receiving CHIP grant awards shall identify in their Policy and Procedure Manual their selection of using the recapture or resale affordability provisions as outlined in 24 CFR 92.254. Once chosen, and approved by OCD, communities shall abide by their selection for all applicable CHIP-funded projects (see page 142 Program Specific Requirements).

Rating Criteria:

All applications are reviewed, rated, and scored based on the criteria outlined below. Applications will achieve a score between 0-100 points. The process is competitive and designed to rank order the communities to be offered funding with the limited amount of CHIP funds available.

Needs (20 total points)

Community Distress (10 points): Assessment of a community's level of distress will be based on the following: trends in the current census data related to LMI household needs across the state such as percent units overcrowded, percent units lacking complete plumbing, percent units built before 1939, percent households paying more than 35% of income for housing, number of persons in poverty, and per capita income; and trends regarding distress factors in the current housing market, such as foreclosure rates, vacant unit rates, etc.

Planning (10 points): Assessment of the community's pre-application planning process based on required documentation submitted in the application (i.e., required number of Housing Advisory Committee (HAC) meetings held with participation from the required membership, HAC discussion of the required topics; HAC determination of final recommendations for housing activities.

Capacity (30 total points)

Administrative Capacity (30 points): The adequacy of the proposed administrative plan; the degree of consistency with application requirements; the applicant's/consultant's experience and capacity for implementing the proposed activities, and the adequate filling of the required roles to successfully administer a grant.

Performance (25 total points)

Past Performance (25 points): Past performance will include performance in administering the following aspects of OCD-administered housing programs: compliance with the grant agreement(s); program regulations and policies; resolution of monitoring and/or audit findings; and progress in the completion of activities.

Impact (25 total points)

Program Design/Impact (15 points): The community's demonstrated readiness to proceed with the proposed activities, the community's efforts to give priority in funding to the populations and areas where they will have the most positive impact, and the consistency between the community's application and the proposed program design, federal and state program requirements, and the application requirements.

Cost Effectiveness (5 points): The degree to which the cost of an outcome (i.e., dollars per unit repaired, dollars per household assisted, etc.) is reasonable and appropriate for the proposed activity, and the degree to which the ratio of administrative funds and program activity funds are reasonable and appropriate.

Leverage and Coordination (5 points): The amount of non-CHIP funds committed to the activities in the application and the extent to which the proposed activities integrate and coordinate with other local programs, funds and activities.

CHIP Amendment/Extension Policy

Situations Requiring an Amendment:

1. An amendment to an executed grant agreement **is required** if the grantee is proposing a new activity. A public hearing is required for a new activity and the hearing must be preceded by a 10-day public notice. Because the CHIP is a competitive program and activities must be consistent with those described in the community's CHIS, OCD does not allow amendments to CHIP grants for this purpose, except in extreme circumstances.

2. An amendment to an executed grant agreement **is required** if there is a substantial change in an approved project or activity scope, location or design, number and type of beneficiaries, anticipated accomplishment, or national objective. In addition, a public hearing is required and must be preceded by a 10-day notice.

3. An amendment to an executed grant agreement is required if the amount most recently approved by OCD for any previously approved activity is being increased or decreased by more than $5,000 or 10%, whichever is greater. These thresholds must be applied to both the activity from which the funds are to be removed and the activity to which the funds will be added. Increases or decreases less than this threshold will be reconciled during the closeout process. The administration cap may not be exceeded, and activity dollars may not be moved to administration without an amendment.

4. Activity outcomes may also be reduced by up to 10% without an amendment as a result of moving funds from one activity to another in order to meet an increased demand in another activity. However, outcomes may not be reduced without an amendment for other reasons, and amendments to reduce outcomes in an activity will not generally be approved by OCD. In any case, performance of the grant will generally be evaluated in future funding application reviews based upon the original grant agreement signed with OCD.

5. Amendments to extend the grant period (extensions) will generally be discouraged, and will be considered on a case-by-case basis. Extensions will only be granted to communities without ongoing funding opportunities for extreme circumstances.

   Amendments must be reviewed and approved by OCD **prior** to implementation of the proposed change.

   Due to the nature of competitive programs, grantees are discouraged from making any changes to their programs. Therefore, amendments and extensions to competitive programs will be considered during future funding application reviews.

Table 8: FY 2012 CHIP CDBG Eligible Communities (eligible for maximum award of $250,000)

Trumbull County
Cortland

FY 2012 CHIP HOME Eligible Communities (eligible for maximum award of $250,000)

Bowling Green	Kent	Newark
Elyria	Lancaster	Sandusky
Fairborn	Marietta	Steubenville
		Warren County

FY 2012 CHIP CDBG and HOME Eligible Communities

Counties

Adams	Coshocton	Hardin	Lucas	Paulding	Union
Allen	Crawford	Harrison	Madison	Perry	Van Wert
Ashland	Darke	Henry	Mahoning	Pickaway	Vinton
Ashtabula	Defiance	Highland	Marion	Pike	Washington
Athens	Delaware	Hocking	Medina	Portage	Wayne
Auglaize	Erie	Holmes	Meigs	Preble	Williams
Belmont	Fairfield	Huron	Mercer	Putnam	Wood
Brown	Fayette	Jackson	Miami	Richland	Wyandot
Carroll	Fulton	Jefferson	Monroe	Ross	
Champaign	Gallia	Knox	Morgan	Sandusky	
Clark	Geauga	Lawrence	Morrow	Scioto	
Clermont	Greene	Licking	Muskingum	Seneca	
Clinton	Guernsey	Logan	Noble	Shelby	
Columbiana	Hancock	Lorain	Ottawa	Tuscarawas	

Table 8 (continued) FY 2012 CHIP CDBG and HOME Eligible Communities

Cities

Amherst
Ashland
Ashtabula
Athens
Aurora
Avon
Avon Lake
Beavercreek
Bellbrook
Bellefontaine
Bellevue
Belpre
Brunswick
Bryan
Bucyrus
Cambridge
Campbell
Canfield
Celina
Chardon
Chillicothe
Circleville
Clyde
Columbiana
Conneaut
Coshocton
Defiance
Delaware
Delphos
Dover
East Liverpool
Eaton
Findlay
Fostoria
Fremont
Galion
Geneva
Girard
Greenville
Heath
Hillsboro
Hubbard
Huron
Ironton
Jackson
Kenton
Logan
London
Marion
Martins Ferry
Marysville
Maumee
Medina
Milford
Mount Vernon
Napoleon
Nelsonville
New Carlisle
New Philadelphia
Niles
North Ridgeville
Northwood
Norwalk
Oberlin
Ontario
Oregon
Orrville
Pataskala
Perrysburg
Pickerington
Piqua
Port Clinton
Portsmouth
Powell
Ravenna
Rittman
Rossford
Salem
Sheffield Lake
Shelby
Sidney
St. Clairsville
St. Marys
Streetsboro
Struthers
Sylvania
Tiffin
Tipp City
Toronto
Troy
Uhrichsville
Upper Sandusky
Urbana
Van Wert
Vermilion
Wadsworth
Wapakoneta
Washington C.H.
Waterville
Wauseon
Wellston
Williard
Wilmington
Wooster
Xenia
Zanesville

2. Housing Development Assistance Program

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

Total Funds: The HDAP will use the following resources for providing financial assistance to eligible developments. Funds will be awarded in the form of a loan or a grant.

HOME Investment Partnerships Funds: $3.8 million Federal regulations relating to environmental review, federal wage rates, federal accessibility, federal acquisition and relocation laws (URA and Section 104(d)), long-term affordability, etc. apply.

Ohio Housing Trust Fund (OHTF): (amount to be determined) The Ohio Housing Trust Fund provides gap financing to developments predominantly serving low-income households with incomes at or below 50% of an area's median income. The Housing Trust Fund gives preference to those developments that benefit households with incomes at or below 35% of the area median income for the county where the development is located, as established by the U.S. Department of Housing and Urban Development (HUD).

Ohio Housing Trust Fund resources may also be used for homeownership developments serving households with incomes at or below 80% of the area median income. At least 50% of all OHTF funds are to be allocated to rural areas and small cities that would not be eligible to participate as a participating jurisdiction under the HOME Investment Partnerships Program. State prevailing wages and associated laws are applicable.

The resources described above will be allocated for preservation of at-risk affordable housing, the creation of new affordable rental housing, and the development of affordable homeownership opportunities through the following programs administered by OHFA: Housing Credit Gap Financing, (both competitive and non-competitive), and Housing Development Gap Financing (HDGF).

Funding Requirements for All Gap Financing Awards:

1) **Reporting and Record Keeping**: The applicant will be responsible for compliance with applicable implementation, reporting and record keeping requirements associated with the HOME Investment Partnerships Program, OHFA, and state regulations.

2) **Environmental Review Requirements**: Developments may be funded with Ohio Housing Trust Fund (OHTF) or HOME Investment Partnerships dollars at the discretion of OHFA. Best efforts will be made to fund scattered site developments (10 or more non-contiguous parcels) with OHTF dollars. OHTF-funded developments are not subject to the environmental review requirements as outlined at 24 CFR Part 58; however, the recipient of funds must provide the following information to OHFA:

   - A Phase I environmental site assessment that meets American Society of Testing and Materials (ASTM) standards (E1527-00 or most current at application). In addition, the Phase I shall address any environmental conditions (on or off-site) which, while not meeting the ASTM definition of a recognized environmental condition, could pose a threat to the health or safety of residents at the site. Such potential environmental conditions include, but are not limited to, asbestos, lead paint, mines, air quality, and explosion hazards (above ground storage tanks, overhead pipelines, and oil/gas wells). The ASTM minimum search distances for government records must be met for each site and the Phase I shall draw justified conclusions on the potential

impact on the project sites. The Phase I firm shall provide recommendations regarding all identified environmental conditions.

- Developments funded with OHTF dollars, which do not have an allocation of housing credits will be required, at a minimum, to provide a Mini-Environmental Review. The requirements for this review will be significantly less than a Phase I assessment. However, the information will be reviewed by an environmental consulting firm to determine if the applicant needs to provide a full Phase I review.

  At OHFA's discretion, exceptions to requiring the Phase I Environmental may be made for small developments.

Each development could be subject to a 24 CFR Part 58 Environmental Review, regardless of the source of funds committed to the project. All developments may be subject to an environmental review, regardless of source of funds committed to the project.

OHFA will allocate $1,000 per development funded with HOME funds for the publication of the environmental review Public Notice.

3) **Determination of and Requirements for Assisted Units:** The amount of HOME/HDAP funds will be used to determine the number of units that are HOME assisted and must comply with HUD's High- and Low-HOME rent requirements. OHFA will take the total amount of HOME and HOME-match dollars (HDAP funding, regardless of the source, plus local dollars), divide this by the total eligible development costs, multiply by the total number of units in the development and round up to determine the number of assisted units that must comply with HOME rent restrictions. OHFA may have to increase the number of HOME assisted units if: (1) the total subsidy per assisted unit exceeds the 221(d)(3) limits, and/or (2) the total subsidy per assisted unit exceeds the total development cost per unit.

If there are five or more units assisted by HOME dollars (state and local) in the development, 20% of the assisted units will be restricted to the Low-HOME rents. Assisted units will also be distributed evenly among various unit sizes in the development. OHFA reserves the right to require that units assisted through the HDAP be distributed evenly between newly constructed units and rehabilitated units. The applicant can elect for those units to be fixed units or floating units. For homeownership developments, all units will be considered assisted.

4) **Rehabilitation Standards**: Developments that involve the rehabilitation of structures must adhere to the OCD Residential Rehabilitation Standards (RRS). Refer to the Office of Community Development RRS Handbook, or other standards agreed upon by OHFA and OCD.

5) **Lead-Based Paint Standards:** All housing developments designed to rehabilitate pre-1978 structures must adhere to the Ohio Department of Development's Lead-Based Paint Guidelines.

6) **Relocation Standards:** All developments, regardless of funding source, that involve the rehabilitation of existing occupied units must submit a Relocation Plan or strategy for rehabilitation that outlines the plan to work with the tenants in place. If the development receives federal funds, the plan must meet the requirements set forth in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. If the development involves acquisition, the applicant must supply the "Real Property Acquisition and Relocation Certifications and Voluntary Acquisition Forms" for the project.

7) **Timeline:** The recipient must be cognizant of four important dates in the funding agreement:

Developments funded in part with housing credits:

i. **Commencement Date:** The effective date of the agreement**.** This is the date the Ohio Housing Finance Agency signed the agreement.

ii. **Construction Completion Deadline:** Housing credit placed-in-service deadline. The development must be completed by this date.

iii. **Final Draw Deadline:** The date the recipient must submit its final draw request no later than 30 days following construction completion.

iv. **Final Performance Report Deadline**: The earlier of:
   a) 120 days following the Rehab Construction Completion Deadline (for both New Construction and Rehab) or
   b) Submission of the 8609 request.

Developments funded without housing credits:

1. **Commencement Date:** The date the agreement is signed by the Ohio Housing Finance Agency.

2. **Construction Commencement Date:** Within 12 months of the date the agreement is signed.

3. **Construction Completion Deadline:** Within 24 months of the Commencement Date.

4. **Final Draw Deadline:** 30 days following the Construction Completion Date. This is the date that the recipient must submit its final draw request.

5. **Final Performance Report Deadline:** within 120 days of the Construction Completion.

8) **Changes to Approved Applications:** OHFA is to be notified in writing of all changes, financial or otherwise, relating to an application for financial assistance of an approved development. Failure to notify OHFA may jeopardize the applicant's ability to receive assistance in the future. If there are any substantive changes to the development prior to the execution of the Funding Agreement, OHFA may require resubmission of the application.

9) **Eligible/Ineligible Applicants:** Applicants can be private for-profit, not-for-profit developers/owners, or public housing authorities. Local governments are not eligible for funding. For developments owned by partnerships (limited liability corporations, etc), to qualify for financing terms available to not-for-profit organizations, the majority/controlling general partner interest must be held by a not-for-profit (for-profit affiliates of not-for-profit parent corporations qualify as a not-for-profit in a partnership situation). To request financing terms available to not-for-profit organizations, the applicant must provide evidence of IRS 501(c)(3) or 501(c)(4) status. To be eligible for funding, religious organizations must meet the provisions in 24 CFR Part 92.257 as amended by HUD September 30, 2003. In addition, applicants applying for funding in the Housing Development Gap Financing round must be Ohio-based organizations.

10) **Ineligible Properties/Developments:** The HDAP cannot assist developments (facilities) that:

- ❑ Are identified as hospitals, nursing homes, sanitariums, life-care facilities, retirement homes (if providing significant services other than housing are mandatory for residents), employer housing, mobile homes and student housing; or
- ❑ Have received a new allocation of tax-exempt bonds (private purpose volume cap) for new construction.

OHFA reserves the right to evaluate developments that have received other forms of federal subsidy (such as Capital Advance Grants through HUD 202 or 811; HOPE VI; Public Housing Authority funds; Rural Development 515 financing with new construction; or FAF funds) and determine what amount, if any, the development needs to be financially feasible.

Developments that have previously received an award of funds through the Housing Development Assistance Program may not be eligible to receive additional funds. The Agency reserves the right to evaluate such developments in an appeal process to determine the facts and circumstances that necessitate the need for additional funds and to ensure projects are not over subsidized.

OHFA would prefer that HDAP resources be used to provide new opportunities for affordable housing or to preserve affordable housing for the residents of Ohio. Therefore, OHFA reserves the right to determine whether or not the rehabilitation of existing affordable renter-occupied housing is eligible. For this purpose, 'affordable' is defined as housing which, as a result of one of the funding sources, the population being served or the area in which the project is located, is required to maintain below market-rate rents on any of its units. Applicant's requesting funds for this purpose must be prepared to present compelling reasons why HDAP funds should be used to rehab an existing affordable development.

11) **Projects per Developer:** Developers may submit more than one proposed development per year based on the capacity of the organization to implement multiple and/or simultaneous projects. OHFA reserves the right to require further information and to make a determination as to the capacity of an organization to carry out multiple developments, which will include status and progress on projects previously using any resources provided by OHFA. OHFA may also limit the amount of HDAP awarded to any single developer.

The Agency reserves the right to combine the costs for developments located in close proximity to each other and share similar attributes such as project type, construction style, and development team.

12) **Cost Certification:** At the completion of construction, each development will be required to obtain and submit a cost certification prepared by an independent certified public accountant or other comparable documentation approved by OHFA.

13) **Fee Limits:** Developer's fee for applications submitted in connection with gap financing awards must be consistent with the limits established in the Qualified Allocation Plan (QAP), HDGF or other funding guidelines.

14) **Public Notification:** Applicants intending to develop rental housing (including lease-purchase) must comply with the ORC §175.07 pertaining to public notification.

15) **A. Rental Developments (including Preservation Developments) - Loans:**

- 2% interest rate, or a negotiated rate agreed upon by OHFA and the project ownership based on the project's cash flow.
- Loan will mature at the end of the affordability period. The affordability period is defined as the minimum term required in CFR 92 and any extended affordability period imposed by OHFA.

- Collateral will be a subordinate mortgage position, OHFA prefers a second or shared second position. If a lower position is necessary, the applicant should indicate so in the application along with an explanation and supporting documentation.
- Collateral for Section 8 projects participating in the Mark-to-Market program: OHFA will require collateral in the portion of the owner's position to the extent that the HDAP assistance is used to fund the owner's 20% up-front rehabilitation contribution required by the Mark-to-Market program.
- Payments will be based on a percentage of the project's cash flow as defined by OHFA. During the entire term of the loan, repayments to the HDAP-Recipient for the HDAP loan to the project are also excluded from the definition of cash flow (except to the extent that the payment ultimately flows to OHFA). Any remaining balance on the HDAP loan is due as a balloon payment at the end of the term or upon sale, whichever is first. OHFA may agree to subordinate to other government investors (RD or HUD) and accept payments consistent with their terms. However, this will be evaluated on a case-by-case basis
- Loan interest will accrue and repayment obligations will start following the project close-out, regardless of the Placed-in-Service date. Closed out means the “Assisted” units have been leased and the appropriate documentation as been provided to and approved by OHFA.
- Loans will be made to the HDAP recipient as the project's general partner, managing member or equivalent. The recipient may loan the funds to the project at a commercially reasonable rate. OHFA reserves the right to designate which general partner/managing member/owner, if more than one, will be the recipient.

16) B. Rental Developments (including Preservation Developments) - Grants:

Grants must be requested and are available only when all of the following conditions are met:

- The eligible applicant is the controlling general partner and is a 501(c)(3) or 501(c)(4) not-for-profit (for-profit affiliates of not-for-profit parent corporations qualify as a not-for-profit in a partnership situation).
- At least 20% of the units in the development will be occupied by and affordable to households at or below 35% of the Area Median Income.
- The recipient must treat the funds as a grant for tax purposes. If the recipient is the project, it will receive an IRS form 1099.
- The recipient cannot loan the funds to the development but must treat it as a grant or a capital contribution.

Developments that meet both the requirements established by OHFA for Permanent Supportive Housing and the above noted conditions are also eligible to request a grant.

For Housing credit developments that request a direct grant, the HDAP funds may be included in eligible tax credit basis if the funds are a general partner's capital contribution ***and*** provided that the development can provide a tax-opinion certifying the funds as part of eligible basis. The development must still meet all of the above noted requirements to be eligible for a grant. However, when considering eligibility for a grant, OHFA will apply the regulations governing the funds awarded (HOME or OHTF) when considering how the recipient passes the award onto the development.

17) Transitional Housing:

Transitional housing is eligible for funding if supportive services appropriate to the population proposed to be served are provided and the applicant designates a minimum occupancy period for residents.

18) Development Design Requirements:

Rental

Developments located in **PJ** areas must show that at least **40%** of the development's affordable units must be occupied by and affordable to families at or below 50% AMI for the entire affordability period. Developments located in **Non-PJ** areas must show that at least **35%** of the development's affordable units must be occupied by and affordable to 50% AMI households for the entire affordability period. Affordable units are defined as units that are affordable to households at or below 60% of the AMGI.

Rents established by project-based contracts may increase as allowed by that project-based assistance. Existing tenants may not be displaced to achieve the minimum percentage of occupancy by very low-income households. Occupancy in up to 60% of the development by households with higher incomes is to occur over time; at turnover, units may be leased to higher income households.

Housing Credit Gap Financing: Projects located in PJ areas must show that a minimum of 10% of units will be affordable to and occupied by households at or below 35% of area median income. Projects not located in PJ areas must show a minimum of 5% of units will be affordable to and occupied by households at or below 35% of the area median income.

NOTE: Existing occupancy and/or affordability restrictions imposed because of the project-based federal assistance may take precedence over OHFA requirements.

Homeownership

All units must be affordable to and occupied by households at or below 80% of the AMGI.

19) Programs:

A. Housing Development Gap Financing (HDGF)

The HDGF provides gap financing to those developing housing without using housing credits or multifamily tax-exempt (private activity) bonds. Applicants may apply for gap financing for rental development, preservation of existing affordable housing or homeownership development.

1. Project Preservation:

Project preservation is designed to assist developments that are currently affordable, but are at risk of no longer being affordable due to a loss of subsidy or the need for rehabilitation. Applicants must be able to evidence the need for rehabilitation to address health and safety violations in addition to other major deficiencies and that existing reserves are unable to meet the needs of the development.

Eligible Applicants

Applicants in the HDGF program must be Ohio-based organization and must be in the process of acquiring the project. If the applicant's wholly owned or partially owned subsidiary, partnership or any other legal entity owned by the applicant or

partnered with the applicant, have held valid legal title or leasehold interest in the property, or been responsible for its management or maintenance, they must be able to demonstrate that the need for any rehabilitation is not through any fault of the ownership. If the applicant took over management and/or ownership of the property within the past 24 months at the request of HUD, RD investor or a lender due to the prior owner's/manager's mismanagement of the property, this would not apply.

Eligible Activities:

Funds may be used for acquisition costs, hard and soft development costs of the rehabilitation, including but not limited to contractor overhead and profit, architect/engineering fees, and developer fees.

Funding Limit:

Up to $500,000 based on the need of the project.

OHFA reserves the right to exceed this limit based on the need of a given project determined through a financial underwriting analysis.

2. Homeownership

Eligible Applicants:

Ohio-based Non-profit developers and Ohio public housing authorities proposing to develop affordable for-sale homes.

Eligible Activities:

OHFA will prioritize homeownership development that is part of a local community revitalization effort (rehab and new construction), where the need is demonstrated. HDGF resources may only be applied on the development budget towards non-related third party acquisition, hard costs associated with new construction or rehabilitation, developer fees, and eligible soft costs associated with the actual development of single-family home ownership developments that create housing opportunities. The development budget can include up to $500 per unit (which will not be counted as part of the developer's fee) payable at the buyer's closing paid by a source other than HDGF to fund homeownership counseling. Renovations of owner-occupied units are not eligible. Reasonable real estate broker fees will be considered an eligible development budget expense, if such service is being provided by an unrelated third party. OHFA will require supporting documentation from the applicant to demonstrate the need for the expense.

The residential income must support the development and operating expenses of the residential portion.

Eligible Housing Types:

HDGF funds can be used to fund single-family residences.

Ineligible Housing Types:

HDGF Resources for the homeownership program may **not** be utilized to allow for the acquisition of multiple units including duplexes, triplexes, etc. or mobile homes. Multiple units will be considered eligible for rental development only and must be funded within the rental development component of this program. Property cannot

be transferred to the low/moderate-income buyer with any in-force ground leases or land contracts on the property.

EXCEPTION: Land Trusts will be eligible to participate in HDGF and transfer property with in-force ground leases providing the following conditions are met:

(1) OHFA legal staff reviews all closing documents homebuyers may be required to sign. OHFA reserves the right to review the documents and either approve them to be used for all homebuyers, or to review them on a case-by-case basis.

(2) Any homeowner receiving subsidy under HDGF may sell the improvements and assign the lease to ***any*** interested party if there are no income qualified homebuyers available six months after a 60-day land trust purchase option has expired. If no purchase option exists, the homebuyer may assign the lease to ***any*** interested party if there are no income qualified homebuyers available six months after the homebuyer has notified the land trust of their intent to sell. Any sale is subject to the recapture or resale as defined by HOME regulations. However, the option of resale or recapture must be selected before the assistance is provided to the homebuyer.

(3) The HDGF recipient will not assess unreasonable leasehold fees above fair market or use value of the land when a non-income qualifying homebuyer is being considered. OHFA reserves the right to determine whether or not leasehold fees may be assessed to a homeowner. Leasehold fees will be considered part of the developer fee unless the Land Trust can demonstrate why this fee should be considered anything else.

Manufactured Homes are not eligible.

Development Design Requirements:

The homebuyers' first mortgages must be at an amount that does not exceed a 100% combined loan to value ratio at commercially reasonable terms and rates. If the proposed commercial mortgage has a rate that is more than 200 basis points higher than the current OHFA Mortgage Revenue Bond program, OHFA will deem the mortgage as being commercially unreasonable. OHFA may implement procedures encouraging applicants to consider using OHFA's first-time homebuyer program when available.

OHFA may place a cap on non-third party fees that may be charged a homebuyer, whether paid by the borrower or seller (including, but no limited to, underwriting fee, processing fee, commitment fee, etc., but excluding fees assessed by OHFA if the homebuyer is using OHFA's first-time homebuyer Program).

The purchase price of the home ownership unit must not exceed the appraised fair market value (FMV) of the property, and the unit must be the principle residence of the homebuyer for the entire affordability period. The applicant will be required to submit as-is and after rehab appraisals for rehabilitation units and FMV appraisals for new construction units. Market approach appraisals for all units under site control should be submitted with the application. **Appraisals must be completed by an Ohio state licensed appraiser**.

At a minimum, each participating homebuyer must contribute $500 of their own funds to the down payment.

One hundred percent of the home ownership units assisted with HDGF resources must be **affordable to and occupied by** households whose income, at the signing of the purchase agreement, is at or below 80% of the area median income for the

county where the home is located, as established by HUD. HDGF resources may not be used to assist households with incomes greater than 80% AMI.

Recipients should strive to keep the total household housing payment, including principal and interest on any hard debt(s), taxes, insurance (PITI), **and** utilities, at the time of the buyers' purchase at 30% of the gross median household income. The total housing expense may go as low as 25% or as high as 35% of the gross median household income; however, OHFA may require supporting documentation from the recipient. For households earning below 50% of the area median income, the total housing payment must be between 20 and 25% of the buyer's gross median household income, the HDGF recipient must demonstrate additional subsidy that makes the home affordable to this income group. The monthly PITI payment is assuming one person per bedroom.

OHFA reserves the right to evaluate the need for affordability subsidy for homebuyers; however in most cases this will not exceed 30% of the Fair Market Value of the home. OHFA may require supporting documentation to evidence that a home sale is not being over subsidized. OHFA may impose limits on the amount of affordability subsidy provided to homebuyers.

OHFA will evaluate the need for development subsidy on a case-by-case basis. However, generally speaking, development subsidy should not exceed $20,000 per unit or 50% of the HDGF award, whichever is less. Exceptions to this will be reviewed on a case-by-case basis when the applicant can demonstrate (1) that permanent financing is available at a below market rate (for example through the USDA) so that additional affordability subsidy is not necessary and that the entire HDGF award would be necessary for development subsidy, or (2) specific units have a demonstrated need for additional development subsidy (e.g. infill sites, accessibility issues). Any HDGF funds not used as development subsidy and not used as affordability subsidy must be returned to OHFA.

OHFA may allow the HDGF award to be allocated in a manner that is not a straight pro-ration provided the applicant can demonstrate that such an allocation is necessary.

A minimum of 8 hours of homebuyer counseling must be provided for each household purchasing a unit in the proposed development. The homebuyer-counseling curriculum must include the following topics:

a) The homebuyer decision. This element should include: analyzing initial and long-term affordability; finding the "right" house; identifying the players; making the offer and signing the contract; shopping the financing and arranging for insurance.

b) Budgeting and credit management. This element should include: establishing a savings plan and setting goals; developing and using a budget, understanding credit; building and maintaining a credit record; and understanding the consequences of default, predatory lending, and the pros and cons of refinancing.

c) The mortgage loan closing process. This element should include: understanding the pre-closing requirements; understanding the loan closing documents; and understanding the closing process.

d) Homebuyer education must contain a Fair Housing component that includes information related to potential discriminatory actions related to lending practices, insurance and real estate practices.

e) Home maintenance and repair. This element should include: developing a

maintenance plan, identifying problems and performing basic preventative maintenance; understanding basic repair safety precautions; and hiring and dealing with a contractor.

The applicant **must** identify the major provider of services for disabled persons in their community and conduct marketing and outreach in an effort to attract qualified homebuyers that need accessible features.

For subdivisions, at a minimum §**711.041, 711.05, 711.09,** and **711.10** of the Ohio Revised Code (ORC) apply. All other relevant sections are also applicable.

Funding Limits:

The Homeownership Program will award funds from the HOME Investment Partnerships Program and Ohio Low-and Moderate-Income Housing Trust Fund as follows:

- ❑ up to $450,000 per development in HUD Participating Jurisdictions (PJs), based on funding availability
- ❑ up to $550,000 per development in HUD Non-Participating Jurisdictions (Non-PJs), based on funding availability.

OHFA reserves the right to exceed these limits based on the need of a given project determined through a financial underwriting analysis.

Appraisals are required to substantiate the amount of funds requested.

No local government match requirement will be imposed on these developments.

Financing Terms:

- ❑ **Fully Forgivable Loans:**

Homeownership Developments - Loans:

- Loans will be made in the form of fully forgivable loans.
- Development subsidy will be considered a loan until the project has been completed. OHFA will require repayment of all or part of this loan if the applicant does not complete the development as described in the application.

HDGF funds used as affordability subsidy will be awarded in the form of a fully forgivable loan. Collateral will be a subordinate second mortgage on each home sold. OHFA will allow a shared subordinate second position with any other governmental agency providing funds. HDGF funds used to fund a development gap (cost to build - the fair market value (aka sale price) = the development gap) will not be included in the forgivable loan.

Where OHFA has approved the use of development subsidy only, OHFA will require either a deed restriction or a restrictive covenant to ensure compliance with a minimum affordability period.

The HDGF assistance is passed on to the homebuyer as a non-interest-bearing loan. Recaptured funds are to be returned to OHFA via the fund recipient. Therefore, the applicant must require the homebuyer to notify the organization of the intention to sell the property and the fund recipient must make a determination of whether funds must be recaptured and returned to OHFA.

Recapture Requirements:

All units will be subject to a repayment of subordinate loan proceeds. Applications for home ownership units must include a detailed description of the repayment policy and mortgage that will be placed upon each unit. All mortgage documents are subject to approval by OHFA staff and ODOD legal staff.

The HDGF loan is passed on to the homebuyer as a non-interest-bearing loan. THE SECOND MORTGAGE MUST BE FILED WITH THE COUNTY RECORDER'S OFFICE. The loan amount per home may be forgivable over a 15-year period as follows:

100% of the loan amount per home will be forgiven prorata during a 15-year period. On a limited basis, OHFA may allow any recaptured funds not due OHFA to be retained by the recipient. Such funds must be used as required in CFR 92.254(a)(5)(ii)(5).

The portion of the OHFA loan not forgiven must be returned to OHFA only upon sale of the property. If the property is sold for less than the total principal balance (primary loan + OHFA loan), based on an appraisal, OHFA will waive repayment of any shortfall owed to OHFA. In the event of foreclosure, repayment of the HDGF funds will be based on shared net proceeds, which may allow the homebuyer to recover some or all of any down payment and/or capital improvement investments.

OHFA may place a restrictive covenant or other acceptable document preventing homeowners from selling their home below market value without OHFA consent.

3. <u>Rental Development</u>

Eligible Applicants:

Ohio-based non-profit and for-profit developers and public housing authorities proposing to develop rental developments financed with source(s) other than equity generated by the syndication of low-income housing tax credits. Developments must have a minimum of four units.

Eligible Activities:

HDGF resources may only be applied on the development budget toward non-related, third party acquisition costs, hard costs associated with new construction or rehabilitation, developer fees, and eligible soft costs associated with the actual development of renter-occupied projects that create housing opportunities.

On a case-by-case basis, the cost of previously purchased land may be considered as a portion of the total costs and therefore may be eligible for reimbursement.

HDGF resources may be utilized in mixed-use buildings; however, the HDGF application must only represent the residential portion of the development. The residential income must support the development and operating expenses of the residential portion.

Funding Limits:

Total HDGF funds in the development cannot exceed 50% of the total cost of the project. OHFA may, on a case-by-case basis, agree to subsidize more than this based on the availability of local resources, the development design or the location of the project.

The HDGF will utilize funds from the Ohio Housing Trust Fund and HOME Investment Partnerships Program to fund the development of affordable rental housing. The development must constitute the creation of new affordable housing units through renovation or new construction.

- Up to $450,000 per development in HUD Participating Jurisdictions (PJs), based on funding availability.
- Up to $700,000 per development in HUD Non-Participating Jurisdictions (Non PJs), based on funding availability.
- Up to $750,000 per development for Permanent Supportive Housing.

OHFA reserves the right to exceed these limits based on the need of a given project determined through a financial underwriting analysis..

No local government match requirement will be imposed on these developments.

B. Housing Credit Gap Financing

Eligible Applicants:

Private housing developers and public housing authorities seeking competitive tax credits in the current Housing Credit program year. All applicants must be a sole general partner, controlling/managing general partner, or a general partner/managing member with a material interest in the ownership structure of at least 25%.

Funding Limits:

Total Housing Credit Gap Financing (HCGF) funds in the development cannot exceed 50% of the total cost of the project.

With HOME Investment Partnerships Program and Ohio Housing Trust Fund (OHTF) dollars, the HCGF will provide funding based on the need of a given project determined through a financial underwriting analysis.

OHFA may impose a Local Government Match Requirements. The amount of match required will depend upon the amount of federal funds received by the Participating Jurisdiction as well as the nature of the proposed development. OHFA will adopt a broad definition for what constitutes match funding, including but not limited to tax abatements, land donated by government and local HOME or Trust fund dollars.

Developments involving multifamily tax-exempt bond financing (private purpose volume cap) for the preservation of affordable housing (subject to the availability of funds):

Private housing developers and public housing authorities that receive an award of volume cap on or after July 1, 2012 for the acquisition and rehabilitation or substantial rehabilitation of an existing HUD Section 8 or USDA Rural Development (RD) project. Developments must have also received an allocation of housing credits. Applicants must be a sole general partner, controlling/managing general partner, or a general partner/managing member with a material interest of at least 25% in the ownership structure.

The development cannot have closed on the bonds prior to application. Closing "in Escrow" will be considered by OHFA to be closed.

Funding Limits:

Eligible Activities:

HCGF resources may only be applied on the development budget toward hard costs associated with new construction or rehabilitation, developer fees, and eligible soft costs associated with the actual development of renter-occupied developments that create housing opportunities or preserve existing affordable housing (acquisition costs are not eligible use of gap financing under the housing credit program).

HCGF resources may be utilized in mixed-use buildings; however, the HCGF application must only represent the residential portion of the development. The residential income must support the development and operating expenses of the residential portion.

HCGF-assisted rental units may be converted to homeownership units under the housing credit lease-purchase program. OHFA may elect to forgive one-half of the original loan and accrued interest up to the point of sale if the unit has been maintained as safe, decent and sanitary housing. The balance due will be passed on to the homebuyer as affordability subsidy. The units will be subject to the minimum affordability period equal to the remaining affordability period established by HUD if the units had continued as rental housing. The recipient will be responsible for monitoring and reporting under the current guidelines. The recipient must require the homebuyer to notify them of their intention to sell the property, and the recipient must make a determination of whether funds must be recaptured and returned to OHFA. OHFA reserves the right to request any documentation it deems necessary to determine the eligible amount of affordability subsidy, including but not limited to an appraisal demonstrating the fair market value of the property.

20) Application Review Criteria:

All HDAP applications will include a review of the application and all required supporting documentation to ensure that the development is financially feasible and meets all HOME and OHFA program requirements.

21) Fees:

Application Fee:

OHFA may elect to impose an application fee and/or a reservation fee for developments submitted in the, HDGF funding round: The nominal reservation fee will be based on threshold deficiencies, in order to encourage the submission of complete and accurate applications. A nominal, non-refundable application fee will be required to encourage applicants to submit only applications for funding on developments they believe they can complete.

Applications submitted in the housing credit round will not be assessed an application fee, but remain subject to all applicable fees assessed by other programs administered through OHFA.

Amendment/Extensions or Reinstatement to Funding Agreements: OHFA may elect to impose a $500 fee for each amendment or extension made to the funding agreement. OHFA may also elect to impose a $1,000 fee to reinstate an expired funding agreement. These fees are implemented to encourage applicants to complete developments in a timely manner and as proposed in the application.

22) Waivers

OHFA reserves the right to waive State-imposed requirements if the applicant

demonstrates compelling reason. OHFA's will review such requests on a case-by-case basis.

23) Application Review Process:

The application will be assigned to a Housing Development Analyst (HDA) who will be responsible for the application review, funding agreement processing and resolution of post-award implementation issues. OHFA RESERVES THE RIGHT TO DETERMINE THE REASONABLENESS OF ALL COSTS AND FEES ASSOCIATED WITH THE DEVELOPMENT.

Threshold Review - The threshold criteria assures that all selected developments comply with program requirements. Applications that do not meet the threshold requirements will not be considered for funding. ***The only exception to this will be the Housing Credit Gap Financing developments, which will follow the Threshold Review process established in the OHFA Qualified Allocation Plan.***

NOTE: The Threshold Review period is **NOT** to be considered additional time to provide required documentation. Threshold Review is an opportunity to correct errors in documents provided. Applicants are expected to provide a complete application on or before the designated deadline.

Award Process:

The Housing Credit Gap Financing developments will follow the allocation system established in the OHFA Qualified Allocation Plan. OHFA reserves the right to prioritize developments located in rural areas and developments not located in a HUD Participating Jurisdiction, regardless of the Pool in which the development was funded.

Applications submitted in the HDGF round will be evaluated based on the following criteria: 1) capacity and experience of the applicant and development team; 2) financial feasibility of the development; 3) site selection; 4) development design; 5) demonstrated market for the development and 6) Policies as stated in the Program Guidelines.

Tie Breaker:

In the event a Tie Breaker becomes necessary, OHFA will prioritize those projects which most effectively meet OHFA’s Policies.

Proforma or Affordability Analysis - A financial review will include an evaluation to determine the amount of funds necessary to complete the actual development of the development, considering all other committed sources.

The financial review for rental housing developments includes the analysis of a 15-year proforma, assuming a 2% annual revenue increase, a 3% annual operating expense increase, and a 7% stabilized vacancy rate. If the proforma forecasts different assumptions, justification must be provided. The affordability analysis for rental developments requires the resident's rent and utility payments not to exceed 30% of an income-qualified household's income at the projected affordability level. Utility allowance information must be obtained from the local public housing authority, local utility provider, or other approved source (e.g. actual history of usage on rehab developments).

Pre-Award Site Visit - The Housing Development Analyst (HDAS) may conduct a site visit prior to submitting a recommendation for funding. The purpose of the visit is 1) to allow the HDA to evaluate the proposed development site for suitability and impact on the surrounding community, 2) to allow the HDA to

confirm the status of previously funded developments, and 3) to develop the relationship between the applicant and OHFA. Both parties can discuss any issues or concerns regarding the proposed development and the organization is provided the opportunity to familiarize OHFA staff with their programs and operations overall.

Formal Recommendation for Funding - For developments funded through OHTF and HOME, the Housing Development Analyst (HDA) will present the development and submit a recommendation for funding, either for approval or rejection, to the HDS team, and the OHFA Board's Multifamily Committee. The Committee will submit a formal recommendation to the Ohio Housing Finance Agency's Board.

Upon approval by the OHFA Board, OHFA staff will notify the community's state legislators and issue a press release.

24) Application Submission:

Proposals must be submitted on a CD, with all required documents clearly labeled as detailed in the program guidelines.

Applications should be submitted to the Office of Planning, Preservation and Development, Ohio Housing Finance Agency (OHFA), 57 East Main Street, Columbus, Ohio 43215-5135.

The application submission date for Housing Credit Gap Financing will be the same as for the Housing Credit applications. The OHFA Board will determine the applications deadline for the HDGF funding round(s).

Incomplete Applications: Developments will undergo a preliminary review to determine whether or not a complete application has been submitted. If it is determined that OHFA cannot evaluate the proposal based on the information provided, the application will be returned to the applicant along with a written listing of all deficiencies of the application.

3. CHDO Competitive Operating Grant Program

Goals: To provide operating support to organizations to continue affordable housing development.

Total Funds Available: The budget for this competitive program will be set at $500,000 with a maximum grant award of $35,750 or an amount such that total operating budget does not exceed 50 percent of the organizations' total operating budget.

An additional $200,000 with a maximum grant award of $50,000 will be available for CHDOs interested in combining their organizations with other state-certified CHDOs.

Grant Terms: Grants will be written for a 12-month period commencing no sooner than on July 1, 2012.

Minimum Funding Requirement: All grant decisions will be based on the sponsor's effective control of an OHFA-funded project in the development phase or a proposed project using OHFA funds.

Some characteristics of an organization with "effective control" include:

- Is the lead contact in all or most of the development related correspondence between the development and OHFA,
- Is knowledgeable regarding project specific information,
- Can demonstrate input in the project design and construction process, and
- Shares a reasonable amount of the developer's fee as evidenced by the partnership agreement.

During the grant period, OHFA will monitor the CHDO in order to subjectively gauge the continued eligibility of the CHDO.

Eligible Applicants: The organization must be a state-designated CHDO and must meet the following criteria: is incorporated with the Ohio Secretary of State; is granted 501(c)(3) or 501(c)(4) organizational status from the IRS; has served the local community at least one year prior to the commitment of HOME-CHDO funds; has a purpose which includes a commitment to affordable housing as evidenced in its by-laws, charter or resolutions; has no public or for-profit entity control; has a board with at least one-third of its representation from area low-income residents or low-income neighborhood organization representatives; has a formal process of citizen participation for program beneficiaries to advise the organization in all aspects of the development; has a demonstrated capacity to carry out HOME-related and/or HOME-eligible activities; and meets all new HUD regulatory requirements for CHDO certification.

Ineligible Applicants: Organizations that are not a State-Certified CHDO at the time of application.

Eligible HOME-CHDO Operating Activities: Activities including, but not limited to, the following are eligible HOME-CHDO Operating Grant activities**:**

- Administrative and support staff costs, including fringe benefits, for staff directly involved in housing development activities.

- Non-staff administrative costs such as supplies, travel, equipment, space and maintenance, telephone, postage, printing and duplicating, staff and board training.

Ineligible HOME-CHDO Operating Activities:

- Operating costs incurred by a CHDO operating in the capacity of a sub-recipient or contractor under the HOME program for a specific development.

- Pre-development costs such as engineering, architecture, options, marketing, market studies, etc.

- All activities related to the administration of the Community Housing Improvement Program, Community Development Block Grant, Community Service Block Grant, or other local, State, or federal programs in which the CHDO acts in the capacity of a sub-recipient.

CHDO Operating Funding Committee: A committee led by OHFA will be organized comprising of a representative sample of Ohio's Participating Jurisdictions (PJs), ODOD, and the Ohio CDC Association. This committee will a) provide guidance for the 2012 application process and b) develop a strategy for long-term sustainability of CHDOs in Ohio with the goals to substantially reduce funding in urban areas and help maintain or subsidize operating costs for rural CHDOs that are efficiently producing affordable housing units.

4. Homeless Crisis Response Program

Goal: To prevent individuals and families from entering homelessness and, where homelessness does occur, to provide for emergency shelter operations and to rapidly move persons from emergency shelter into permanent housing.

The Homeless Crisis Response Program is divided into two components: emergency shelter operations and shelter diversion activities. The emergency shelter operations and services component functions similarly to the Homeless Assistance Grant Program (HAGP) from past years while the shelter diversion and re-housing activities component includes activities similar to the Homeless Prevention and Rapid Re-housing Program (HPRP). These programs have been redesigned to reflect changes in the federal Emergency Solutions Grant (ESG) program.

Additionally, in response to HUD's increased emphasis on systems-level performance and coordinated intake processes through the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, the state has been organized into regions. Over time, these Homeless Planning Regions will allow for streamlined coordination and communication regarding Continuum of Care administrative tasks such as the annual Point in Time Count and Housing Inventory Chart processes, as well as functioning as service areas for the shelter diversion and re-housing component of OCD funding.

Eligible Applicants: Funding is available to eligible non-profit organizations, units of local government, public housing authorities and consortia of any eligible applicants that meet the housing needs of homeless and low-income families and individuals.

Only one state-appointed entity per Homeless Planning Region is eligible to apply for diversion and re-housing activity funds on behalf of the region. To apply for shelter diversion and re-housing funds, each region is required to develop a collaborative, Regional Homeless Service Coordination Plan (regional plan). Regional plans should include agreed upon participant screening criteria, common assessment tools and referral processes. OCD will offer technical assistance in developing these plans upon request by the regions. More detailed guidance on development of regional plans is included in this Consolidated Plan on pages 114-116.
Note: All agencies applying for emergency shelter funding must participate in this planning process and be listed in the Regional Homeless Service Coordination Plan to be eligible for emergency shelter funds.

Total Funds Available: Includes Ohio Housing Trust Funds (amount to be determined); $5.1 million in Federal Emergency Solutions Grant

Maximum Award Amounts:

Category	Maximum Award	Grant Period
Emergency Shelter:	$350,000 per shelter	Two Years
Emergency Shelter (Youth Shelter):	$200,000 per shelter	Two Years
Shelter Diversion:	_____	Two Years

Note: Requests in excess of the "Maximum Award" listed above may be made if a waiver is submitted to and approved by OCD by August 10, 2012. The maximum award amounts may be lowered if the total funds available in FY 2012 for the Homeless Crisis Response Program are less than anticipated.

Funding Method:

Emergency Shelter Activities: Shelter programs currently funded by OCD are eligible to apply for funding based on their previous funding level. Changes to program design and capacity will be taken into consideration. The applicant's ability to meet determined program performance benchmarks will also be considered.

Emergency shelters not currently funded by OCD may apply competitively through the 2012 Homeless Crisis Response Program application process. However, OCD advises that with the availability of shelter diversion and re-housing funds through this program, OCD does not anticipate funding many, if any, new emergency shelters or shelter expansions.

Shelter Diversion and Re-housing Activities: Funding for diversion and re-housing activities will be available in two parts. First, all areas of the state will receive, through their state-appointed regional applicant, a formula allocation of funding. This formula allocation will assure the availability of at least minimum levels of crisis response funding for persons experiencing imminent or literal homelessness in all areas of the state. Additionally, remaining shelter diversion and re-housing funds could be available on a competitive basis through the regional shelter diversion plan and application.

Eligible Activities:

Emergency Shelter Operations and Services:

- General Administration funds limited to the costs of administering the portion of the Homeless Crisis Response Program grant for Emergency Shelter activities.

- Operating expenses funds to operate and staff an Emergency Shelter program.

- Essential Services costs to provide limited case management, goal planning, and permanent housing placement for an Emergency Shelter.

- Other Costs funds to provide for staff directly associated with shelter maintenance and security operations.

Shelter Diversion and Rehousing:

A. Financial Assistance including rental assistance; rental arrears; security and utility deposits; utility payments; moving cost assistance; and, in certain circumstances, motel and hotel vouchers.

B. Housing Relocation and Stabilization Services including case management; outreach and engagement; housing search and placement services; legal services; and credit repair.

C. Data Collection and Evaluation
Data collection and evaluation costs include appropriate costs associated with operating a Homeless Management Information System (HMIS) for purposes of collecting and reporting data required by HUD and OCD. Eligible costs include the:

- purchase of HMIS software and/or user licenses (non-balance of state areas);
- leasing or purchasing needed computer equipment for providers, costs associated with data collection;
- entry and analysis; and
- staffing associated with the operation of the HMIS, including training.

HMIS activities that are ineligible include:

- planning and development of an HMIS;
- development of new software systems;
- contracting for program evaluation; and
- replacing state and local government funding for an existing HMIS.

D. Administrative Costs
Homeless Crisis Response Program funds may be used for accounting of grant funds, preparing reports, obtaining program audits, similar costs related to administering the grant after the award and staff salaries associated with these administrative costs.

Administrative costs also include training for staff who will administer the program or case managers who will serve program participants, as long as this training is directly related to learning about HCRP.

Matching Requirements: Emergency shelter applicants must provide at least $1 in local public or private resources for every $2 in Homeless Crisis Response Program funds (a ratio of 1:2 Other funds to Homeless Program funds). Grants or loans from the Ohio Department of Development cannot be used as match. No match is required for shelter diversion activities.

Threshold Requirements:

- Proposals for emergency shelter activity funds must be included in the Regional Homeless Service Coordination Plan to be considered for funding.
- Applicants must be participating in the appropriate Homeless Management Information System (HMIS) and meet minimum data quality standards. If not a current OCD grantee, applicants must agree to participate if awarded funding.
- Proposals must include documentation verifying the commitment of sufficient matching funds to meet the match requirements.
- All programs must be targeted to individuals or families who are homeless or at risk of homelessness by federal definition. Shelter diversion and re-housing programs must be targeted at individuals and families below 30% of area median income.
- For Youth Shelters, the parent organization must be accredited by a recognized accreditation organization such as Council on Accreditation (COA), Commission on Accreditation of Rehabilitation Facilities (CARF), or The Joint Commission on Accreditation of Healthcare Organizations (JCAHO) or be licensed by the Ohio Department of Job and Family Services (ODJFS) to provide emergency shelter for youth.
- Only complete applications, including all essential exhibits, will be reviewed.

Rating Criteria: OCD will rate applications based on the following criteria:

1. Proposal Content (25 points): The proposal narrative must clearly identify the problem to be addressed, population group(s) to be served and the activities to be undertaken, described in detail. Applicants must include an outline of intended goals and outcomes, including the projected impact on local homeless needs. If the project is designed to serve targeted subpopulations, applicants should address how the needs of other populations are being met within the community.

2. Outcomes (30 points): Based on data entered into HMIS, applicants must demonstrate acceptable performance in the following indicators:
    - Reduction in average length of stay
    - Reduction in first-time homelessness
    - Reduction in recidivism
    - Self-sufficiency standards
        - Increased or maintained employment upon exit –or-
        - Increased or maintained income upon exit

    For new applicants applying competitively, determinations in this category will be based on the extent to which the program design is clearly defined, built on evidence-based practice and likely to achieve stated outcomes.

3. Collaboration (10 points): Applicants should demonstrate strategic partnerships that would strengthen the success of the program model. Examples of partnerships could include referring agencies, supportive service providers, local government offices or mainstream service providers. Applications including letters of support from these partners will rate higher than those only providing narratives.

4. Targeting and Need (10 points): For all programs, applicants must demonstrate the method used for determining current demand for services in their community.

- Emergency shelter operations and services applicants must describe their plan for diverting individuals and families from shelter stays where possible and appropriate.
- Shelter diversion and re-housing applicants must describe their targeting method for determining which families and individuals are most appropriately served with this program, including self-sufficiency criteria to determine which families and individuals are likely to experience homelessness, but for intervention.

5. Capacity (10 points): Projects will be evaluated based on the extent to which the applicant demonstrates the organization's ability to implement proposed activities. Items taken into consideration include the organization's history and descriptions of key staff involved in the project.

6. HMIS Data Quality (10 points): All applicants are required to meet minimum HMIS data quality standards to be considered for funding. To earn points in this criterion, applicants data quality must exceed minimum standards according to a point scale detailed in the funding application.

Program Period: Awards will be granted for 12 month and 24 month grant periods, as determined by OCD. Grantees must complete their program according to the following deadlines: (1) All activities must be completed by the end of the 12th or 24th month, as determined by the work completion date identified in the grant agreement; (2) All drawdown requests must be submitted to OCD within one month of the work completion deadline; (3) All funds must be disbursed and expended, and a final performance report must be submitted to OCD within two months of the work completion deadline.

Reduction of Grant Request: OCD reserves the right to award competitive grants at amounts lower than requested in the application.

Application Submission: The Homeless Crisis Response Program application submission deadline is 5 p.m. on September 5, 2012. Applications must be submitted to the Office of Community Development (OCD), 77 South High Street, 25th Floor, Columbus, Ohio 43215. Overnight delivery items will be considered filed in a timely manner if received in OCD on or before September 6, 2012 or upon submission of documentary evidence that they were placed in transit with the overnight delivery service by no later than 5 p.m. on Sept 5, 2012.

Grant Award: Approximately ten weeks after submission, immediately after State Controlling Board approval.

5. Supportive Housing Program

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

Total Funds Available: Includes SFY 2012 Ohio Housing Trust Funds (amount to be determined).

Maximum Award Amounts:

Category	Maximum Award	Grant Period
Supportive Housing:	$480,000	Two Years
Permanent Supportive Housing:	$300,000	Two Years

Note: Requests in excess of the "Maximum Award" listed above may be made if a waiver is submitted to and approved by OCD by August 10, 2012. The maximum award amounts may be lowered if the total funds available in FY 2012 for the Supportive Housing Program are less than anticipated.

Funding Method: Supportive housing and permanent supportive housing programs currently funded by OCD are eligible to apply for funding based on their previous funding level. Changes to program design and capacity will be taken into consideration. The applicant's ability to meet determined program performance benchmarks will also be considered.

Eligible Applicants: Funding is available to eligible non-profit organizations, units of local government, public housing authorities and consortia of any eligible applicants for supportive housing and permanent supportive housing that meet the housing needs of homeless and low-income families and individuals.

Eligible Activities:

Supportive Housing:
For purpose of this program, supportive housing activities are limited to project-based program models, either single site or scattered site. Tenant-based supportive housing activities are provided out of the shelter diversion activities in the Homeless Crisis Response Program.

- Rental payments to support the operation of supportive housing projects designed to place clients in permanent housing within 4-24 months.

- Supportive Services linked to supportive housing programs that are designed to help program participants attain permanent housing and housing stability in a 4 to 24-month period. NOTE: No more than 20% of Ohio Housing Trust Fund dollars may be spent on supportive services; therefore, please keep supportive services requests to an absolute minimum.

- Operating expenses to support the recurring costs of operating a supportive housing program. This includes both staff and non-staff costs associated with the operation of the program, such as front door staff.

- Administrative expenses such as accounting of grant funds, preparing reports, obtaining program audits, similar costs related to administering the grant after the award and staff salaries associated with these administrative costs. Administrative costs also include training for staff who will administer the program or case managers who will serve program participants, as long as this training is directly related to learning about the Supportive Housing Program. **NOTE**: Administrative expenses are now a standalone budget item and *should not* be rolled into other line items as in years past.

- Activities are limited to households with income at or below 35% Area Median Income (AMI).

Permanent Supportive Housing:

- Operating expenses linked to permanent supportive housing programs for homeless persons with disabilities targeted primarily to homeless individuals with mental illness, chemical dependency, AIDS/HIV or other permanent disabilities. Permanent Supportive Housing programs currently funded with Homeless Assistance Grant Program funds by OCD may apply for renewal of funded activities.

- Provisional housing assistance including first month's rent, security deposits and utility payments designed to place homeless households into Permanent Supportive Housing units in which the household is able to remain in the same housing at the completion of the services. This limited bridge funding will help eligible persons who are transitioning into permanent supportive housing obtain housing while awaiting a permanent housing subsidy. This assistance is time limited with the assurance that future housing/rental assistance is expected and shall not be used for persons currently in permanent supportive housing.

- Administrative expenses such as accounting of grant funds, preparing reports, obtaining program audits, similar costs related to administering the grant after the award and staff salaries associated with these administrative costs. Administrative costs also include training for staff who will administer the program or case managers who will serve program participants, as long as this training is directly related to learning about the Supportive Housing Program. **NOTE**: Administrative expenses are now a standalone budget item and *should not* be rolled into other line items as in years past.

- Activities are limited to households with income at or below 35% Area Median Income (AMI).

Matching Requirements: Applicants must provide at least $1 in local public or private resources for every $2 in Supportive Housing Program funds for supportive housing and permanent supportive housing (a ratio of 1:2 other funds to homeless program funds). Grants or loans from the Ohio Department of Development cannot be used as match.

Threshold Requirements:

- Proposals must include documentation that the program(s) is supported by the local Continuum of Care (CoC). Agencies in communities that do not have a formal CoC, must explain the efforts the agency is making to coordinate with other agencies in the community to establish a formal CoC. Applications that do not include written verification that the agency is an active participant in their local CoC or equivalent organization, as appropriate, or whose project is not supported by the local CoC may not be reviewed.

- Applicants must be participating in the appropriate Homeless Management Information System (HMIS) or, if not a current OCD grantee, agree to participate if awarded funding.

- Proposals must include documentation verifying the commitment of sufficient matching funds to meet the match requirements for supportive housing and permanent supportive housing programs.

- All program activities must be targeted at people who are homeless or at risk of homelessness, according to federal definition.

- Applications must be complete and included essential information and exhibits.

- Supportive housing and permanent supportive housing programs that provide housing in fixed units operated by the applicant agency must maintain a minimum occupancy rate of 90 percent.

Rating Criteria: OCD will rate applications based on the following criteria:

1. Proposal Content (30 points): The proposal narrative must clearly identify the problem to be addressed, population group(s) to be served and the activities to be undertaken, described in detail. Applicants must include an outline of intended goals and outcomes, including the projected impact on local homeless needs. If the project is designed to serve targeted subpopulations, applicants should address how the needs of other populations are being met within the community.

   In addition, applicants applying for supportive housing funds must explain why a project-based model is appropriate for their programs in contrast to a rapid rehousing or transition-in-place model.

   Programs with an average length of stay greater than 12 months will need to explain why a stay of this duration is necessary. OCD's preference is to place persons in permanent housing as quickly as possible; therefore, supportive housing programs need to demonstrate the benefit of the program design for the persons being targeted.

2. Outcomes (30 points): Based on data entered into HMIS, applicants must demonstrate acceptable performance in the following indicators:
   - Reduction in average length of stay
   - Reduction in recidivism
   - Self-sufficiency standards
     - Increase in employment upon exit –or-
     - Increase in income upon exit
   - Increase in positive housing exits

   For new applicants applying competitively, determinations in this category will be based on the extent to which the program design is clearly defined, built on evidence-based practice and likely to achieve stated outcomes.

3. Collaboration (10 points): Applicants should demonstrate strategic partnerships that would strengthen the success of the program model. Examples of partnerships could include referring agencies, supportive service providers, local government offices or mainstream service providers. Applications including letters of support from these partners will rate higher than those only providing narratives.

4. Resident Transition Planning (10 points): Applications must demonstrate elements of the proposed project design that encourages and assists program participants to graduate out of the program model where appropriate. For supportive housing, this means a move to permanent housing and, for permanent supportive housing programs, maintaining stabile permanent housing outside the program.

5. Capacity (10 points): Projects will be evaluated based on the extent to which the applicant demonstrates the organization's ability to implement proposed activities. Items taken into consideration include the organization's history and descriptions of key staff involved in the project

6. HMIS Data Quality (10 points): All applicants are required to meet minimum HMIS data quality standards to be considered for funding. To earn points in this criterion, applicants data quality must exceed minimum standards according to a point scale detailed in the funding application.

Program Period: Grantees must complete their program according to the following deadlines: (1) All activities must be completed by the end of the 24th month, as determined by the work completion date identified in the grant agreement; (2) All drawdown requests must be submitted to OCD within one month of the work completion deadline; (3) All funds must be disbursed and

expended, and a final performance report must be submitted to OCD within two months of the work completion deadline.

Reduction of Grant Request: OCD reserves the right to award competitive grants at amounts lower than requested in the application.

Application Submission: The Supportive Housing Program application submission deadline is 5 p.m. on July 11, 2012. Applications must be submitted to the Office of Community Development (OCD), 77 South High Street, 25th Floor, Columbus, Ohio 43215. Overnight delivery items will be considered filed in a timely manner if received in OCD on or before July 12, 2012 or upon submission of documentary evidence that they were placed in transit with the overnight delivery service by no later than 5 p.m. on July 11, 2012.

Grant Award: Approximately ten weeks after submission, immediately after State Controlling Board approval.

6. Housing Assistance Grant Program

Goal: To promote affordable housing opportunities and improve housing conditions for low-income families and individuals.

Total Funds Available: SFY 2013 Ohio Housing Trust Funds (amount to be determined)

Eligible Applicants: Private, non-profit organizations incorporated with Ohio's Secretary of State and granted 501.c.3 status by the Internal Revenue Service.

Maximum Award Amounts:

Maximum two-year awards for Emergency Home Repair/Handicapped Accessibility Modifications is $500,000; and $150,000 for Down Payment Assistance/Homebuyer Education. Maximum amounts may be changed based on Total Funds Available. Requests in excess of $500,000 for Emergency Home Repair/Handicapped Accessibility may be made if a waiver is submitted to and approved by OCD by the date stated in the application and for the reasons stated in the FY 2012 Housing Assistance Grant Program application instructions.

Recommended Request Amounts:

Funding requests must be cost effective and reasonable based on community need, historical level of funding from OCD, cost per household served, cost per outcome, etc. OCD will provide guidance on recommended request amounts in the FY 2012 Housing Assistance Grant Program application. OCD reserves the right to make awards at levels less than requested.

Eligible Activities:

- Emergency home repair/accessibility modifications that if not corrected could pose a threat to the health or safety of the occupants. Limit of assistance is $7,500 per unit. Income targeting to households at or below 50% Area Median Income (AMI).

- Down Payment Assistance – limit of assistance - $3,000 (limited to 3% of purchase price plus out of pocket expenses). Income targeting to households at or below 65% AMI with a preference to persons at or below 50% AMI.

- Homebuyer Education – pre- and post-purchase counseling must be tied to Down Payment Assistance activity. Income targeting to households at or below 65% AMI with a preference to households at or below 50% AMI.

Matching Requirements: Each $2 in Housing Assistance Grant Program funds must be matched with $1 in cash and/or in-kind resources. Grants or loans from the Ohio Department of Development cannot be used as match.

Threshold Requirements:

- Proposals must include documentation verifying the commitment of sufficient matching funds to meet the match requirements.

- Proposals must be for eligible activities consistent with Housing Assistance Grant Program definitions and guidelines.

- Applications must be complete and include essential information and exhibits.

Rating Criteria: OCD will rate applications based on the following criteria.

1) Program Impact (10 points): Projects will be evaluated based on the extent to which proposal has a direct relationship to eligible categories in the Housing Assistance Grant Program.

2) Need (15 points): Extent to which the project fills a gap in available housing activities that cannot be provided through other means and, for Emergency Home Repair/Accessibility Modifications projects, evidence that CDBG funds are not available.

3) Income targeting (10 points): Extent to which the project serves low-income persons with household income at or below 35% of AMI for Emergency Home Repair/Accessibility Modifications and/or 65% AMI (with a preference of 50% AMI) for Down Payment Assistance/Homebuyer Counseling.

4) Organization History (10 points): Extent to which the applicant demonstrates the ability to successfully implement the proposed activities.

5) Staff Background/Experience (10 points): Projects will be evaluated based on the degree to which resumes or position descriptions are provided for key staff involved in the project and demonstrate sufficient background and experience to successfully implement the project.

6) Program Feasibility (15 points): The extent to which the project is reasonable and cost effective based on the request amount, cost per housing unit, etc.

7) Program Coordination (10 points): Projects will be evaluated based on the extent to which documentation demonstrating coordination and support for the project or activity is provided by organizations involved in the project.

8) Project Design/Outcomes (15 points): The extent to which projects are well designed, clearly presented, and are likely to produce or retain housing stock and accomplish the stated objectives and proposed outcomes

9) Budget Accuracy/Reasonableness (5 points): Extent to which budget figures are accurate, consistent and reasonable.

Program Period: The program year will begin March 1, 2012 provided sufficient Ohio Housing Trust funds are available. Grantees must complete their program according to the following deadlines for two year grants: (1) All activities must be completed by the end of the 24th month, as determined by the work completion date identified in the grant agreement; (2) All drawdown requests must be submitted to OCD within one month of the work completion deadline; (3) All funds must be disbursed and expended, and a final performance report must be submitted to OCD within two months of the work completion deadline.

Reduction of Grant Request: OCD reserves the right to award competitive grants at amounts lower than requested in the application.

Application Submission: The Housing Assistance Grant Program application submission deadline is 5 p.m. on December 14, 2012. Applications must be submitted to the Office of Community Development (OCD), 77 South High Street, 25th Floor, Columbus, Ohio 43215. Overnight delivery items will be considered filed in a timely manner if received in OCD on or before December 14, 2012 or upon submission of documentary evidence that they were placed in transit with the overnight delivery service by no later than 5 p.m. on December 14, 2012.

Grant Award: Approximately ten weeks after submission and following Controlling Board Approval.

7. Housing Opportunities for Persons With AIDS (HOPWA) Program

Goal: Through the federal Housing Opportunities for Persons With AIDS (HOPWA) Program, OCD provides eligible non-profit organizations or units of local government with funds to devise long-term, comprehensive strategies for meeting the housing and supportive service needs of persons with AIDS or HIV-related diseases.

Total Funds: Approximately $1.2 million.

Eligible Applicants: Private, non-profit organizations incorporated with Ohio's Secretary of State and granted 501.c.3 status by the Internal Revenue Service; and units of local government.

Grant Ceiling: The maximum grant request is based on the percentage of cases of Persons Living with HIV/AIDS within the project's service area when compared to the balance of state (areas outside the Columbus, Cincinnati, Cleveland service areas). Figures promulgated by the Ohio Department of Health are used for this calculation. An adjustment factor of 1.05 and 1.10 is used for urban and rural counties, respectively. Applicants are encouraged to apply for an amount less than the maximum amount. OCD may consider requests for amounts larger than the maximum amount; however, written approval from OCD must be obtained.

Eligible Activities:

- short-term rental, mortgage, and/or utility assistance;
- acquisition, rehabilitation or construction of permanent housing;
- operation of a community residence;
- referral to drug and alcohol abuse treatment and counseling;
- limited case management;
- respite care;
- food/nutritional services;
- activities of daily living;
- day care;
- transportation;
- general administration; and
- housing information services.

Matching Requirements: The applicant must match the requested amount of HOPWA funds at a minimum ratio of 1:1.

Rating System Principles:

(1) Degree to which the proposal meets the needs of the target population;
(2) Evidence of local coordination of resources and need for gap funding resources;
(3) Evidence of local support -- specifically, how the proposal fits into the local community's continuum of care and is supported by the local Ryan White HIV/AIDS Service Consortia and the HIV/AIDS Coordinator for the Area;
(4) Program Design;
(5) Financial stability/management and stability of the applicant/administering agency; and
(6) Ability of applicant to administer the program/administrative capacity.

Rating Criteria: OCD will rate the applications based on the following selected criteria:

(1) Need (15 points): Projects will be evaluated based on the degree to which they meet the unmet needs of the community to be served by the program; need of the area's population for HOPWA eligible programming and services as described in the Consolidated Plan or the Community Housing Improvement Strategy; and extent to which the proposal is consistent with local needs and fits into a community-wide strategy addressing those needs.

(2) Program Design (20 points): Projects will be evaluated based on the type and quality of proposed activities: emphasis on housing and housing-related activities, especially operation of a community residence providing long-term housing; outreach and referral systems; criteria for selecting residents for housing and services; method for verifying client eligibility and ensuring that client needs cannot be met through other programs; case management plan and how that plan will help meet the client's needs; measures ensuring that clients receive the appropriate type, delivery and level of service; and rational for discontinuing or limiting services.

(3) Coordination (20 points): Projects will be evaluated on the degree to which they coordinate with other mainstream organizations in the community to meet the housing and service needs of persons with AIDS; extent of coordination with units of local governments, local health departments or other organizations serving persons with AIDS or related diseases; extent of coordination with local Ryan White Consortium and/or AIDS task force, support from the Ryan White HIV/AIDS Service Consortia and the HIV/AIDS Coordinator for the Area; and how the organization fits in the local community's continuum of care in addressing the needs of the targeted population.

(4) Financial Management (25 points): Projects will be evaluated based on their financial management practices: internal control procedures; reasonableness of proposed budget; and amount and diversity of other funds committed.

(5) Administrative Capacity (20 points): Projects will be evaluated on the capability of the organization's staff to implement the proposed project: organization's history, including its experience in implementing the proposed activities; key staff's relevant educational background, professional certifications, licenses and work experience; and performance on current grant (if applicable).

Program Period: Grantees must complete their program according to the following deadlines: (1) All activities must be completed by the end of the 12th month; (2) All drawdown requests must be submitted to OCD by the end of the 13th month; (3) All funds must be disbursed and expended, and a final performance report must be submitted by the end of the 14th month.

Reduction of Grant Request: OCD reserves the right to award competitive grants at amounts lower than requested in the application.

Application Submission: The HOPWA application submission deadline is 5 p.m. on November 1, 2012. Applications must be submitted to the Office of Community Development (OCD), 77 South High Street, 25th Floor, Columbus, Ohio 43215. Overnight delivery items will be considered filed in a timely manner if received in OCD on or before November 1, 2012 or upon submission of documentary evidence that they were placed in transit with the overnight delivery service by no later than 5 p.m. on November 1, 2012.

Grant Award: Approximately seven (7) weeks after submission.

Community and Economic Development

Community Development Program:

- ***Formula Allocation Grants***
- ***Neighborhood Revitalization Grants***

Economic Development Loan and Public Infrastructure Grant Program

- ***Economic Development Loan Program***
- ***Economic Development Public Infrastructure Grant Program***
- ***Residential Public Infrastructure Grant Program***

Comprehensive Downtown Revitalization Grant Program

Community Development Corporations Microenterprise Business Development Program

1. Community Development Program

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

The program will include a set-aside of competitive neighborhood revitalization funds for projects designed to improve the quality of life, livability and functionality of distressed areas and neighborhoods to carry out a comprehensive strategy of revitalization. This includes, but is not limited to, projects designed to stabilize and enhance residential neighborhoods or activities that support redevelopment of Brownfield sites (adjacent to low-moderate residential neighborhoods) or commercial (non-central business district) or industrial sites (excluding direct loans to businesses).

A. Formula Allocation Grants

Total Funds: $17.5 million in CDBG funds (includes an amount yet to be determined for Neighborhood Revitalization)

Formula Allocation Principles: Funding allocations for communities are determined by dividing the number of low- and moderate-income (LMI) persons residing in the community by the total number of LMI persons residing in the non-entitlement areas of the state multiplied by the amount of CDBG Program funds allocated to the Formula Allocation Program for the year. The source of the number of LMI persons is U.S. Department of Housing and Urban Development (HUD), which used the 2000 Census data as the basis for estimating LMI figures. The funding allocation calculation will be completed for all non-entitlement cities and counties. Cities with a LMI population of 25 percent or greater and a funding allocation of at least $30,000, but less than $50,000, are defined as “acquired cities.” “Direct cities” are cities with a LMI population of 25 percent or greater and a funding allocation of $50,000 or more.

A county is required to expend the acquired city allocation on CDBG-eligible activities within the acquired city, minus allowable administration and implementation costs. A county is allowed a maximum of fifteen percent (15%) of a city’s allocation, whose grant it administers, for general administration and implementation. Acquired cities have the prerogative to select their own projects, as long as these projects are eligible, meet a national objective of the CDBG program, and do not exceed the available funds. Direct cities will be awarded and will administer their own grants.

The funding allocations for cities that do not meet the acquired or direct city criteria will be awarded to the county of jurisdiction. All communities within the county may petition the county for project funding consideration.

The “direct city” and “acquired city” designations that were established in FY 2010 and will apply for three program years (2010, 2011, and 2012), regardless of any change in funding allocations. The status of “direct” and “acquired” cities will be reassessed in program year 2012 for the 2013 program year.

Waiver or Surrender of Funds: An acquired city may waive its right to submit projects to be included in the county’s Formula application to the State for a given program year. In this case, the county has no further obligation to fund any projects in that city for that program year. This procedure must involve formal action by both the Board of County Commissioners and the City Legislative Authority. Copies of the legislative action taken by both the county and the city must be sent to OCD. An acquired city that chooses to surrender all or part of its allocation to the county must do so at least 30 days before the Formula Allocation Program application submission date, or it forfeits any portion of its funding allocation not committed to eligible activities.

In addition the county must agree to accept the funds and submit an eligible activity, including holding a public hearing. Acquired cities need to communicate their intentions to the county to allow sufficient time for these steps to occur. The acquired city is free to make arrangements with the county to surrender all or part of its allocation to the county for a particular year in exchange for funding being made available to the acquired city in some future year. OCD must receive documentation of any of the above actions (included as an exhibit in the Formula Allocation Program application) before they can be effective.

A county or city may choose to surrender all or part of its funding allocation to the State. Appropriate legislative action must be taken in this regard by the local government, and a copy of this action must be submitted to OCD on or before the Formula Allocation Program application deadline. In the event some or all funds are not committed to eligible activities in the Formula Allocation Program application by the submission date, those funds will be forfeited.

A city or county may opt to use its Formula Allocation Program funds as local match for CDBG competitive programs. This can be accomplished through the respective competitive application process. The project or activity must be identified as an activity in the Formula application, even if the competitive program funds have not yet been awarded. Should competitive funding not be secured, the community will need to seek an amendment to the grant agreement and reprogram these funds for another activity.

Eligible Jurisdictions: Under the FY 2012 Ohio Small Cities CDBG Program, 79 non-entitlement counties and 51 small cities (identified as cities by the Secretary of State as of January 1, 2012) will be guaranteed a funding allocation based entirely on the number of low- and moderate-income persons residing in the eligible community.

The following categories of communities will not receive funding under the Formula Allocation Program:

1) HUD Entitlement Cities (35);

2) HUD Urban Counties (9); and

3) Units of general local government with more than fifty percent (50%) of their population lying within an urban county.

Adjacent cities and/or counties may pool Formula Allocation funds for a common project(s), and may designate one unit of government or a recognized regional organization to administer the program on behalf of the participating units of government. A legal agreement must be executed by all parties involved, and prior approval must be secured from OCD.

Eligible Activities: Eligible activities are those contained in Title I of the Housing and Community Development Act of 1974, as amended. To meet its community development needs, a Formula Allocation grantee can select among those eligible activities. Formula grantees are not allowed to use their Formula allocation funds to capitalize or re-capitalize local Revolving Loan Funds. Formula grantees are not allowed to use their Formula Allocation funds to acquire property for land banking for future development of new housing construction.

Application Timing:

Application Submission:	June 22, 2012
Grant Award:	September 1, 2012

Holdover Option: Prior to the FY 2012 application submission deadline, and upon written request from the grantee's CEO, OCD will holdover for a period of one year only a grantee's entire Formula allocation for FY 2012 . However, funds for both FY 2012 and FY 2013 must be spent during the FY 2013 period, and projects must meet all FY 2013 program guidelines. Grantees will be expected to have projects planned for FY 2013, and cannot be guaranteed

funding in FY 2013. The public hearing requirements for FY 2012 still apply and must be fulfilled prior to the holdover request. Communities electing to holdover their entire FY 2012 Formula allocation may not submit an application for FY 2012 Neighborhood Revitalization Grant funds.

Revolving Loan Fund Participation: Local units of government will be required to substantially disburse any existing Revolving Loan Fund balance in conjunction with or prior to the submission of a funding application to the State for a specific community development project.

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

For applicants to the FY 2012 Formula Allocation Program, OCD will consider the already submitted CAS as the long-term plan for the community. A CAS is only required if a new project will be funded in a new investment area.

Administrative Costs: A maximum of fifteen percent (15%) of the total grant will be allowed for general administration and implementation costs. General administration costs include citizen participation, application preparation, grant agreement, environmental review, drawdown of funds and overall recordkeeping, reporting, audit(s) and closeout, program compliance and performance.

Engineering, architectural and legal service costs, which are related to activities undertaken with CDBG funds, can be charged to the specific activity line item budget.

Housing Activities: All program delivery and other soft costs related to work on a specific unit meeting a national objective must be paid for in one of two ways: (a) these costs may be charged to the activity budget (unit), or (b) These costs may be charged to administration. All program delivery or soft costs associated with projects that do not meet a national objective must be charged to administration. Eligible soft costs for the CDBG Program are defined at 24 CFR Part 570.202(b)(9).

All housing rehabilitation activities must be implemented in accordance with Ohio's Housing Rehabilitation Handbook. Grantees must develop and adopt a local Policies and Procedures Manual. All rehabilitation must meet or exceed local code or OCD Residential Rehabilitation Standards (OCD/RRS). Any emergency rehabilitation activities must meet the OCD definition. Emergency rehabilitation is not to be utilized in lieu of establishing a local walk-away policy or as a means to do rehabilitation that does not meet OCD/RRS on units that are in non-emergency situations.

Fair Housing: A Fair Housing activity can be treated as part of the general administrative budget, but Fair Housing, planning (except planning as an activity as discussed below) and administrative costs cannot exceed 20% of the total grant amount. Fair Housing can also be funded as a public service activity, although the community will have to track beneficiaries to assure that at least 51% of the beneficiaries are low or moderate-income. Public service activities cannot exceed 15% of the total grant amount; however, the State may waive this restriction, if deemed necessary.

In any case, any Fair Housing activity must include a specific program design with quantifiable, measurable services, and identified beneficiaries. Fair Housing does not count as a project. The state's Fair Housing requirements are described on pages 148-149 in the section entitled Local Government Certifications to the State.

Commitment of Formula Allocation Funds: Grantees committing Fiscal Year 2012 Formula Allocation grant funds to FY 2012 Water and Sanitary Sewer grant projects must reprogram the Formula Allocation funds to other CDBG eligible activities if the Water and Sanitary Sewer grant application is not approved by December 31, 2012.

Number of Projects: There is a limit to the number of projects a Formula grantee may undertake with CDBG funds. Counties may undertake a maximum of four projects, and cities may undertake a maximum of two projects. Counties will be allowed one additional project for each city Formula grant they administer, provided that the additional projects will be located within the city or cities whose Formula allocation they administer. Communities may request a waiver to exceed the maximum allowable number of projects. OCD will consider the factors presented in the community's request, and approval is at OCD's sole discretion.

The maximum number of projects for the counties includes projects undertaken on a countywide basis in one or more subunits of government. A project is further defined as being activity and location specific. Administration and Fair Housing will not count toward the allowable number of projects. Housing rehabilitation, demolition and the elimination of slum and blight will each count as one project regardless of how many units or activity location. An activity or activities undertaken in one Census area will count as one project. This may include for example targeted street, water, sewer, and housing improvements. Activities undertaken in a well-defined area or neighborhood, which may span over one or more Census areas will count as one project as long as the physical improvement is of a contiguous nature. The same type of activity (e.g., street improvements) undertaken in various subunits of government will count for as many projects as the number of communities in which the activity will be located, regardless of the number of contracts to be let by the grantee.

Grantees must justify how each activity meets a national objective.

Local Program Benefit: Regardless of which national objective a local grantee intends to meet, the program's overall benefit to persons from low- and moderate-income households shall be at least 51 percent (51%), exclusive of general administration. The 51% overall benefit requirement applies to all jurisdictions which receive a Formula allocation, regardless of the administering entity. The State may waive this requirement if it is deemed that a particular project warrants a departure from the overall program benefit guidelines.

In determining whether an activity will actually benefit low- and moderate-income persons, the net effect of the completed activity shall be considered. Thus, mere location of an activity in a low- or moderate-income area, while generally a primary consideration, does not conclusively demonstrate that the activity benefits low- and moderate-income persons. An activity (other than residential rehabilitation) which serves an area delineated and justified by the grantee, where a majority of the residents are low- and moderate-income persons, will meet the LMI standard.

Program Benefit Surveys: The grantee may qualify an activity on the basis of an income survey of the benefit area (or service area) of such activity (completed according to the OCD Survey Methodology) which shows that at least 51% of the activity beneficiaries will be of low- or moderate-income. The OCD Survey Methodology is posted on OCD's website at http://development.ohio.gov/cms/uploadedfiles/CDD/OHCP/OHCP08-03.pdf. The grantee is required to submit appropriate survey information to the State. Use of any additional database only will be allowed with prior OCD approval.

Urgent Need: Urgent Need is not an eligible national objective for the Formula Allocation Program. OCD has funds set aside for this purpose through its Discretionary Grant Program.

Integrated Effort: Formula Allocation Program grantees are encouraged to integrate any portion of their Formula Allocation Program funds into any FY 2012 CDBG competitive programs for which they wish to apply and successfully compete.

Program Amendments: Amendments must be reviewed and approved by OCD prior to implementation of the proposed change.

Situations Requiring an Amendment:

1. An amendment to an executed grant agreement is required if there is a **change** in an approved project or activity scope, location or design, number and type of beneficiaries, anticipated accomplishment, or national objective. In addition, a public hearing is required for changes, and must be preceded by a 10-day notice.

2. An amendment to an executed grant agreement is required if the grantee is proposing a **new activity**. The new activity must be consistent with the needs and strategies described in grantee's Community Assessment and Strategy (CAS). The grantee must provide a detailed work plan describing how the new activity will be completed by the work completion deadline of December 31, 2013. **A program amendment for a new activity may only be made up to July 31, 2013**. A public hearing is required for a new activity and a 10-day public notice must precede the hearing.

   However, on a case-by-case basis OCD will consider an amendment for a new activity beyond July 31, 2013 if a grantee can complete the activity by the work completion deadline of December 31, 2013.

3. An amendment to an executed grant agreement is required if the amount most recently approved by OCD for any previously approved activity is being increased or decreased by more than $5,000 or 10%, whichever is greater. These thresholds must be applied to both the activity from which the funds are to be removed and the activity to which the funds will be added. Increases or decreases less than this threshold will be reconciled during the closeout process. The administration cap may not be exceeded. For competitive programs, 90% of outcomes must be met for an activity prior to requesting an amendment to reduce funds in the activity. Additional restrictions or exceptions may be included in the guidelines for each program.

4. Activity outcomes may also be reduced by up to 10%, without an amendment, as a result of moving funds from one activity to another in order to meet an increased demand in another activity. However, outcomes may not be reduced without an amendment for other reasons.

Procedures for processing an amendment are as follows:

1. The Community submits a written request to OCD outlining the need to amend the approved grant.

2. If OCD determines that the amendment is warranted, an amendment form reflecting the proposed changes will be forwarded to the community. If the amendment request is not acceptable, a rejection letter will be sent.

3. The Community's CEO must sign the amendment form and return to OCD.

4. OCD will return the approved executed amendment to the community.

Amendments may be made only through the 15th month of the program period, except for new activities, in which case the final date is July 31, 2013.

Only two amendments may be made during the grant program period.

Program Extension: An extension must be reviewed and approved by OCD prior to implementation of the extension.

Situations Requiring an Extension:

1. An extension to an executed grant agreement is required if **all** work cannot be completed by the Work Completion Deadline of the 16th month of the grant period, December 31.

2. A program extension must be requested in writing by the local Chief Executive Officer (CEO) by October 31, two months before the work completion deadline of December 31. The request must contain a detailed explanation of why the extension is necessary.

3. Approval of an extension will be considered on a case-by-case basis**. Only one** extension will be granted and for no longer than six months past the Work Completion Date of December 31.

4. In rare cases, an extension beyond the original six-month extension period will be considered if the CDBG Formula Allocation Program funds are part of another grant such as a CDBG Water and Sanitary Sewer Program grant or if the delay is due to the complexity and magnitude of the CDBG-funded activity.

Procedures for processing an extension are as follows:

1. The community submits a written request to OCD outlining the need to extend the grant period.

2. If the extension request is approved, OCD will send the community three copies of the extension form containing the revised dates of the grant period. If the extension request is not acceptable, a rejection letter will be sent.

3. The community's CEO must sign all three copies of the extension forms and return them to OCD.

4. OCD will return the approved executed extension to the community.

Local Program Period: The Grant Agreement must be executed and returned to OCD within 10 working days of the date in the cover letter. Failure to do so will result in forfeiture of the grantee's allocation. Formula Allocation Program grantees will be allowed up to 18 months to have their FY 2012 programs ready for closeout, beginning with the general date set for all Formula Allocation Program grant agreements. Within this allowable program period, the following deadlines must be met:

1. All work must be completed by the end of the 16th month.

2. All funds must be drawn down by the end of the 17th month. This means that all "Requests for Payment and Status of Funds Report" (Form DS5) must be submitted to OCD before the end of the last business day of the 17th month. OCD will not honor any drawdown requests past this date, unless an extension request has been submitted to and approved by OCD.

3. All funds must be disbursed, expended, and final performance report submitted by the end of the 18th month.

4. Audit(s) of this grant must be conducted in accordance with OMB Circular A-133, described in the OCD Financial Management Rules and Regulations Handbook.

NOTE: FY 2012 Community Development Program award recipients receiving Neighborhood Revitalization funds will be allowed up to 26 months to have their FY 2012 program ready for closeout (see "Local Program Period" on page 63).

Application Submission: The application must be received by the Office of Community Development by 5 p.m. on June 22, the deadline for application submission. OCD may refuse any applications that either arrive after the deadline or are incomplete, particularly if the grantee has failed to attend OCD training sessions. **Communities that fail to meet the 5 p.m. deadline will forfeit their FY 2012 funding allocation**.

Application Revisions: During the application review process, OCD may require a community to revise its application before it can be approved. If this is necessary, communities will be allowed a maximum of 30 days to conduct appropriate revisions and re-submit their application to OCD. The final decision concerning revisions rests with OCD.

Redistribution of Population: Cities or villages that have portions of their population residing in more than one county shall be considered to be within the county containing the larger portion of their population for the purpose of Formula program allocation.

1. For Acquired Cities or Villages split by one or more Formula County boundaries, allocations to the counties will reflect the above mentioned population redistribution. Acquired Cities and Villages may only apply for funding to the county that contains the larger portion of their population.

2. Direct Cities split between an Urban (CDBG Entitlement) County and one or more Formula Counties will be eligible for Formula allocation funding only if the following criteria are met:

    a) The majority of their population resides within the CDBG non-entitlement county;

    b) Prior to April 30 of any program year, the city must submit in writing to the Office of Community Development (OCD) its intention to participate in the subsequent year's Ohio Small Cities CDBG Program; and

    c) Prior to April 30 of any program year, the city must submit to OCD written certification from the urban county that the city will not be a participant in the urban county's entitlement program during the upcoming year.

3. Acquired Cities or Villages split between an Urban County and one or more Formula Counties will be eligible to participate in the county Formula Allocation only if the following requirements are met:

    a) The majority of the population of the city or village resides within the CDBG non-entitlement county;

    b) Prior to June 1 of any program year, the city or village must submit to the Formula county and to OCD written certification from the urban county that the city or village will not be a participant in the urban county's entitlement program during the upcoming year; and,

    c) Prior to June 1 of any program year, the city or village must submit a written statement to the Formula county and to OCD, indicating that the city or village intends to be eligible for funding though the county's Formula allocation program.

Planning Activities: Formula grantees may choose to undertake CDBG-related planning activities. The planning activity will count as one project. Planning activities shall not exceed ten percent (10%) of the total grant amount up to a maximum of $10,000. These caps may be exceeded only by submitting a request to and receiving approval by OCD. In order to qualify for funding, planning activities must meet the following requirements:

1. The planning being undertaken must be for an eligible CDBG activity;

2. The planning activity must specifically identify the community's low- and moderate-income needs;

3. The planning activity must produce a tangible product (e.g., report or historical inventory) which will be reviewed by OCD;

4. The planning activity can be undertaken only for activities which, upon implementation, meet at least one of the three national objectives;

5. The planning activity must further the State of Ohio's investment objectives; and

6. The planning activity's product should be used to further the development and design of future applications to meet local community and economic development needs.

FY 2012 Formula Allocation Program Counties and Cities

Direct County Formula Allocation Program Grantees with Acquired Cities

Adams County
Allen County
Delphos
Ashland County
Ashtabula County
Geneva
Athens County
Nelsonville
Auglaize County
St. Marys
Wapakoneta
Belmont County
Martins Ferry
Brown County
Carroll County
Champaign County
Clark County
New Carlisle
Clermont County
Milford
Clinton County
Columbiana County
Coshocton County
Crawford County
Crestline
Darke County
Defiance County
Delaware County
Erie County
Vermilion
Fairfield County
Fayette County
Fulton County
Wauseon
Gallia County
Geauga County
Greene County
Guernsey County
Hancock County
Hardin County
Kenton
Harrison County
Henry County
Napoleon
Highland County
Greenfield
Hillsboro
Hocking County
Logan
Holmes County
Huron County
Willard
Jackson County
Jackson
Wellston
Jefferson County
Toronto
Knox County
Lawrence County
Licking County
Heath
Pataskala
Logan County
Lorain County
Amherst
Oberlin
Sheffield Lake
Lucas County
Maumee
Madison County
London
Mahoning County
Campbell
Marion County
Medina County
Meigs County
Mercer County
Celina
Miami County
Tipp City
Monroe County
Morgan County
Morrow County
Muskingum County
Noble County
Ottawa County
Port Clinton
Paulding County
Perry County
New Lexington
Pickaway County
Pike County
Portage County
Streetsboro
Preble County
Eaton
Putnam County
Richland County
Shelby
Ross County
Sandusky County
Bellevue
Scioto County
Seneca County
Shelby County
Trumbull County
Hubbard
Tuscarawas County
Dover
Uhrichsville
Union County
Van Wert County
Van Wert
Vinton County
Washington County
Belpre
Wayne County
Orrville
Rittman
Williams County
Bryan
Wood County
Wyandot County
Upper Sandusky

Direct City Formula Allocation Program Grantees

Ashland
Ashtabula
Athens
Bellefontaine
Brunswick
Bucyrus
Campbell
Cambridge
Celina
Chillicothe
Circleville
Conneaut
Coshocton
Defiance
Delaware
Dover
East Liverpool
Findlay
Fostoria
Fremont
Galion
Girard
Greenville
Ironton
London
Marion
Marysville
Maumee
Medina
Mount Vernon
New Philadelphia
Niles
North Ridgeville
Norwalk
Oregon
Piqua
Portsmouth
Ravenna
Salem
Sidney
Struthers
Tiffin
Troy
Urbana
Van Wert
Wadsworth
Washington C.H.
Wilmington
Wooster
Xenia
Zanesville

HUD CDBG ENTITLEMENT CITIES AND URBAN COUNTIES

HUD ENTITLEMENT CITIES

Akron
Alliance
Barberton
Bowling Green
Canton
Cincinnati
Cleveland
Cleveland Heights
Columbus
Cuyahoga Falls
Dayton
East Cleveland
Elyria
Euclid
Fairborn
Hamilton
Kent
Kettering
Lakewood
Lancaster
Lima
Lorain
Mansfield
Marietta
Massillon
Mentor
Middletown
Newark
Parma
Sandusky
Springfield
Steubenville
Toledo
Warren
Youngstown

HUD ELIGIBLE URBAN COUNTIES

Butler
Cuyahoga
Franklin
Hamilton
Lake
Montgomery
Stark
Summit
Warren

B. Neighborhood Revitalization Grants

Total Funds: The total amount of CDBG funds is yet to be determined

Grant Ceiling: $300,000 (for each Investment Area addressed)

Eligible Applicants: Formula Allocation Counties and Direct Cities. Communities electing to holdover their entire FY 2012 Formula allocation may not submit an application for FY 2012 Neighborhood Revitalization Grant funds.

Eligible Activities: Eligible activities include public facilities improvements such as construction, reconstruction, rehabilitation of infrastructure in targeted areas of distress that do not fit within the criteria of other Ohio Small Cities CDBG competitive programs.

Ineligible Activities:

- Downtown revitalization activities (i.e., the program cannot be used for improvements to an area that would be considered part of the Central Business District).
- Public service or direct benefit activities;
- Housing activities (i.e., the program cannot be used for direct housing assistance such as, but not limited to, private rehabilitation, home repair and downpayment assistance;
- Economic development activities (i.e., activities that would involve a loan to a private business or would require creating or retaining LMI jobs to meet CDBG eligibility requirements. Such activities are more appropriately funded through the CDBG Economic Development Program);
- Large scale, single-purpose water and sewer projects that extend beyond the investment area targeted for the application that are better suited for the CDBG Water and Sanitary Sewer Program; and
- Planning Activities

Number of Investment Areas: Neighborhood Revitalization applicants can only address one CAS Investment Area per application submission, except counties may address up to two CAS Investment Areas if at least one is located in an Acquired City. A CAS Investment Area may not be subdivided to create a target area for Neighborhood Revitalization Program funding. Likewise, two or more CAS Investment Areas may not be joined together to create a target area for Neighborhood Revitalization Program funding.

Local Program Benefit: The program is targeted to distressed communities or areas in Ohio which have a low- and moderate-income (LMI) population of at least 60%. An areawide activity may use Census data or income surveys to document 60% LMI population. Applicants may submit projects under the area-wide or spot slum and blight categories, in accordance with the OCD Community Development Program policies and requirements. However, the improvements must still be shown to have at least 60% LMI benefit, and the application will be rated on the same distress factors (LMI beneficiaries).

Administrative Cost: A maximum of 15% up to $35,000 of the total Neighborhood Revitalization award may be used for general administration, environmental review, audit and closeout.

Program Benefit Survey: The grantee may qualify a project on the basis of the most recent available Census Data or an income survey of the benefit area (or service area) of an activity according to the OCD Survey Methodology which shows at least 60% of the activity

beneficiaries will be of low and moderate income. The OCD Survey Methodology is posted on OCD's website at http://development.ohio.gov/cms/uploadedfiles/CDD/OHCP/OHCP08-03.pdf. Survey results must be submitted with the grant application. The original surveys must be available upon request.

Revolving Loan Fund Participation: Local units of government will be required to substantially disburse any existing Revolving Loan Fund balance in conjunction with or prior to the submission of a funding application to the State for a specific community development project.

Program Amendments/Extensions: Because of the competitive nature of the Neighborhood Revitalization awards, which are based on the rating criteria, recipients of Neighborhood Revitalization funds are discouraged from changing their programs through either an amendment or extension. OCD will consider on a case-by-case basis only those minor changes that do not affect the competitiveness of their approved activities for which the original funds were awarded. If the grantee is considering a change in program scope, location or design, number and type of beneficiaries or anticipated accomplishments, it must notify OCD of the proposed changes in writing. Formal written OCD approval is required. Amendments and extensions will be considered in application scoring during future funding rounds.

Local Program Period: Community Development Program award recipients receiving Neighborhood Revitalization funds must complete their programs according to the following deadlines: (1) all activities (except audit and balance of administration) must be completed by the end of the 24th month; (2) all drawdown requests must be submitted to OCD by the end of the 25th month; and (3) all funds must be disbursed and expended, and a final performance report must be submitted by the end of the 26th month. Audits of this grant must be conducted in accordance with OMB Circular A-133, as described in the OCD Financial Management Rules and Regulations Handbook.

Application Timing:

Submission:	June 22, 2012
Grant Award:	September 1, 2012

Community Assessment and Strategy: The targeted geographic area to be assisted must be consistent with the needs and strategies that are identified in the applicant's CAS, and this factor will be a consideration in the application review process in the Program Impact category. Due to the competitive nature of this segment of the Community Development Program, communities will not be allowed to submit revisions to the application that are tied to an Investment Area that is seeking funds for Neighborhood Revitalization activities.

60% Expenditure Threshold: Applicants must have expended 60% of any previously awarded Neighborhood Revitalization Program grant funds, exclusive of administration, or the FY 2012 neighborhood revitalization activities will not be considered for funding. OCD will calculate the ratio of expended funds based on drawdown records, at the time of the application submission. Grantees who received FY 2011 Neighborhood Revitalization Grant funds are not eligible for FY 2012 Neighborhood Revitalization Grant funds.

Rating System Principles:

All applications will be rated according to the following criteria:

The Neighborhood Revitalization Program portion of the Formula Allocation Program application should be comprehensive in scope and include a variety of program activities within the investment area. Applications that include only one or two activities will not rate well.

1) Distress (20 points): Distress points will be calculated based on the percent and number of LMI persons that will benefit from the proposed improvements.

2) Leverage (20 Points): The extent to which the community will leverage other resources; leverage will be based upon the amount of other resources as compared to the total grant request. Also, it will be based on the extent to which the community will coordinate efforts and the implementation of other programs with the proposed activities. Bonus leverage points will be awarded to applicants receiving a Formula Allocation grant allocation of less than $150,000 and using all or part of the fund as matching dollars for community distress activities. However, no more than 20 points may be awarded for leverage.

3) Program Impact (45 points): Program impact will be based on the extent to which the activities are based on a comprehensive approach to address needs within the targeted area; the extent to which the activities are consistent with the needs and strategies described in the applicant's most recent CAS; the extent to which implementation of the program will result in an improved living environment and quality of life for persons residing in the area. Program impact will also take into consideration administrative capacity of the applicant and/or consultant. Administrative capacity will include experience in administering the following aspects of OCD-administered programs; compliance with the grant agreement(s); program regulations and policies; resolution of monitoring and/or audit findings; and progress in the completion of activities. Program impact will also take into consideration the progress of activities currently funded with Neighborhood Revitalization dollars.

4) Citizen Participation (15 points): The extent to which the local citizens support the selection of the proposed activities; the effectiveness of the community's citizen participation process in involving local citizens in the program planning process. The planning process should include details regarding informational, project selection and priority selection strategies.

2. Economic Development Loan and Public Infrastructure Grant Program

Total Funds: $10,800,000

Program Categories: Eligible applicants may submit applications for one or more of the following categories of funding: Residential Public Infrastructure Program, Economic Development Public Infrastructure Program, and/or Economic Development Loan Program.

Local Program Benefit/National Objective: Communities **must** qualify activities under the HUD Ohio Small Cities CDBG program national objective of low- and moderate-income benefit.

Application Submission: Applications for funding will be available on OCD's website prior to the June 13, 2012 start of the program year. Applications will be accepted on an open cycle basis until funds are no longer available for the FY 2012 program year.

A. Economic Development Loan Program

Goal: The principal goal of the Economic Development Loan Program is to create and retain permanent, private-sector job opportunities, principally for low- and moderate-income persons, through the expansion and retention of business and industry in Ohio communities.

Grant Ceiling. $500,000 maximum for direct loans, Maximum grant ceiling includes project and program administration costs.

Eligible Jurisdictions: Non-entitlement cities and counties. Counties must apply on behalf of villages and townships; counties may also apply on behalf of cities within their jurisdiction.

Revolving Loan Fund Participation: Local units of government will be required to substantially disburse any existing Revolving Loan Fund balance in conjunction with or prior to the submission of a funding application to the State for a specific economic development project.

Eligible Activities: Eligible activities include provision of financial assistance, through eligible units of general local government, to private for-profit entities to carry out economic development projects directly and primarily related to the creation, expansion or retention of a particular business. Financing under the State CDBG Economic Development Program may cover fixed assets, including land, building, machinery and equipment, and site preparation directly related to business or industrial development. The amount and type of financial assistance provided to a project must be deemed appropriate with respect to the financial gap and the public benefit to be derived. Financing for fixed assets must be provided in the form of a non-forgivable loan.

Ineligible Activities:

- Financing of existing debt, working capital, non-capital equipment, and inventory.
- Financing of a project that involves the relocation of an industry or business from one area of Ohio to another. Exceptions will be made by the state on a case-by-case basis, but only if the relocation of an industry or business will create additional jobs, and the industry or business furnishes information to the state which demonstrates that the industry or business could not continue to operate in the existing location. Also, the applicant community must send a letter (by certified mail) to the community from which the business is relocating, explaining the reasons for relocation. The letter must include OCD's address and identify the OCD Economic Development Coordinator as the contact person.
- Financing of speculative projects or buildings. Speculative buildings include those that do not have tenant commitments for at least 50% of the floor space or where project resources may not be sufficient to cover expenses.

Prohibition on Assistance for Job-Pirating Activities: CDBG regulations prohibit providing assistance that will result in the relocation of a plant, facility or operation from one Labor Market Area to another, as defined by the Ohio Department of Development's Office of Community Development, within three years of the date of assistance, if such relocation will likely result in a significant loss of jobs in the labor market area from which the relocation occurs. A significant loss is defined as the loss of the lesser of 500 jobs or 1/10th of one percent of the total labor force in the labor market area through the relocation of jobs, but in all circumstances, 25 or fewer jobs will not be considered a significant loss. Federal Register/Vol. 71, No. 100/May 24, 2006/Rules and Regulations/24 CFR Part 570/Prohibition on Use of Community Development Block Grant Assistance for Job-Pirating Activities. Map 1 on page 78 shows the OCD-defined labor market areas,)

Application Timing: Project applications will be accepted on a continuous basis, beginning on June 13, 2012.

Application Submission: The funding application will be available on OCD's website prior to the June 13, 2012 start of the program year. OCD will review the application and provide a written response to the applicant community within 30 days of submission. A funding decision will be made within 45 days of receipt of a complete application. **Communities are required to hold two public hearings before submitting a complete application to the State. The general public hearing may count as the first public hearing if the hearing includes information on the CDBG Economic Development Program.**

The applicant community must submit one bound original, plus one copy of the complete application.

Administrative Costs: Units of general local government receiving grants for economic development projects shall be allowed a maximum of $10,000, for general administration and implementation. Counties applying on behalf of other jurisdictions are limited to the same ceiling on administrative costs. For projects in which the $500,000 maximum is requested, administration funds must be subtracted from the total project award. Applicants requesting substantially less than the full amount allowed will receive special consideration.

Repayment/Program Income: Under the FY 2012 Ohio Small Cities CDBG Program, funds awarded to units of general local government for economic development projects, and the subsequent program income which may be generated, may not need to be repaid to the state of Ohio, if all funds are expended by the grantee in the same manner as the activity (economic development) which generated the program income, provided that the local grantee has an existing and satisfactorily performing economic development Revolving Loan Fund. Funds not to be expended in that same manner must receive prior approval from the State. The State reserves the right to recapture local program income from communities that fail to adequately meet statutory and regulatory requirements. Any program income derived by the grantee through the administration of economic development funds must also be expended according to applicable Federal and State statutory and regulatory requirements. Smaller units of government that do not have an ongoing grant relationship with OCD, or an existing Revolving Loan Fund, will be required to arrange Revolving Loan Fund agreements with the county in which they are located.

OCD will evaluate the grantee's ability to effectively administer a local Revolving Loan Fund at the time of application approval. If it is determined that the local Revolving Loan Fund is not being satisfactorily administered, collateral effectuation, promissory notes, and loan repayments must be provided to the State. A determination on what constitutes a "satisfactorily administered" economic development Revolving Loan Fund is the sole discretion of the State.

Closing Binder: An executed Closing Binder, comprised of all documents which show that the project is ready to move forward, must be received and acknowledged by OCD prior to the expenditure of CDBG funds.

Drawdown Procedure: An owner's cash equity must be expended first. Once that has occurred, all the other public and/or private funds must be expended on a prorated basis with the CDBG funds. Waivers to this policy will be granted for exceptional cases and only upon prior written approval by OCD.

Number of Grant Awards: A project (site specific) may receive one award up to a maximum of $500,000 in a program year. No business may receive additional CDBG assistance until the business has completed its most recent prior CDBG project, in compliance with all requirements, and created/retained all the jobs to which the business committed. In addition, the prior grant must have been monitored and closed prior to consideration of an additional request.

Local Program Benefit: At least 51 percent (51%) of the jobs created and/or retained must be made available to persons from households of low or moderate income, as defined by the CDBG program. Job creation attributable to the CDBG-supported project must take place within 24 months of project completion. Project completion means the point in time when all construction or machinery installation involved in the project has been completed, which cannot be later than the work completion date specified in the Grant Agreement.

Job Documentation: The business may utilize the Ohio Department of Job and Family Services (ODJFS) and obtain a certification from that agency that a minimum of 51% of the jobs created were for persons of low- and moderate-income households. If ODJFS is not utilized, the business must maintain the following data on each employee hired or retained and each individual interviewed for a job:

(1) Name of person;
(2) Household size of the person; and
(3) Total household income of the person being interviewed (this should be done as an over/below answer relating to the median family income for each family size).

If an employee resides in or is employed in a census tract where not less than 70% of the residents have incomes at or below 80% of the area median income, the employee is presumed to be a low- and moderate-income person. Such a presumption can also be made if an employee lives in a census tract or block group in which at least 20% of the residents are below the poverty level, or if the assisted business and the job under consideration are located in a census tract or block group in which at least 20% of the residents are low- and moderate-income. The same census tract criteria would apply to employees living in or employed in a federal empowerment zone or enterprise community.

This information, in either form, must be available in the community's program file as proof that the CDBG national objective was met.

Program Amendments: Because of the nature of the application and grant award, which are based on rating criteria, economic development grantees are discouraged from changing their programs. The OCD Amendment Policy is stated on page 145.

Local Program Period: Economic development grantees will be allowed up to 14 months to have their FY 2012 grant(s) ready for closeout, beginning with the date of grant agreement execution. Within this allowable program period, the following deadlines must be met: (1) all activities must be completed by the end of the 12th month; (2) all funds must be drawn down by the end of the 13th month; and (3) all funds must be expended, the final performance report must be submitted, and the local program must be ready to be closed out by the end of the 14th month. Audit(s) of this grant must be conducted in accordance with OMB Circular A-133, described in the OCD Financial Management Rules and Regulations Handbook. If a project will not be completed within the time frame identified above, an alternative local program period must be requested at the time of application and approved prior to project commencement.

Appropriate Analysis: Under the Economic Development Loan Program, assistance is provided to private for-profit businesses for eligible activities, where the assistance is

appropriate to carry out an economic development project. In order to ensure that any such assistance is not unreasonably high, the State will conduct an analysis to determine that the amount of any financial assistance to be provided is not excessive, taking into account the actual needs of the business in making the project financially feasible and the extent of public benefit expected to be derived from the economic development project.

Rating System Principles: An Economic Development Loan Program application must meet minimum program thresholds and eligibility criteria. The Economic Development Loan Program application will allow OCD to determine feasibility and fundability of the proposed project. **Meeting minimum threshold requirements does not guarantee funding of the project**.

Program thresholds include the following:

(1) a project must create and/or retain at least five full-time, permanent jobs in the private sector;

(2) at least 51% of the full-time, permanent jobs created and/or retained must be taken by or made available to persons from households of low and moderate income;

(3) the CDBG cost per job must not exceed $25,000; however, to be competitive, an applicant must keep this ratio (CDBG cost per job) as low as possible;

(4) each CDBG dollar must leverage at least another dollar of other public or private investment in the project's fixed asset cost;

(5) in order to be eligible for a CDBG loan, a borrower must be prepared to devote cash, equal to at least five percent (5%) of the total project's non-infrastructure fixed asset cost, to the project's fixed assets. Prior to approval of the loan by OCD, the borrower must demonstrate sufficient cash on hand to meet this qualification. Borrowed cash does not meet this qualification; and,

(6) at least fifteen percent (15%) of a project's fixed asset cost must be privately financed; this may include owner/developer's cash equity contribution.

OCD will assess the application to determine whether the funding being requested is appropriate to meet Federal and State economic development objectives. The following rating criteria will be used to evaluate project applications:

(1) Program Effectiveness (60 points): Cost per job, job quality, recapture terms of CDBG funds, credit analysis, leverage ratio and percentage of equity contribution.

(2) Program Impact (24 points): downtown location, use of a vacant building, coordination, with other public programs, extensive spin-off potential, significant community impact and public benefit, use of Ohio made products/materials, export business, new enterprise, high low- and moderate-income person job commitment, Appalachian area location, low percentage of awarded administrative funds.

(3) Distress (16 points): Unemployment rate according to the latest monthly report and the percent of low- and moderate-income population in the county.

B. Economic Development Public Infrastructure Grant Program

Goal: The principal goal of the Economic Development Public Infrastructure Grant Program is to create and retain permanent, private-sector job opportunities, principally for low- and moderate-income persons, through the expansion and retention of business and industry in Ohio communities.

Grant Ceiling. , $500,000 maximum for off-site infrastructure projects. Maximum grant ceiling includes project and program administration costs.

Eligible Jurisdictions: Non-entitlement cities and counties. Counties must apply on behalf of villages and townships; counties may also apply on behalf of cities within their jurisdiction.

Revolving Loan Fund Participation: Local units of government will be required to substantially disburse any existing Revolving Loan Fund balance in conjunction with or prior to the submission of a funding application to the State for a specific economic development project.

Eligible Activities: Eligible activities include provision of financial assistance, through eligible units of general local government, for public improvements directly and primarily related to the creation, expansion or retention of a particular business. Financing under the State CDBG Economic Development Public Infrastructure Program is designed to cover public infrastructure investment directly related to business or industrial development. The amount and type of financial assistance provided to a project must be deemed appropriate with respect to the financial gap and the public benefit to be derived.

Ineligible Activities:

- Financing of a project that involves the relocation of an industry or business from one area of Ohio to another. Exceptions will be made by the state on a case-by-case basis, but only if the relocation of an industry or business will create additional jobs, and the industry or business furnishes information to the state which demonstrates that the industry or business could not continue to operate in the existing location. Also, the applicant community must send a letter (by certified mail) to the community from which the business is relocating, explaining the reasons for relocation. The letter must include OCD's address and identify the OCD Economic Development Coordinator as the contact person.

- Financing of speculative projects. Speculative projects include those that do not have an identified business or industrial development as an end user for the public infrastructure or where project resources may not be sufficient to cover expenses.

- Financing of site preparation or infrastructure improvements owned by or on the site of an identified business or industrial development. Site preparation and on-site infrastructure improvements are eligible CDBG Economic Development Loan Program activities.

Prohibition on Assistance for Job-Pirating Activities: CDBG regulations prohibit providing assistance that will result in the relocation of a plant, facility or operation from one Labor Market Area to another, as defined by the Ohio Department of Development's Office of Community Development, within three years of the date of assistance, if such relocation will likely result in a significant loss of jobs in the labor market area from which the relocation occurs. A significant loss is defined as the loss of the lesser of 500 jobs or 1/10th of one percent of the total labor force in the labor market area through the relocation of jobs, but in all circumstances, 25 or fewer jobs will not be considered a significant loss. Federal Register/Vol. 71, No. 100/May 24, 2006/Rules and Regulations/24 CFR Part 570/Prohibition on Use of Community Development Block Grant Assistance for Job-Pirating Activities. Map 1 on page 78 shows the OCD-defined labor market areas,)

Off-Site Infrastructure Activities: While infrastructure is an eligible activity, the applicant community must demonstrate need for the level of funding requested. Infrastructure funding will be based on the following guidelines:

(1) If the infrastructure improvement is on-site, it must be in the form of a loan to the business. Such projects will be considered with an application to the CDBG Economic Development Loan Program.

(2) OCD will require community, business and/or other financial participation toward the infrastructure costs. CDBG can only fund a portion of the minimum infrastructure necessary to adequately serve the business. In addition, applicants are reminded that CDBG funds can be used as either loans or grants. The department encourages communities to utilize negotiating methods and thorough discussion which, if appropriate, may result in a partial payback of CDBG funds to the community for future CDBG eligible activities. Such practice is not required and will not impact the department's decision in awarding CDBG funds. Any payments made to the community as a result of infrastructure repayment negotiations are maintained by the community in their Revolving Loan Fund as a source of revenue to pay for infrastructure or other eligible projects in the future.

(3) CDBG economic development funding for the off-site infrastructure portion of projects will be scaled according to local area distress, as follows:

- Counties which are not distressed may receive up to 50% of the total off-site infrastructure costs.
- Counties which are distressed may receive up to 60% of the total off-site infrastructure costs.
- Counties which are highly distressed may receive up to 75% of the total off-site infrastructure costs.

Note: For the purpose of this program, distressed areas in the State are determined by ODOD's Office of Policy Research and Strategic Planning, based on unemployment rate, per capita income, poverty, and ARC distress criteria (see Map 2, page 79).

Areawide Downtown Projects: Areawide infrastructure projects in a community's defined central business district will not be funded under the Economic Development Public Infrastructure Grant Program. The Community Development Program is an available funding source for downtown-related infrastructure projects.

Application Timing: Project applications will be accepted on a continuous basis, beginning on June 13, 2012.

Application Submission: The funding application will be available on OCD's website prior to the June 13, 2012 start of the program year. OCD will review the application and provide a written response to the applicant community within 30 days of submission. A funding decision will be made within 45 days of receipt of a complete application. **Communities are required to hold two public hearings before submitting a complete application to the State. The general public hearing may count as the first public hearing if the hearing includes information on the CDBG Economic Development Public Infrastructure Grant Program.**

The applicant community must submit one bound original, plus one copy of the complete application.

Administrative Costs: Units of general local government receiving grants for economic development projects shall be allowed a maximum of $10,000, for general administration and implementation. Counties applying on behalf of other jurisdictions are limited to the same ceiling on administrative costs. For projects in which the $500,000 maximum is requested, administration funds must be subtracted from the total project award. Applicants requesting substantially less than the full amount allowed will receive special consideration.

Repayment/Program Income: Under the FY 2012 Ohio Small Cities CDBG Program, funds awarded to units of general local government for economic development projects, and the subsequent program income which may be generated, may not need to be repaid to the state of Ohio, if all funds are expended by the grantee in the same manner as the activity (economic development) which generated the program income, provided that the local grantee has an

existing and satisfactorily performing economic development Revolving Loan Fund. Funds not to be expended in that same manner must receive prior approval from the State. The State reserves the right to recapture local program income from communities that fail to adequately meet statutory and regulatory requirements. Any program income derived by the grantee through the administration of economic development funds must also be expended according to applicable Federal and State statutory and regulatory requirements. Smaller units of government that do not have an ongoing grant relationship with OCD, or an existing Revolving Loan Fund, will be required to arrange Revolving Loan Fund agreements with the county in which they are located.

OCD will evaluate the grantee's ability to effectively administer a local Revolving Loan Fund at the time of application approval. If it is determined that the local Revolving Loan Fund is not being satisfactorily administered, collateral effectuation, promissory notes, and loan repayments must be provided to the State. A determination on what constitutes a "satisfactorily administered" economic development Revolving Loan Fund is the sole discretion of the State.

Closing Binder: An executed Closing Binder, comprised of all documents which show that the project is ready to move forward, must be received and acknowledged by OCD prior to the expenditure of CDBG funds.

Drawdown Procedure: An owner's cash equity must be expended first. Once that has occurred, all the other public and/or private funds must be expended on a prorated basis with the CDBG funds. Waivers to this policy will be granted for exceptional cases and only upon prior written approval by OCD.

Number of Grant Awards: A project (site specific) may receive one award up to a maximum of $500,000 in a program year. No business may benefit from additional CDBG assistance until the business has completed its most recent prior CDBG project, in compliance with all requirements, and created/retained all the jobs to which the business committed. In addition, the prior grant must have been monitored and closed prior to consideration of an additional request.

Local Program Benefit: At least 51 percent (51%) of the jobs created and/or retained must be made available to persons from households of low or moderate income, as defined by the CDBG program. Job creation attributable to the CDBG-supported project must take place within 24 months of project completion. Project completion means the point in time when all construction or machinery installation involved in the project has been completed, which cannot be later than the work completion date specified in the Grant Agreement.

Benefit Documentation for Public Improvements: The unit of local government receiving a CDBG public improvement award to create and/or retain jobs must prepare an assessment identifying any businesses located or expected to locate in the area to be served by the public improvement. The assessment must project all jobs that are expected to be created or retained for the one-year period after the completion of the public improvement. Jobs created by businesses that locate in the area as a result of the public improvement at any time during the three-year period are considered for purposes of meeting the 51% LMI benefit national objective. If, however, the amount of CDBG assistance provided for the public improvement in relation to the number of jobs projected to be created/retained, as identified in the assessment, is such that the amount per job is less than $10,000, the jobs created by businesses not identified in the assessment do not need to be considered.

Job Documentation: The business may utilize the Ohio Department of Job and Family Services (ODJFS) and obtain a certification from that agency that a minimum of 51% of the jobs created were for persons of low- and moderate-income households. If ODJFS is not utilized, the business must maintain the following data on each employee hired or retained and each individual interviewed for a job:

(1) Name of person;
(2) Household size of the person; and

(3) Total household income of the person being interviewed (this should be done as an over/below answer relating to the median family income for each family size).

If an employee resides in or is employed in a census tract where not less than 70% of the residents have incomes at or below 80% of the area median income, the employee is presumed to be a low- and moderate-income person. Such a presumption can also be made if an employee lives in a census tract or block group in which at least 20% of the residents are below the poverty level, or if the assisted business and the job under consideration are located in a census tract or block group in which at least 20% of the residents are low- and moderate-income. The same census tract criteria would apply to employees living in or employed in a federal empowerment zone or enterprise community.

This information, in either form, must be available in the community's program file as proof that the CDBG national objective was met.

Program Amendments: Because of the nature of the application and grant award, which are based on rating criteria, economic development grantees are discouraged from changing their programs. The OCD Amendment Policy is stated on page 145.

Local Program Period: Economic development grantees will be allowed up to 14 months to have their FY 2012 grant(s) ready for closeout, beginning with the date of grant agreement execution. Within this allowable program period, the following deadlines must be met: (1) all activities must be completed by the end of the 12th month; (2) all funds must be drawn down by the end of the 13th month; and (3) all funds must be expended, the final performance report must be submitted, and the local program must be ready to be closed out by the end of the 14th month. Audit(s) of this grant must be conducted in accordance with OMB Circular A-133, described in the OCD Financial Management Rules and Regulations Handbook. If a project will not be completed within the time frame identified above, an alternative local program period must be requested at the time of application and approved prior to project commencement.

Appropriate Analysis: Under the Economic Development Public Infrastructure Grant Program, assistance is provided to private for-profit businesses for eligible activities, where the assistance is appropriate to carry out an economic development project. In order to ensure that any such assistance is not unreasonably high, the State will conduct an analysis to determine that the amount of any financial assistance to be provided is not excessive, taking into account the actual needs of the business in making the project financially feasible and the extent of public benefit expected to be derived from the economic development project.

Rating System Principles: An Economic Development Public Infrastructure Grant Program application must meet minimum program thresholds and eligibility criteria. The Economic Development Public Infrastructure Grant Program application will allow OCD to determine feasibility and fundability of the proposed project. **Meeting minimum threshold requirements does not guarantee funding of the project**.

Program thresholds include the following:

(1) a project must create and/or retain at least five full-time, permanent jobs in the private sector;

(2) at least 51% of the full-time, permanent jobs created and/or retained must be taken by or made available to persons from households of low and moderate income;

(3) the CDBG cost per job must not exceed $9,999.99 for off-site infrastructure projects; however, to be competitive, an applicant must keep this ratio (CDBG cost per job) as low as possible;

(4) each CDBG dollar must leverage at least another dollar of other public or private investment ;

(5) at least fifteen percent (15%) of a project's fixed asset cost must be privately financed; this may include owner/developer's cash equity contribution.

OCD will assess the application to determine whether the funding being requested is appropriate to meet Federal and State economic development objectives. The following rating criteria will be used to evaluate project applications:

(1) Program Effectiveness (60 points): Cost per job, job quality, percentage of community contribution for infrastructure, credit analysis, leverage ratio and percentage of equity contribution.

(2) Program Impact (24 points): downtown location, use of a vacant building, coordination, with other public programs, extensive spin-off potential, significant community impact and public benefit, use of Ohio made products/materials, export business, new enterprise, high low- and moderate-income person job commitment, Appalachian area location, low percentage of awarded administrative funds.

(3) Distress (16 points): Unemployment rate according to the latest monthly report and the percent of low- and moderate-income population in the county.

C. Residential Public Infrastructure Grant Program

Goal: The primary goal of the Residential Public Infrastructure Grant Program is the creation of a safe and sanitary living environment for Ohio citizens, through the provision of safe and reliable drinking water and proper disposal of sanitary waste.

Grant Ceiling: The awards may not exceed $600,000. The maximum award for public infrastructure is $600,000.

Eligible Jurisdictions: Non-entitlement counties, cities and villages. Counties must apply on behalf of unincorporated areas and villages that do not have a demonstrated capacity to operate a public water or wastewater system (note **Memorandum of Understanding policy** below). Cities and villages will be limited to one grant award per program year. Counties will be limited to four awards per program year. A county may receive two grant awards for applications submitted on behalf of itself and two on behalf of one or more eligible sub-units of general local government (villages and cities) within the county jurisdiction. Jurisdictions which were funded under this program in FY 2011 will not be eligible for funding under the FY 2012 program; however, counties which were funded in FY 2011 are allowed to apply on behalf of a different sub-unit of government within their jurisdiction.

Memorandum of Understanding: To facilitate the construction of a project funded through the CDBG Residential Public Infrastructure Grant Program, a grantee may be permitted to enter into a Memorandum of Understanding (MOU) with a local water or sewer district and/or a non-profit water company, so that it can implement the project. The local water or sewer district and/or a non-profit water company must be the sole or part owner of a contract funded with CDBG dollars for construction of the water or facility improvements. Grantees will be required to obtain prior written approval from OCD to enter into an MOU before submitting a grant application. The grantee will retain responsibility for assuring that the project meets all of the conditions of the grant agreement with OCD.

Local Capacity: Applicants must be able to demonstrate an ability to operate a water or wastewater system. Villages that currently lack both systems will be considered as not having capacity. Applicants must also be able to show the long-term financial viability of a proposed project.

Eligible Activities: The Residential Public Infrastructure Grant Program will only fund projects which provide water and/or sanitary sewer service to primarily residential users (minimum 60% of total users). Eligible on-site improvements include service laterals, septic tanks and well abandonment, and CDBG-eligible related fees. Applications where the primary objective is the funding of on-site improvements will not be considered for funding.

Local Program Benefit: The program is targeted to distressed communities or areas in Ohio which have a low- and moderate-income population of at least 51%.

Administrative Cost: A maximum of 5% or $10,000, whichever is less, of the total grant amount may be used for general administration, environmental review, audit and close-out. In addition, a maximum of 5% of the funds expended for on-site improvements may be used for costs directly related to the delivery of this activity up to a maximum of $5,000.

Program Benefit Survey: The grantee may qualify a project on the basis of the most current Census Data or an income survey of the benefit area (or service area) of an activity according to the OCD Survey Methodology which shows that at least 51% of the activity beneficiaries will be of low or moderate income. The grantee is required to submit appropriate survey information with the original application to the State. Use of any additional database will be allowed through prior OCD approval.

Program Amendments: Because of the nature of the application and grant award, which are based on rating criteria, Residential Public Infrastructure Grant Program grantees are discouraged from changing their programs. OCD will consider on a case-by-case basis only those minor changes that do not affect the competitiveness of their approved applications for which the original grant award was made. If the grantee is considering a change in program scope, location or design, number and type of beneficiaries or anticipated accomplishments, it must notify OCD of the proposed changes in writing. Formal written OCD approval is required.

Local Program Period: FY 2012 Residential Public Infrastructure Grant Program grantees must complete their programs according to the following deadlines: (1) all activities (except audit and balance of administration) must be completed by the end of the 24th month; (2) all drawdown requests must be submitted to OCD by the end of the 25th month; and (3) all funds must be disbursed and expended, and a final performance report must be submitted by the end of the 26th month. Audits of this grant must be conducted in accordance with OMB Circular A-133, as described in the OCD Financial Management Rules and Regulations Handbook.

Cities and villages with one open Residential Public Infrastructure Grant Program grant and counties with two open Residential Public Infrastructure Grant Program grants are not eligible to apply.

Commitment of Formula Allocation Funds: Grantees committing Fiscal Year 2012 Formula Allocation grant funds to FY 2012 Residential Public Infrastructure Grant Program projects must reprogram the Formula Allocation funds to other CDBG eligible activities if the Residential Public Infrastructure Grant Program application is not approved by December 31, 2012.

Revolving Loan Fund Participation: Local units of government will be required to substantially disburse any existing Revolving Loan Fund balance in conjunction with or prior to the submission of a funding application to the State for a specific water and sewer project.

Application Submission: Funding applications may be submitted beginning June 13, 2012. The state will review the application and provide the applicant a written status report within four weeks of submission.

Readiness to Proceed: Project design must be completed prior to application submission. Applicants submitting projects requiring Ohio Environmental Protection Agency (EPA) review and approval must provide documentation of the Ohio EPA's approval with the application.

Direct Benefit Assistance: Applicants must address the way in which eligible low- and moderate-income households will connect to a new water or sanitary sewer service if funding for on-site improvements is not requested.

Assessments and Fees:

(1) Definition of special assessment: The term "special assessment" means a fee or charge levied or filed as a lien against a parcel of real estate as a direct result of benefit derived from the installation of a public improvement, such as streets, water or sewer lines, curbs, and gutters. The amount of the fee represents the prorated share of the capital costs of the public improvement levied against the benefiting properties or a one-time charge made as a condition of access to the public improvement. This term does not relate to taxes, or the establishment of the value of real estate for the purpose of levying real estate, property, or ad valorem taxes, nor does it include periodic charges based on the use of public improvements, such as water or sewer user charges, even if such charges include the recovery of all or some portion of the capital costs of the public improvement.

(2) Special assessments to recover capital costs: Where CDBG funds are used to pay all or part of the cost of a public improvement, special assessments may be used to recover capital costs as follows:

(a) Special assessments to recover the CDBG funds may be made only against properties owned and occupied by households not of low and moderate income. **Such assessments constitute program income**.

(b) Special assessments to recover the non-CDBG portion may be made provided that CDBG funds are used to pay the special assessment on behalf of all properties owned and occupied by low- and moderate-income households; except that CDBG funds need not be used to pay the special assessments on behalf of properties owned and occupied by moderate-income households if the grant recipient certifies that it does not have sufficient CDBG funds to pay the assessments on behalf of all the low- and moderate-income, owner-occupant households. **Funds collected through such special assessments are not program income**.

(3) Other uses of CDBG funds for special assessments: Program funds may be used to pay all or part of special assessments levied against a property when such assessments are used to recover the capital cost of eligible public improvements financed solely from sources other than CDBG funds, provided that:

(a) The assessment represents that property's share of the capital cost of the improvements;

(b) The installation of the public improvements was carried out in compliance with requirements applicable to activities assisted under this part of the CDBG regulations including environmental, citizen participation, and Davis-Bacon requirements; and

(c) The installation of the public improvement meets a national objective criterion.

NOTE:

(1) Under this program, special assessments cannot be paid for low- or moderate-income persons where the public improvement itself does not meet a national objective.

(2) "To pay" an assessment for a low- or moderate-income person means to pay 100% of the assessment in the form of a grant.

Rating System Principles:

A Residential Public Infrastructure Grant Program application must meet minimum program thresholds and eligibility criteria. The Residential Public Infrastructure Grant Program application will allow OCD to determine feasibility and fundability of the proposed project. **Meeting minimum threshold requirements does not guarantee funding of the project**.

Program thresholds include the following:

(1) Leverage: The requested CDBG Water and Sanitary Sewer Program funds must, at a minimum, be matched on a one-for-one basis with funds from other sources. The other funds can be non-Water and Sanitary Sewer CDBG funds, as well as funds from other public or private sources.

(2) Program Impact: The project must alleviate the identified health hazard (this does not include fire hazards) or replace a functionally obsolete facility. A functionally obsolete facility is defined as a water treatment plant, wastewater treatment plant or water storage structure that is at least 40 years old and the cost of repairing the facility is greater than the cost of building a new facility.

- (3) Community's Financial Capacity and Rate Structure: Water and/or sewer fees must be in line with the following requirements:
  -
  - For an area without a water or sanitary sewer system:
  - User fees for a new water system must be at least 1% of the area median household income (MHI) or $30/month, whichever is less.
  - User fees for a new sanitary sewer system must be at least 1% of the area MHI or $30/month, whichever is less.

For an area without a **sanitary sewer system** that is interested in improving an existing **water system**, user fees for the water system must be at least 1% of the MHI or $30/month, whichever is less.

For an area **without a water system** that is interested in improving an existing **sanitary sewer system**, user fees for the sanitary sewer system must be at least 1% of the MHI or $30/month, whichever is less.

For an area **with a water system** that is interested in constructing a new **sanitary sewer system**, combined user fees must be at least 2% of the area MHI or $60/month, whichever is less.

For an area **with a sanitary sewer system** that is interested in constructing a new **water system**, combined user fees must be at least 2% of the area MHI or $60/month, whichever is less.

For an area with both a water system and a sewer system that is interested in improving either system, combined user fees must be at least 2% of the area MHI or $60/month, whichever is less.

(4) Readiness to Proceed: Project design must be completed prior to application submission.

Applicants submitting projects requiring Ohio Environmental Protection Agency (EPA) review and approval must provide documentation of the Ohio EPA's approval and Permit to install with the application.

All applications will be rated according to the following criteria:

(1) Benefit Impact (35 points): Percent of low- and moderate-income persons, and total number of persons benefiting from the program;

(2) Leverage (10 points): Each CDBG dollar must leverage at least $1 dollar of other public or private funds in the approved project cost;

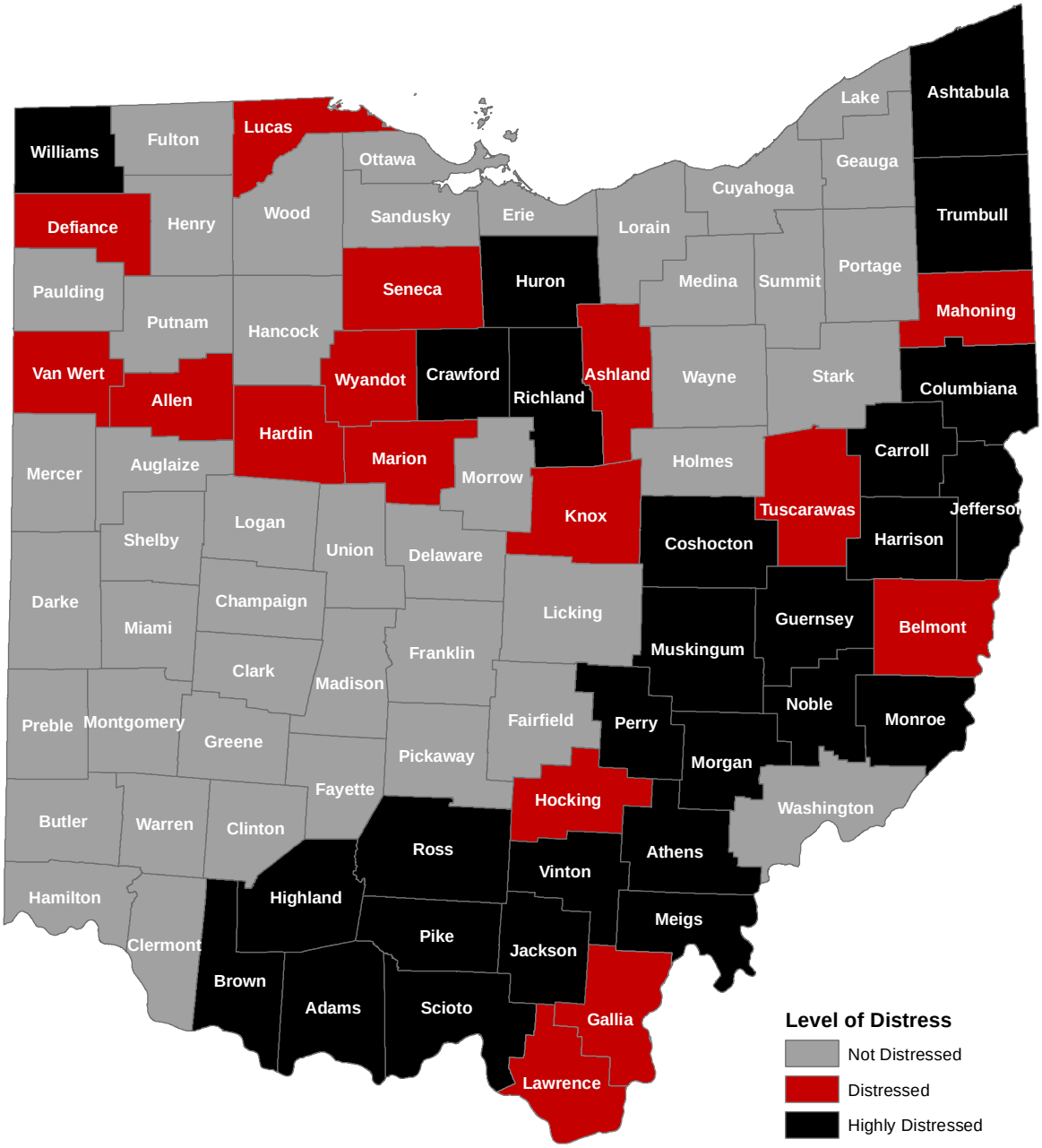
(3) Program Impact (25 points): Communities under EPA mandates with documented health and safety concerns will be given priority (relationship of proposed activities to identified needs);

(4) Regionalization (10 points): The applicant is a part of a regional system, which is defined by the following criteria: a system established under Sections 6103, 6117 and 6119 of the ORC; a system connected to another system for the provision of water or treatment of wastewater, a non-profit system that serves more than one political subdivision; a for-profit system (not company) that serves more than one political subdivision, and a public system that has entered into long term operating agreement with another public entity.

(5) Community's Financial Capacity and Rate Structure (20 points): The community's ability to raise funds locally through user fees.

Map 1: 2012 Ohio CDBG Economic Development Program Labor Market Areas

Map 2: FY 2012 Ohio Distressed Counties



Source: Ohio Department of Development,
Office of Policy Research and Strategic Planning

Prepared by the Office of Community Development,
Community Services Division,
Ohio Department of Development (December 2011)

3. Comprehensive Downtown Revitalization Program

Goals: The principal goals of the Comprehensive Downtown Revitalization Program are:

(1) to assist in the revitalization of Central Business Districts;
(2) to aid in the elimination of slums or blight;
(3) to create and retain permanent, private-sector job opportunities, principally for persons from low- and moderate-income households; and,
(4) to assist in the successful implementation of the National Trust for Historic Preservation's Four-Point Main Street Approach to downtown revitalization (i.e., Design, Organization, Promotion and Economic Restructuring).

Total Funds: This program has been suspended for FY 2012. Therefore, no new funds will be available. Funds recaptured from prior Comprehensive Downtown Revitalization Program grants may be allocated to the FY 2012 Discretionary Program for eligible downtown-related projects.

Eligible Jurisdictions: Non-entitlement cities, counties, and villages. Counties may also apply on behalf of villages or cities.

Purpose and Programmatic Design: Comprehensive Downtown Revitalization Program funds are designed to provide financial assistance to eligible CDBG non-entitlement communities as a primary step in a community's establishment of a comprehensive and holistic downtown revitalization program and subsequent process. The Office of Community Development' (OCD) downtown program funds are earmarked for use toward the physical aspects of downtown revitalization. As such, OCD' downtown program incorporates three categories of funding --- Downtown Revitalization Planning; Downtown Building and Streetscape Revitalization; and Downtown Targets of Opportunity --- to reflect three possible scenarios of the physical redevelopment process involved in the revitalization of a central business district (CBD).

Eligible applicants may submit applications for one or more categories of funding as follows: Downtown Revitalization Planning only; Downtown Building and Streetscape Revitalization only; Downtown Targets of Opportunity only; or Downtown Revitalization Planning and Downtown Targets of Opportunity simultaneously (i.e., during the same program year). Downtown Building and Streetscape Revitalization funds cannot be awarded the same program year as either Downtown Revitalization Planning or Downtown Targets of Opportunity program funds.

Local Program Benefit/National Objective: Communities **must** qualify activities under the HUD Ohio Small Cities CDBG program national objective of prevention/elimination of slum or blight.

To qualify under the HUD National Objective of Prevention/Elimination of Slum or Blight, the designated geographic area or building, whatever the case may be, must meet the state or local legal definition of a slum or blighted and/or deteriorated or deteriorating area or building in which there is a substantial number or percentage of deteriorated or dilapidated buildings/building elements AND/OR deteriorated public infrastructure elements. For the purposes of this definition, substantial is defined as at least 51% of the target area or building, whatever the case may be. See specific information under each of the three tiers of CDBG downtown revitalization program funding for particular details relevant to each tier of funding.

All activities funded under the slum or blight national objective must address one or more of the conditions that qualified the area or building as slum or blighted (i.e., streetscape revitalization, interior building code violation corrections, exterior facade and building code violation corrections, etc.). In addition, **slum or blight activities involving building rehabilitation are limited to building facade improvements and/or interior/exterior building code violation corrections.**

Communities qualifying a project under the "elimination of slum or blight" national objective are required to submit either a statement signed by the applicant community's Chief Executive Officer (CEO) or a resolution passed by the governing legislative body, which declares the target area or building as slum or blighted and/or deteriorated or deteriorating, based upon state or local law (e.g., building codes, etc.). This statement or resolution must detail the conditions of the program target area or building site at the time of its designation (i.e., building conditions surveys and/or infrastructure surveys must have been conducted or updated within the 12-month period immediately prior to application submission to OCD to document the appropriate designation). Also, a copy of a map, either identifying the boundaries of both the area identified in the local designation defined as slum or blighted and the proposed program target area or the location of the building designated as slum or blighted, must be provided with the statement or resolution to OCD. All survey information relative to the identified area(s)/building must be maintained by the program applicant and submitted as part of the program application process.

Communities are required to hold two public hearings before submitting a complete application to the State. The general public hearing may count as the first public hearing if the hearing included information on the CDBG Comprehensive Downtown Revitalization Program.

Program Income: Program income derived through the administration of the Comprehensive Downtown Revitalization Program funds must be expended by the grantee in the same manner as the activity (downtown revitalization), which generated the program income. Program income funds that will not be expended in the same manner must be returned to the state. Program income must also be expended according to applicable Federal and State laws, as well as OCD guidelines. Locally developed Revolving Loan Fund guidelines must be approved by OCD.

Revolving Loan Fund Participation: Local units of government will be required to substantially disburse any existing Revolving Loan Fund balance in conjunction with or prior to the submission of a funding application to the State for a specific downtown revitalization project.

Downtown Inventory or Building Conditions Survey: See specific information under each of the three tiers of CDBG downtown revitalization program funding for details pertaining to each relevant tier of funding.

CDBG Federal Requirements: It should be noted that since CDBG funds are federal funds, all pertinent federal funds requirements must be adhered to, followed, and documented. These include but may not be limited to the following: Citizen Participation, Environmental Review/Release of Funds Review; Section 106 Review including coordination with the Ohio Historic Preservation Office (OHPO), Davis Bacon Prevailing Wage Rates, Uniform Relocation and Real Property Acquisition Act (URA), the Barney Frank Amendment, Fair Housing Law, American with Disabilities Act (ADA); etc.

Program Amendments: Due to the nature of the Comprehensive Downtown Revitalization Program (i.e., in particular, the competitiveness of the program) and the nature of the applications and resulting grant awards, program grantees are **strongly discouraged** from making any changes to their approved programs/scopes of work. Therefore, amendments granted to approved programs will be considered during future funding application reviews, and points may be lost.

Heritage Ohio Membership: Comprehensive Downtown Revitalization Program applicants demonstrate a commitment to downtown revitalization by belonging to the statewide, non-profit organization, "Heritage Ohio." **Program grantees, or locally designated downtown revitalization entities, are required to belong to "Heritage Ohio."**

Ohio Main Street Program: Comprehensive Downtown Revitalization Program applicants demonstrate a commitment to a comprehensive and holistic downtown revitalization approach

by working to become designated as an Ohio Main Street Community by Heritage Ohio.

Eligible CDBG community applicants may be designated as: an Ohio Main Street Community (designated by Heritage Ohio), an emerging Main Street Community (as designated by Heritage Ohio), or a Non-Main Street community. At each level of designation, an eligible applicant is able to apply for funds available under any one of the three CDBG downtown revitalization program tiers of funding.

Applicant communities that are designated as Ohio Main Street Communities or designated as an emerging Ohio Main Street Community at the time of application will receive additional points in the application review process.

The following outlines the details of each tier available under the Comprehensive Downtown Revitalization Program.

Downtown Revitalization Planning:

Total Funds: This program has been suspended for FY 2012. Therefore, no new funds will be available. Funds recaptured from prior Comprehensive Downtown Revitalization Program grants may be allocated to the FY 2012 Discretionary Program for eligible downtown-related projects.

Grant Ceiling: Maximum of $15,000

Applicant Status: Applicants will be required to identify the community/downtown as one of three categories: an Ohio Main Street Community (i.e., a community designated as such by Heritage Ohio), a potential Main Street Community (i.e., a community working to become designated as an Ohio Main Street Community), or a Non-Main Street Community (i.e., a community choosing not to become designated as an Ohio Main Street Community).

Additional points will be awarded during the review process to those communities that are designated as either Ohio Main Street Communities or potential Ohio Main Street Communities at the time of application. In addition, points will be awarded to communities on a sliding scale basis relative to population/size.

Local Program Benefit/National Objective: Applicant communities must show the potential to apply for and use future CDBG Downtown Building and Streetscape Revitalization downtown revitalization program funds in order to fulfill relevant slum or blight national objective requirements.

Leverage Requirements: A minimum of a $1:$1 of other funds (including non-downtown CDBG funds) to downtown CDBG funds requested. Additional points will be awarded on a sliding scale basis to those communities exceeding this match requirement.

Eligible Activities: Planning activities funded through this program must result in tangible products that are directly applicable to and linked with the establishment and implementation of a downtown revitalization strategy for the community. Examples of eligible planning activities include, but are not limited to, the following: research and preparation of revisions to or creation of downtown zoning ordinances, building codes, historic districts, etc.; development of design review criteria/revitalization guidelines and related processes for review and enforcement; development or update of a comprehensive downtown market analysis; development or update of a comprehensive downtown revitalization and development plan including analysis of existing conditions, downtown mission and goals, objectives for goal attainment, plan concept development, phasing, and strategies for financing and implementing revitalization activities; development of a marketing strategy/operations plan to ensure the sustainability and on-going viability of the downtown; and preparation of a comprehensive economic and/or financial downtown revitalization feasibility analysis.

Administrative Costs: Grant Administration costs are not eligible.

Ineligible Activities: Activities that do not result in tangible, useable products to aid in the development, establishment and implementation of a comprehensive downtown revitalization program for the community's downtown; engineering and architectural drawings related to specific work to be completed for a specific project located within the downtown, etc. Architectural and engineering costs can only be paid for under Downtown Building and Streetscape Revitalization or Downtown Revitalization Planning at which time project specific work is to occur. Engineering, architectural, and legal service costs related to activities undertaken with CDBG Downtown Building and Streetscape Revitalization or Downtown Revitalization Planning funds can be charged to the relative specific line item.

Application Timing: This program has been suspended for FY 2012.
Grant Award: This program has been suspended for FY 2012.

Local Program Period: FY 2012 Comprehensive Downtown Revitalization Program awardees must complete their program according to the following deadlines: (1) all activities must be completed by the end of the 12th month; (2) all funds must be drawn by the end of the 13th month; and (3) all funds must be expended, final performance report must be submitted, and the local program must be ready to be closed out by the end of the 14th month. Audit(s) of this grant must be conducted in accordance with OMB Circular A-133, described in the Ohio OCD Financial Management Rules and Regulations Handbook.

Rating System Principles: Minimum program thresholds include the following:

(1) Documentation that the proposed activities are part of a larger comprehensive and holistic movement and desire for downtown revitalization to occur within the community (e.g., driven by community leaders and/or residents).

(2) Substantial documentation indicating that the proposed activities will incorporate a comprehensive, all-inclusive approach designed to obtain input from various downtowns and community stakeholders such as an existing downtown organization(s), downtown businesses, downtown building owners, downtown and community residents, local government officials, and other community leaders.

(3) Evidence that the National Trust for Historic Preservation's Four Point approach to Main Street (Design, Organization, Promotion, and Economic Restructuring) will be incorporated into the proposed planning activities, whenever appropriate and plausible.

(4) Documentation that the proposed activities will actually lead to the potential to establish and implement a downtown revitalization program for the community.

(5) Assurance that the proposed planning activity (ies) will be completed within a maximum of 12 months.

(6) Evidence of a firm financial commitment in cash from the local government for at least 10% of the CDBG downtown program amount requested; points will be awarded on a sliding scale based upon the amount of financial participation by the community (up to a maximum of 20% cash participation) relative to the status (i.e., Ohio Main Street Community, Potential Main Street Community, Non-Main Street Community) and size of the community.

(7) Documentation that firm financial commitments exist for a minimum of $1:$1 leverage of other funds (including non-downtown CDBG funds) to downtown CDBG funds (in-kind match will be considered for up to 40% of the match commitment). OCD will have the final determination with respect to which funds are designated as matching funds/in-kind.

(8) The total amount of CDBG funds requested is less than or equal to $15,000.

(9) Grantees, or the locally designated downtown revitalization entity, is or becomes a member of Heritage Ohio within three months of the receipt of a grant award.

(10) The provision of evidence that the proposed activities are needed and necessary in order for the community to apply for Downtown Building and Streetscape Revitalization program funding under the Comprehensive Downtown Revitalization Program.

OCD will rate proposals on the following selected criteria:

(1) Adequacy and comprehensiveness of proposed activities and processes relative to the defined problem(s) of the CBD (20%);

(2) Evidence supporting and documenting the existence of the problem(s) identified in the downtown that are to be addressed by this activity, study, process, etc. and future revitalization efforts (10%);

(3) Degree to which proposed activities (including amount and type of financial leverage provided) will result in a tangible product designed specifically to aid in the development of a solid foundation for the establishment and implementation of downtown revitalization activities eligible to receive Downtown Building and Streetscape Revitalization Comprehensive Downtown Revitalization Program funding (30%);

(4) Degree to which resulting products will help to ensure the presence of capacity to bring downtown revitalization to fruition (25%); and

(5) Reasonableness of the design of the proposed activities and processes to ensure on-going sustainability and maintenance of the downtown once revitalization is complete (15%).

OCD reserves the right to adjust funding levels between program categories according to project/program requests and relative funding availability.

Downtown Building and Streetscape Revitalization

Total Funds: This program has been suspended for FY 2012. Therefore, no new funds will be available. Funds recaptured from prior Comprehensive Downtown Revitalization Program grants may be allocated to the FY 2012 Discretionary Program for eligible downtown-related projects.

Grant Ceiling: This program has been suspended for FY 2012.
Applicant Status: Applicants will be required to identify the community/downtown as one of three categories: an Ohio Main Street Community (i.e., a community designated as such by Heritage Ohio), an emerging Main Street Community (i.e., as designated as such by Heritage Ohio), or a Non-Main Street Community (i.e., a community not designated as an Ohio Main Street Community). Additional points will be awarded during the review process to those communities that are either designated as Ohio Main Street Communities or potential Ohio Main Street Communities at the time of application. In addition, points will be awarded to communities on a sliding scale basis relative to population/size.

Local Program Benefit/National Objective: Communities must qualify activities under the HUD Ohio Small Cities CDBG program national objective of prevention/elimination of slum or blight.

To qualify under the HUD National Objective of Prevention/Elimination of Slum or Blight, the designated geographic area must meet the state or local legal definition of a slum, blighted or deteriorated or deteriorating area in which there is a substantial number of deteriorated or dilapidated buildings/building elements AND/OR deteriorated public infrastructure elements. For the purposes of this definition, substantial is defined as: 1) at least 51 percent of the

buildings AND infrastructure within the defined downtown target area, OR 2) in those particular cases where prior work has been completed (i.e., work related to infrastructure improvements OR building improvements, etc.), and a minimum of 51% of the buildings in the target area OR a minimum of 51% of the infrastructure in the target area remains deteriorated, then either the buildings OR the infrastructure shall be considered as slum or blighted. Under the latter scenario, the applicant must submit additional documentation to OCD documenting that blighting conditions for either aspect of the downtown not being proposed for redevelopment (i.e.,buildings OR infrastructure) has been virtually, if not entirely, eliminated. All activities funded under the slum or blight national objective must address one or more of the conditions that qualified the area as slum or blighted, i.e., streetscape revitalization, interior building code violation corrections, exterior facade and building code violation corrections. **In addition, slum or blight activities involving building rehabilitation are limited to building facade improvements and/or interior/exterior building code violation corrections.**

Communities qualifying a project under the "elimination of slums or blight" national objective are required to submit either a statement signed by the applicant community's Chief Executive Officer (CEO) or a resolution passed by the governing legislative body, which declares the area slum or blighted and/or deteriorated or deteriorating, based upon state or local law. This statement or resolution must detail the conditions of the program target area at the time of its designation (i.e., building conditions surveys and/or infrastructure surveys must have been conducted or updated within the 12-month period immediately prior to application submission to OCD to document the appropriate designation). Also, a copy of a map, identifying the boundaries of both the target area identified in the local designation defined as slum or blighted and the proposed program target area, must be provided with the statement or resolution to OCD. All survey information relative to the identified area(s) must be maintained by the program applicant and submitted as part of the program application process.

Downtown Inventory: Applicants must survey the downtown program target area (which may include either the entire CBD or a portion of the downtown) and provide information about the condition, age, and use of private and public buildings, as well as infrastructure, as part of the application process. This information is required to be submitted by all Tier Two applicants. All specific survey information relative to the identified target area must be maintained by the applicant, as well as be submitted in summary form to OCD as part of the application process.

Leverage Requirements: A minimum of $1:$1 of other funds (including non-downtown CDBG funds) to downtown CDBG funds requested.

Eligible Activities: Eligible activities include but are not limited to: uniform façade and sign improvements; interior and exterior building code violation corrections; streetscape activities; other eligible CDBG infrastructure and rehabilitation activities; administrative costs directly related to the downtown program; and architectural and engineering work related to specific revitalization activity(ies). Parking improvements will only be eligible on a case-by-case basis and with prior written approval from OCD.

Administrative Costs: Public, non-profit, or private for-profit entities can administer financial assistance for downtown revitalization activities. A maximum of twenty percent (20%) of the total grant amount or $60,000, whichever is less, will be allowed for eligible administration and implementation costs. These administrative costs include program implementation and oversight, preparation of environmental review, audit, and closeout activities. Engineering, architectural and legal service costs related to activities undertaken with CDBG funds can be charged to the relative specific line item budget activity.

Ineligible Activities: The following activities are not eligible to receive CDBG funds under Tier Two: the development or redevelopment of speculative projects or buildings; the restructure or refinance of existing debt(s); the provision of working capital; the purchase or refinance of noncapital equipment; the provision of training costs; the provision of inventory costs; the provision of activities which are related to specific downtown promotional events (i.e., festivals, parades, etc.), and the costs associated with preparing plans and studies related to the implementation of downtown revitalization activities.

Application Submission Requirements:

This program has been suspended for FY 2012.

Grant Award: This program has been suspended for FY 2012.

Local Program Period: FY 2012 Comprehensive Downtown Revitalization Program Downtown Building and Streetscape Revitalization grantees will be allowed up to 26 months to have their FY 2012 downtown programs ready for closeout, beginning with the date of grant agreement execution. The following items must be completed within the 26-month program period: (1) all activities must be completed prior to the end of the 24th month; (2) all funds must be drawn before the end of the 25th month; and (3) all funds must be expended, a final performance report submitted to OCD, and the local program ready to be closed by the end of the 26th month. Audit(s) of this grant must be conducted in accordance with OMB Circular A-133, described in the Ohio OCD Financial Management Rules and Regulations Handbook.

Program Rating System Principles: **Minimum** program thresholds include the following:

(1) The provision of evidence that an active downtown management or business association has existed for at least two years with the purpose of promoting or coordinating downtown revitalization activities. The application must demonstrate that a substantial number of the downtown businesses and building owners belong to the organization, and, as such, they provide active support to and involvement with the organization.

(2) The submission of a downtown market analysis that has been either completed, or updated, and adopted within the last five years and is currently being used in the implementation of downtown revitalization activities. This analysis must be based on the following: the area's economic climate and makeup (including merchants' surveys); local competing commercial entities such as shopping centers/malls; consumer demand for products and/or services (including consumer surveys); and the feasibility of development in the downtown. The proposed downtown program should directly relate to and/or provide assistance to the implementation of findings from the market analysis. Evidence should exist to indicate that findings from the market analysis were used in the formulation of the proposed downtown program. The community's submission must include a copy of the legislation adopting the downtown market analysis.

(3) A downtown development plan must be submitted that has been either completed, or updated, and adopted within the last five years and that is currently being implemented. The proposed downtown program, for which funds are being sought, must be congruent with this plan. The community's submission must include a copy of the legislation adopting the downtown development plan.

(4) Communities must also demonstrate that architectural design standards, applicable to the downtown target area, are in place, have been adopted by the local legislative body, and are being enforced (i.e., a design review process is in place and active). These standards must incorporate the Secretary of Interior's Standards for Rehabilitation. The community's submission must include a copy of the legislation adopting the Secretary of the Interior's Standards for Rehabilitation.

(5) The community must show that it has established a promotional and marketing plan and/or strategy for the downtown that is being implemented while downtown revitalization is occurring and will continue to be implemented once physical revitalization is complete. This plan/strategy must be based upon consumer and/or

market surveys that substantiate the particular approach being taken by the community.

(6) At a minimum, 20% of the buildings in the defined downtown target area must be physically improved. Firm private financial commitments are required as evidence that improvements will be made. Note: The local program design needs to incorporate the severity of existing code violations in the prioritization of work to be completed. Targeted activities must be located within the Central Business District (CBD). Communities may undertake a revitalization program in a portion of the downtown provided the area is cohesive and well defined. Applicants must submit a building map of the downtown area indicating the boundaries of the downtown target area and the location of the proposed revitalization activities.

(7) Documentation that the proposed program will meet the slum or blight CDBG national objective.

(8) A minimum of $1:$1 leverage of other funds (including non-downtown CDBG funds) to downtown CDBG funds must be met. OCD will have the final determination with respect to which funds are considered leveraged and designated as matching funds.

(9) Evidence of a firm financial commitment from the local government for at least 10% of the CDBG downtown program amount requested. This financial commitment must be in addition to funds normally committed for local staff. NOTE: While assessments are an excellent way to generate project dollars, these funds will only count toward the leverage threshold and integrated effort (i.e., additional revitalization work). The local government financial commitment (e.g., 10% minimum) must be achieved without assessment dollars.

(10) The maximum allowable request for CDBG funds for administration is the lesser of $60,000 or 20% of the total amount of CDBG funds requested/awarded (i.e., a maximum of twenty percent (20%) of the total grant amount or $60,000, whichever is less, will be allowed for administration and implementation – See “Administrative Costs” on page 82.

(11) A designated local person must be identified to work as a project coordinator for administration of day-to-day downtown revitalization activities.

Proposal/Application Evaluation: OCD will rate those applications that meet all of the program thresholds based upon the following criteria:

(1) Community Distress (10 points**):** unemployment rate, per capita income, and LMI population;

(2) Program Financing (15 points**):** leverage of CDBG, other public and private funds, as well as the proposed program financing mechanism and the reasonableness of total project costs;

(3) Physical Impact and Design (15 points): previous revitalization efforts in the CBD and the impact of the physical improvements to the targeted downtown buildings, infrastructure, and overall target area;

(4) Program Strategy (20 points): viability of approach to rehabilitation, economic restructuring, design, and promotion of the downtown district; degree of comprehensiveness incorporated into the strategy; type and degree of local participation in the physical revitalization process; extent to which jobs will be created and/or retained; effectiveness of the use of CDBG funding; and overall program design and process.

(5) Program Feasibility/Implementation (25 points): feasibility, overall strength, and validity of the proposed community downtown program strategy and potential ease of implementation; the anticipated degree of increased long-term sustainability and marketability of the downtown; and the extent to which the program can feasibly incorporate the Main Street Four Point Approach, clarity of the implementation process; and

(6) Capacity/Organization (15 points): administrative capacity of the community, downtown organization, and other program administrators (i.e., consultants, etc.) to implement the downtown revitalization program; proposed coordination between various revitalization activities, entities, etc.; and past CDBG performance.

Preliminary Threshold Application:

1) The provision of evidence that an active downtown management or business association has existed for at least two years with the purpose of promoting or coordinating downtown revitalization activities. Demonstration that a substantial number of the downtown businesses building owners belong to the organization, and, as such, they provide active support to and involvement with the organization.

2) The submission of a downtown market analysis that has been completed, or updated, and adopted within the last five years and is currently being used in the implementation of downtown revitalization activities. This analysis must be based on the following: the area's economic climate and makeup (including merchants' surveys); local competing commercial entities such as shopping centers/malls; consumer demand for products and/or services (including consumer surveys) and the feasibility of development in the downtown. The proposed downtown program should directly relate to and/or provide assistance to the implementation of findings from the market analysis. Evidence should exist to indicate that findings from the market analysis were used in the formulation of the proposed downtown program. The community's submission must include a copy of the legislation adopting the downtown market analysis.

3) The submission of a downtown development plan that has been completed, or updated, and adopted within the last five years and that is currently being implemented. The proposed downtown program, for which funds are being sought, must be congruent with this plan. The community's submission must include a copy of the legislation adopting the downtown development plan.

4) Demonstration by the applicant community that architectural design standards, applicable to the downtown target area, are in place, have been adopted by the local legislative body, and are being enforced (i.e., a design review process is in place and active). These standards must incorporate the Secretary of Interior's Standards for Rehabilitation. The community's submission must include a copy of the legislation adopting the Secretary of Interior's Standards for Rehabilitation.

5) The community must show that it has established a promotional and marketing plan and/or strategy for the downtown that is being implemented while downtown revitalization is occurring and will continue to be implemented once physical revitalization is complete. This plan/strategy must be based upon consumer and/or market surveys that substantiate the particular approach being taken by the community. Furthermore, initial information pertaining to the four additional thresholds that follow, as indicated, is also to be submitted to OCD as previously noted (i.e., in order for a community to be considered eligible to apply for FY 2012 Downtown Building and Streetscape Revitalization Comprehensive Downtown Revitalization Program funds.

6) Evidence of a designated local person identified to work as a project coordinator for administration of day-to-day downtown revitalization activities or the position description for the person to be hired assuming a grant is awarded to the applicant.

7) Demonstration that, at a minimum, 20% of the buildings in the defined downtown target area will be physically improved; (Note: Only a preliminary target area needs to be defined for the threshold submission).

8) Evidence that targeted activities will be located within the Central Business District (CBD). Communities may undertake a revitalization program in a portion of the downtown provided the area is cohesive and well defined. Applicants must submit a building map of the downtown area indicating the physical boundaries of the downtown target area and the location of the proposed downtown revitalization activities; and

9) Documentation, to the extent possible at the time of the threshold submission, that the proposed program will meet the slum or blight CDBG national objective.

OCD reserves the right to adjust funding levels between tiers according to project and funding availability.

Downtown Targets of Opportunity

Please refer to the CDBG Discretionary Program, Community Development Section on **page 93.** Please note the following information, as well:

Comprehensive Downtown Revitalization Program Downtown Targets of Opportunity applicants will be required to identify the community/downtown as one of three categories: an Ohio Main Street Community (i.e., a community designated as such by Heritage Ohio, Inc.), an emerging Ohio Main Street Community (i.e., a community designated as an emerging Ohio Main Street Community by Heritage Ohio, Inc.), or a Non-Main Street Community (i.e., a community not designated as an Ohio Main Street Community).

Within seven days, OCD will determine the eligibility of the project either by rejecting the proposal or forwarding a discretionary application to the community.

The community will then have 30 days to submit the completed application to OCD.

Structure of Financial Request: It is OCD's goal to structure CDBG Downtown Targets of Opportunity dollars in such a manner as to facilitate some type of repayment at some point during the life of the project/building(s) for which funds are sought and to be no more than 50% of the total project cost.

Requests for Downtown Targets of Opportunity funds should reflect this goal and be structured to take the form of a loan (i.e., a forgivable loan, a loan with a “due-on-sale” clause, a combination loan/grant, etc.), if at all possible, so as to insure the return of at least a portion of CDBG funds to the local community for future use.

Furthermore, requests should be for no more than 50% of the total project cost. OCD will negotiate the terms for Downtown Targets of Opportunity funds with the applicant community based upon each particular project.

Building Conditions Survey: Applicants must conduct a building conditions survey of each of the specific buildings proposed to receive CDBG funds and provide information about the condition, age, and use of the buildings as part of the application process. This information is required to be submitted by all Downtown Targets of Opportunity applicants. All specific survey information relative to the identified building must be maintained by the applicant, as well as be submitted in summary form to OCD as part of the application process. The buildings must undergo an appropriate architectural review process that incorporates the Secretary of the Interior’s Standards for Rehabilitation.

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

Goal: To assist in the development of local microenterprise businesses, and to create and retain long-term jobs in the private sector.

Total Funds: Amount of OHTF/CDC funds have yet to be determined.

Grant Ceiling: Maximum of $60,000.
First time applicants are restricted to a maximum of $40,000.

Eligible Applicants: Must be a 501(c)(3) community-based Internal Revenue Service designated organization, with a focus on development, and be incorporated with the Ohio Secretary of State as a private, non-profit for at least two years.

Application Timing:

CDC Application Submission:	August 3, 2012
CDC Grant Award:	January 1, 2013

Eligible Activities: Microenterprises are commonly defined as for-profit entities with five or fewer employees, one of whom owns the business.

Microenterprises do not generally have access to the commercial banking sector. Therefore, this program intends to provide initial funding for CDC's to further develop a local delivery system that encourages microenterprise business development, and to provide low- and moderate-income persons with access to capital for business development and self-employment.

Eligible activities include the provision of financial assistance through direct or shared loans to private, for-profit entities or individuals to support self-employment and job creation/retention. Training and/or technical assistance to for-profit entities is also eligible and will not be charged against the administrative cap. Working capital loans are also eligible under this program. Every activity assisted with OHTF/CDC funds must meet the low-moderate income benefit, based on HUD Section 8 Income Limits, as discussed below.

OHTF/CDC LMI Benefit: Every activity assisted with OHTF/CDC funds must meet the CDBG Program's national objectives of LMI benefit, as follows.

For OHTF/CDC assisted activities: The microenterprise assisted will create or retain jobs, 51% or more of which will benefit LMI persons. A business assisted under this criteria (funded with OHTF/CDC funds) must have all job applicants complete a Job Benefit Verification Employee Certification form.

Program Income: Any program income resulting from expenditures of CDC Microenterprise funds, may be retained by the grantee to continue their microenterprise program.

Local Program Period: Microenterprise grantees will be allowed up to 20 months to have their programs ready for closeout, beginning with the date of grant agreement execution. Within this allowable program period, the following deadlines must be met: (1) all activities must be completed by the end of the 18th month; (2) all funds must be drawn down by the end of the 19th month; and (3) all funds must be expended, the final performance report must be submitted, and the local program must be ready to be closed out by the end of the 20th month. Audit(s) of this grant must be conducted in accordance with OMB Circular A-133, described in the Ohio CDBG Program Financial Management Rules and Regulations Handbook.

Administrative Cost: A maximum of 10% or less of the total grant amount may be used for general administration, environmental review, audit and closeout.

Rating System Principles: OHTF/CDC program thresholds include the following:

- The organization must be incorporated with the Ohio Secretary of State as a private, non-profit for at least two years;
- The organization must be a dues paying member of the Ohio CDC Association;
- The organization must have its 501(c)(3) designation by the Internal Revenue Service (IRS);
- The non-profit's board must have one-third of its board members determined to be low- and moderate-income persons or representative of low- and moderate-income organizations;
- The non-profit's board must submit a resolution authorizing submission of the application;
- Applicant organization must be community-based and have a development focus;
- Applicant must submit recent financials or an audited financial statement with the application;
- The project must benefit low- and moderate-income persons in the designated target area; and
- For agencies not previously funded with microenterprise funds within the last five years, the agency may not request more than $40,000. The new applicant is limited to no more than $15,000 of the $40,000 request for loan activities.

Rating Criteria

1. Local Capacity/Track Record (30 Points): administrative capacity of the CDC, past performance, staff expertise, previous microenterprise experience and existing grantee must have expended at least 40% of any open Microenterprise grant at the time of application deadline;

2. Program Design/Feasibility (50 Points): marketing strategy, extent of program design includes client screening, training program, loan servicing, appropriateness of funds and project time frame; training and technical assistance costs cannot exceed $25,000 unless documentation available that loan funds are from other sources, and;

3. Program Effectiveness (20 Points): program outcomes, leverage of other public and private funds, and extent proposal generates an income stream.

Program Amendments: Because of the nature of the applications and grant awards, Microenterprise Business Development Program grantees are strongly discouraged from changing their approved programs. The OCD Amendment Policy is stated on page 146.

Other Resources

Discretionary Grant Programs

New Horizons Fair Housing Assistance Program

1. Discretionary Grant Programs

Goal: The goal of the discretionary grant program is to provide a means to fund worthwhile "targets of opportunity" projects and activities that do not fit within the structure of existing programs, and to provide supplemental resources to resolve immediate and unforeseen needs.

Total Funds: Funding is from the following sources: $1,500,000 in FY 2012 CDBG funds; $100,000 in FY 2012 federal ESG funds; SFY 2012 Ohio Housing Trust Funds (amount to be determined by OHTF Advisory Committee). In addition, funds recaptured from prior Comprehensive Downtown Revitalization Program grants may be allocated to the FY 2012 Discretionary Program for eligible downtown-related projects.

Applicant and Project Eligibility:

A. Economic and Community Development: This program will provide funds for "targets of opportunity" investments in:

1. Economic development projects which create and/or retain permanent job opportunities that are not eligible for Economic Development Program funding or feasible within the guidelines of the Economic Development Program.
2. Community development projects that are not feasible in other funding categories.
3. Downtown Targets of Opportunity projects (additional details are outlined on page 89).
4. Imminent threat grants covered by the Federal CDBG Regulation (Section 570.432).

Grant Ceiling: The level of funds is negotiated based upon need. The total funds available for the Comprehensive Downtown Revitalization Program Targets of Opportunity grants cannot exceed 50% of the total FY 2012 CDBG Discretionary funds unless recaptured funds from prior Comprehensive Downtown Revitalization Program grants become available.

Eligible Jurisdictions: Cities, Counties, or Villages

Eligible Activities: Any CDBG-eligible activity

Application Timing: Project applications will be accepted on an open-cycle basis from June 13, 2012 until June 1, 2013 or until such time available for funding has been expended.

OCD reserves the right to adjust funding levels between categories according to project and funding availability.

Program Period: The program period will be determined through negotiations with OCD. Audit(s) of this grant must be conducted in accordance with OMB Circular A-133, described in the OCD Financial Management Rules and Regulations Handbook.

Application Procedures: An eligible community may apply for economic and community development discretionary funds at any time during the FY 2012 program year by submitting a written request for funds including a brief project description to the appropriate OCD staff person (i.e., Field Representative, CHIP Representative, Supportive Housing Representative, Economic Development Coordinator, Water and Sanitary Sewer Coordinator, etc.).

OCD will formally notify the community of its decision to fund or not to fund the community's discretionary project application within 30 days, following OCD receipt of the community's application.

Rating System Principles:

- Project funds are not available from any other source and/or the requested funds fill a "gap;"
- Project is eligible and meets at least one of the CDBG national objectives; and
- Funds are needed to make the project financially feasible.

Program Requirements: CDBG Discretionary grants must be administered according to all applicable Federal and State laws and regulations.

B. **Housing:** This program will provide funds for "target of opportunity" investment in housing projects, special projects, and demonstration programs that are not feasible in other funding categories.

Grant Ceiling: The level of funds is negotiated based on need.

Eligible Jurisdictions: Cities and Counties with an approved CHIS. Non-profit organizations are eligible through the use of HOME funds

Eligible Activities: Any CDBG or HOME eligible activity. Eligibility is determined by the funding source. A maximum of 5% of the total funds awarded can be used for administration.

Application Timing: Project applications will be accepted on a continuous basis, beginning on June 13, 2012.

Program Period: The program period will be determined through negotiations with OCD. Audit(s) of this grant must be conducted in accordance with OMB Circular A-133, described in the OCD Financial Management Rules and Regulations Handbook.

Application Procedures: An eligible community may apply for housing discretionary funds at any time during FY 2012 by submitting a written request for funds including a brief project description to the OCD Residential Revitalization Section Manager. Within seven days, OCD will determine the allowability of the project either by rejecting the proposal or forwarding a discretionary application to the community. The community will then have 30 days to submit the completed application to OCD.

OCD will formally notify the community of its decision to fund or not to fund the community's discretionary project application within 30 days, following OCD receipt of the community's application.

Rating System Principles:

- Project funds are not available from any other source;
- Project is HOME- or CDBG-eligible and must meet at least one of the CDBG national objectives to be eligible for CDBG funds; and
- Funds are needed to make the project feasible.

Program Requirements: CDBG Discretionary grants must be administered according to all applicable Federal and State laws and regulations. Applicants must meet CHIP requirements for fair housing and program income.

C. **Ohio Housing Trust Fund (OHTF) Discretionary Grants:** The OHTF Discretionary Grants provide funding for "target of opportunity" projects and innovative proposals that will principally benefit persons below 50% of the area median income and meet the OHTF rules and requirements.

Grant Ceiling: The level of funds is negotiated based upon need. OHTF Discretionary Grants for individual special projects typically will not exceed $200,000 annually. Applicants whose requests may exceed the $200,000 request first should discuss their project with OCD staff.

Matching Funds: Projects should evidence at least a dollar-to-dollar match in cash and/or direct "in kind" services.

Eligible Applicants: Nonprofit organizations, units of local government, public housing authorities, private developers and lenders and consortia of any eligible applicants.

Eligible Activities: Proposals considered for discretionary funds must be inappropriate for funding from other state housing programs, either because of eligibility, program scope or project timing. Projects must result in identifiable outcomes and beneficiaries (cannot be seed money or start-up funds).

Application Timing: The FY 2012 OHTF Discretionary Grant application submission deadline is March 30, 2012.

Program Period: The program period will be determined through negotiations with OCD. Proposals may request multi-year funding, up to three years.

Application Review: Upon application submission, the application(s) will be reviewed by OCD staff, other state agency staff (if appropriate) and the OHTF Advisory Committee. The Ohio Department of Development Director will make the final decision regarding project funding.

Rating System Principles:

1. Extent to which the project activity impacts low- and moderate-income persons by:

   - improving housing conditions;
   - increasing availability, affordability or accessibility of housing;
   - educating and informing the public about housing issues, including housing counseling; and
   - preventing homelessness, through direct housing assistance or supportive services.

2. Extent to which the project or activity fills an unmet need or gap.

3. Extent to which the project creates or applies innovative techniques, and the extent to which such techniques can be replicated or used as a model.

4. Extent to which the project is to be sponsored/supported by statewide or regional organizations or agencies involved in low-income housing. Preference will be given to statewide projects.

D. Homelessness Discretionary Grants

Approximately $100,000 of FY 2012 Emergency Shelter (ES) Discretionary Program funds and SFY 2013 Ohio Housing Trust Fund dollars (amount to be determined) are available through the FY 2012 Discretionary Program. Eligible applicants are primarily limited to FY 2010 and FY 2011 Homeless Assistance Grant Program grantees.

The priority of the FY 2012 ES Discretionary Program is to provide funds for critical activities at existing OCD-funded shelter locations. As a secondary priority and based on need and availability, these funds may also be used to fund activities of an emergency nature at OCD-funded organizations that serve homeless populations through other supportive housing models as well as organizations providing emergency shelter, but not receiving OCD homeless assistance funds. All activities must be of an emergency nature or include needs that could not be anticipated during the normal funding program cycle.

Application Procedures Applicants must submit an Emergency Shelter Discretionary Program application to OCD at 77 S. High Street, 25th Floor, Columbus, Ohio 43215. OCD will respond within two weeks as to the award decision or to request additional information. Requests for additional information for project/activity review does not guarantee that any one particular request will be funded.

Rehabilitation Project Requirements: Rehabilitation projects will be reviewed for: compliance with local health, building and zoning regulations; evidence of site control, lease agreement or other arrangements for the project; appraisal of property/building; extent to which

financing is secure; reasonableness of proposed budget; and reasonableness of the time frame for completion of the proposed project. Rehabilitation projects must include a detailed, itemized estimate that includes the cost of labor and materials. Estimates must be on the letterhead of an authorized contractor.

Program Period: Grantees must complete their program according to the following deadlines: (1) all activities must be completed by the end of the 12th month; (2) all drawdown requests must be submitted to OCD by the end of the 13th month; (3) all funds must be disbursed and expended, and a final performance report must be submitted by the end of the 14th month.

2. New Horizons Fair Housing Assistance Program

Goal: The primary goal of the New Horizons Fair Housing Assistance Program is to provide funds to units of local government, or consortia of units of local government, to affirmatively further fair housing in addition to activities undertaken with their minimum fair housing program required as part of the submission of Formula Allocation Grant Application and the Community Housing Improvement Program (CHIP) application. Affirmative fair housing strategies are to be based on locally assessed needs and commitments, as well as to further the State's fair housing goal.

Total Funds: $50,000 CDBG funds will be allocated for FY 2012.

Grant Ceiling: Up to $15,000 for one jurisdiction, and up to an additional $5,000 for each additional eligible jurisdiction in a consortium, for a maximum award not exceeding $30,000.

Eligible Jurisdictions: Direct Formula Allocation cities and counties.

Eligible Activities: Implementing analysis of impediments to fair housing strategies; activities to affirmatively further fair housing, actions relating to housing and community development to remedy or mitigate conditions limiting fair housing choice. Activities must be above and beyond the State minimum requirements. (See Local Government Certifications to the State.) Activities may be eligible as administration or public service. A maximum of 15% of the total grant request will be allowed for general administrative and implementation costs.

Application Timing: On-going. Approximately one third of the available funds will be awarded in each four-month cycle, but the State reserves the right to determine the final funding level of each respective cycle.

Application Submission: June 11, 2012 to May 31, 2013.

Rating and Selection Criteria: All applications are reviewed, rated, and scored based on the criteria outlined below. The process is competitive and designed to rank order applicants to be offered funding with the limited amount of New Horizons funds available. Applicants must score at least 72 points to be eligible to be awarded funds.

Threshold Review: Applications that do not meet the minimum threshold requirements will not be scored or funded. Threshold requirements are 1) the (lead) applicant is a Direct Formula grantee, 2) all tables are included and complete, 3) signed by the CEO, 4) authorizing legislation is attached for the applicant and the consortia members, 5) anti-displacement plan is attached, 6) proposed activities are eligible, 7) the program design exceeds the standard fair housing requirements, and 8) previous New Horizon grant programs have been monitored.

Program Design/Impact (40 pts): The significance of benefits of the proposed program in eliminating impediments to fair housing, the benefit to current housing activities and programs, the degree to which the program is designed to create on-going local capacity, the appropriateness and effectiveness of the elements of the proposed program.

Administrative Capacity/Past Performance (30 pts.): The adequacy of the proposed administrative plan, the applicant's experience and capacity for implementing the proposed activities, evaluation of past program performance and compliance.

Cost Effectiveness (20 pts): The degree to which the cost of an outcome is reasonable and appropriate for the proposed activity and the degree to which the cost of general administration is reasonable and appropriate.

Leverage and Coordination (10 pts): A comparison of the amount of funds committed to fair housing in the past 2 years' Community Development Program and the extent to which the proposed program integrate and coordinate with other local programs, funds, and activities

Grant Award: Approximately six weeks after submission.

Program Period: Grantees have until the end of the 12th month to complete activities, all funds must be drawn by the end of the 13th month, and the grant must be closed out and the Final Performance Report must submitted by the end of the 14th month. Audit(s) of this grant must be conducted in accordance with OMB Circular A-133, described in the OCD Financial Management Rules and Regulations Handbook.

Program Amendments: Because of the nature of the applications and grant awards New Horizons Fair Housing Assistance Program grantees are strongly discouraged from changing their approved programs. Amendments may be made only through the 10th month of the program period. The OCD Amendment Policy is stated in the OCD Policy section of OCD's Annual Plan.

Procedures for Processing an Amendment:

1. Call or write the OCD Civil Rights Specialist to discuss the proposed amendment.
2. OCD will then forward a computer-generated amendment form.
3. Fill out the form with the signature of the CEO and return to OCD.
4. OCD will either send the approved executed amendment or notification of a rejection of the amendment.

Program Requirements: Funds awarded under this program must be administered according to all applicable Federal and State laws and regulations.

Programs' Application
Deadlines and Grant Award Cycles

Community Housing Improvement Program

Application Submission:	April 2, 2012
Grant Award:	September 1, 2012

Water and Sanitary Sewer Program

Applications may be submitted on a continuous basis throughout the program year, beginning on June 13, 2012.

Economic Development Program

Applications may be submitted on a continuous basis throughout the program year, beginning on June 13, 2012. Awards will be made approximately 30 days after application submission.

Discretionary Grant Program

Note that the Discretionary Grant Program includes: (A) Economic and Community Development, (B) Housing, (C) Ohio Housing Trust Fund and (D) Homelessness Grants.

Application submissions will be accepted and grant awards will be made throughout the program year, with the Ohio Housing Trust Fund beginning on approximately March 30, 2012 and the other Discretionary Programs due dates on June 13, 2012, based on the availability of funds or deadlines noted in the Discretionary Program guidelines.

New Horizons Fair Housing Assistance Program

Application Submission:	June 11, 2012 through May 31, 2013.
Grant Award:	Approximately six weeks after submission

Comprehensive Downtown Revitalization Program

- **Downtown Revitalization Planning** This program has been suspended for FY 2012.
- **Downtown Building and Streetscape Revitalization** This program has been suspended for FY 2012.
- **Downtown Targets of Opportunity** This program has been suspended for FY 2012.

(continued on next page)

Programs' Application
Deadlines and Grant Award Cycles
(continued from previous page)

Formula Allocation Grants

Application Submission:	June 22, 2012
Grant Award:	September 1, 2012

Neighborhood Revitalization Grants

Application Submission:	June 22, 2012
Grant Award:	September 1, 2012

Community Development Corporations Microenterprise Business Development Program

CDC Application Submission:	August 3, 2012
CDC Grant Award:	January 1, 2012

Homeless Crisis Response Program

Application Submission:	September 5, 2012
Grant Award:	Approximately ten weeks after submission

Supportive Housing Program

Application Submission:	July 11, 2012
Grant Award:	Approximately ten weeks after submission

Housing Assistance Grant Program

Application Submission:	December 14, 2012
Grant Award:	Approximately eleven weeks after submission

Housing Opportunities for Persons With AIDS Program

Application Submission:	November 1, 2012
Grant Award:	Approximately seven weeks after submission

Geographic Distribution of Funds

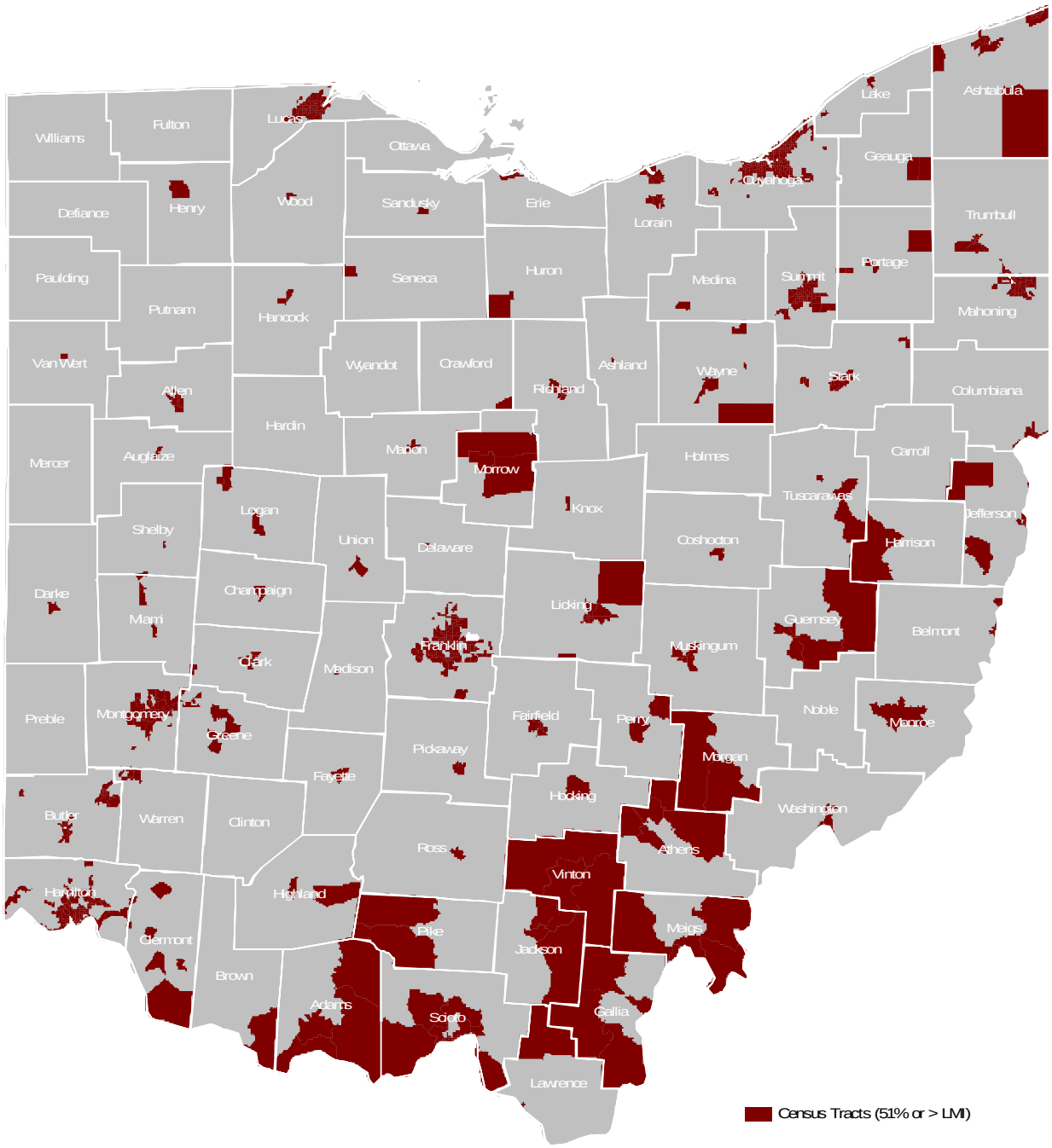
Overall, OCD does not have a geographic targeting strategy, insofar as it does not select areas of the state which will be exclusively awarded funding through a particular program. Such decisions are left to the local communities, which may restrict funding to particular neighborhoods or target specific geographic areas. However, many of OCD's competitive programs prioritize projects and activities that benefit communities with comparatively higher levels of need. However, relative differences in local need is only one of many factors in the decision making process.

The Neighborhood Revitalization Grants that are offered annually through the Community Development Program are the most highly geographically targeted funds. CDBG funds that have yet to be determined are targeted to neighborhoods and communities that are 60% or more low or moderate income, and are intended to address multiple needs in the community to make a significant impact on the overall quality of life in the area. The Community Development Program overall requires that communities receiving Formula Allocation Grants target and expend at least 50% of their funding on local neighborhood target areas and other community needs in their local community development plans (Community Assessment and Strategy).

Map 3 shows the Census Tracts in the state that have populations that are 51% or more low or moderate income, based on the 2000 Census information. Also, Map 4 shows the concentrations of minority households in the state, based on the 2010 U.S. Census minority population data for all census tracts within the state. Many of the lower-income areas have also been designated as targeted Investment Areas in their local communities.

It should be noted that not all of these federal funds are available in all areas of the state and some programs have placed limits on the availability of funds in certain geographic areas, particularly in areas of the state that receive additional direct funding from HUD. These restrictions are noted in the program descriptions in the Program Allocations section of the plan. Maps 5, 6, 7 and 8 show communities that receive direct allocations from the CDBG, HOME, ESG and HOPWA Programs.

Map 3: Ohio Census Tracts with LMI Populations Greater than or Equal to 51%

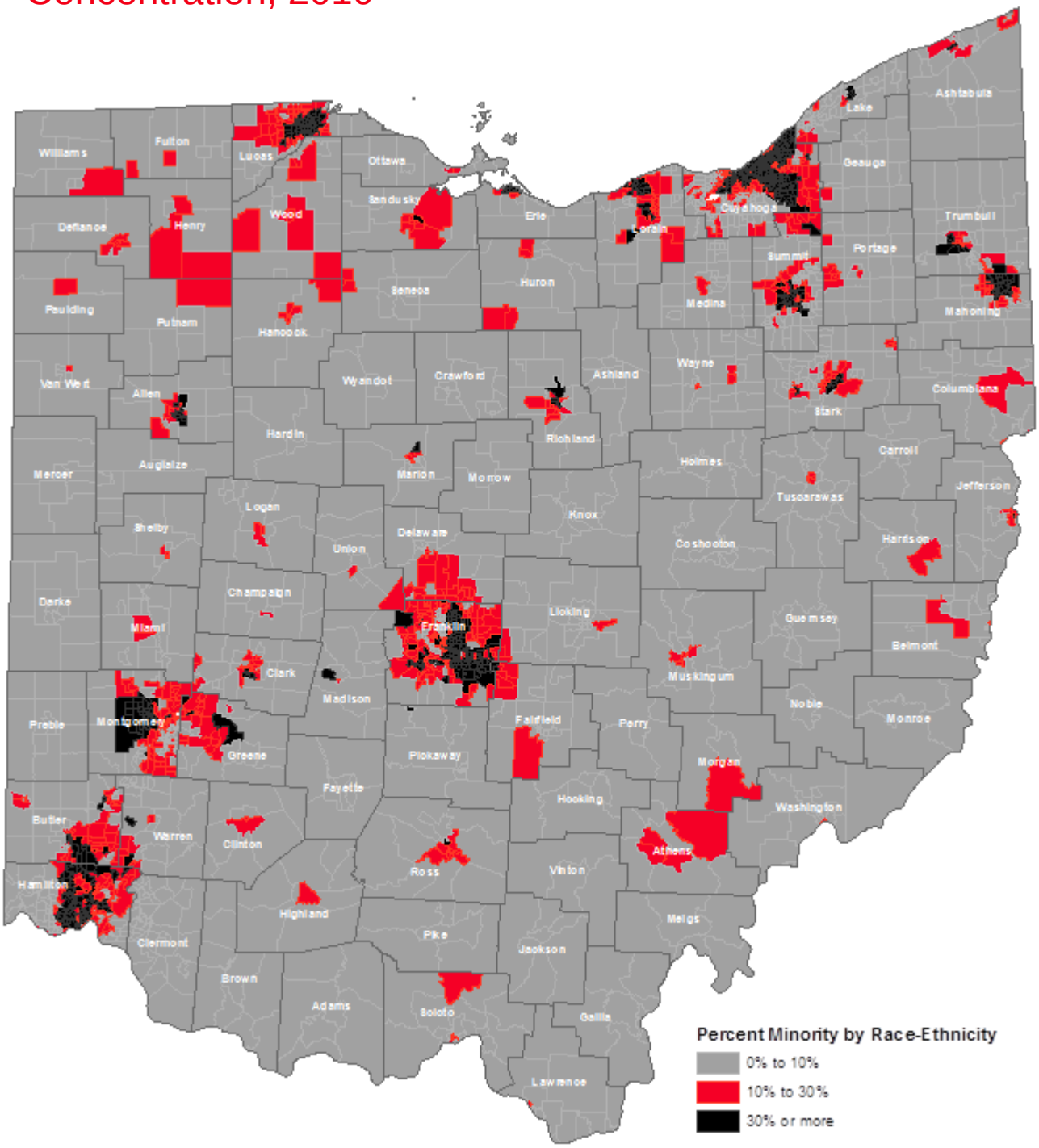


* In addition to these Census Tracts, many Census Blocks and portions of blocks are over 51% LMI. This data is available from OHCP on request, as it is too small of a scale to be viewed on a statewide basis

Source: HUD 2000

Prepared by the Office of Community Development, Community Services Division, Ohio Department of Development (December 2011)

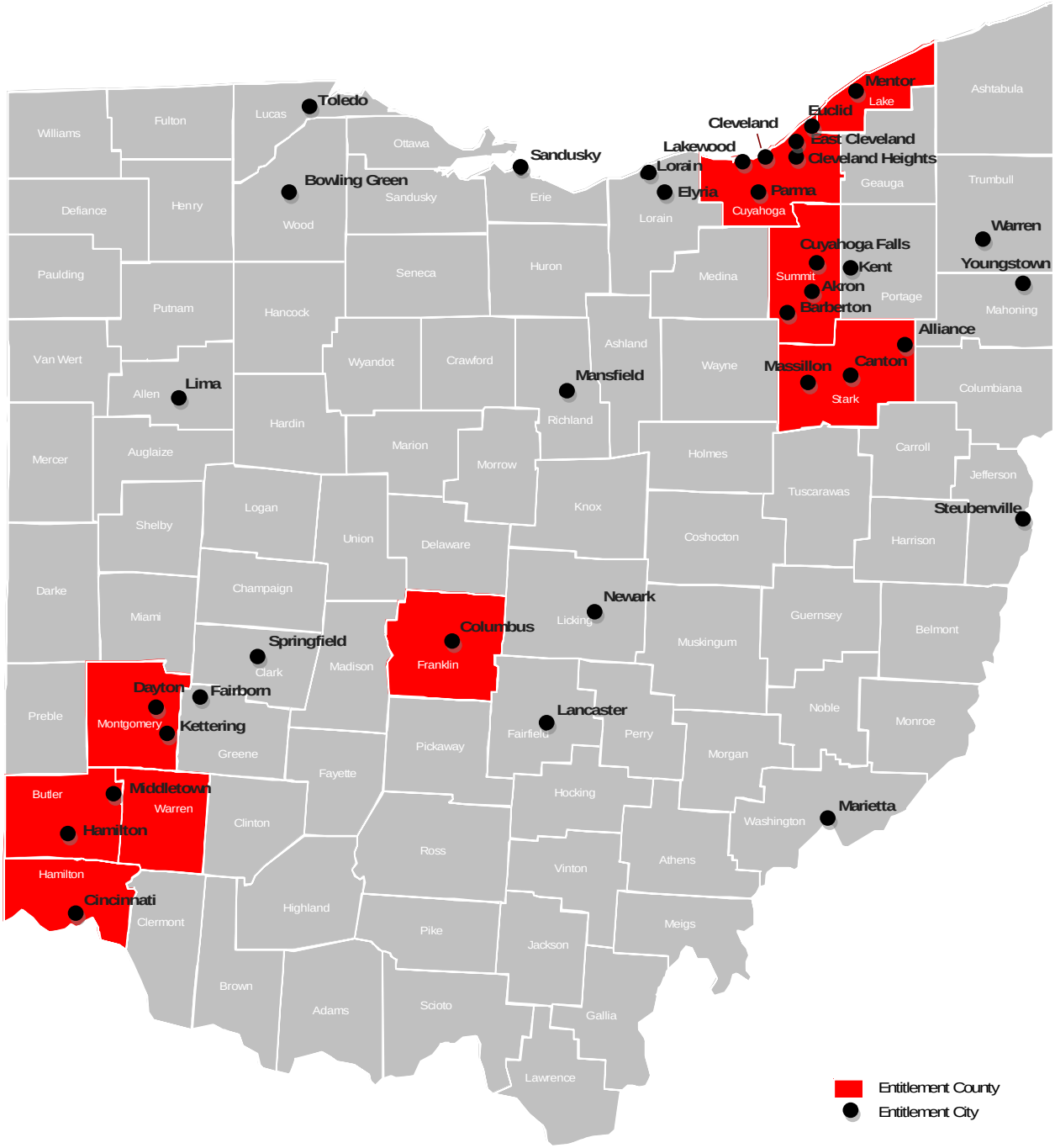
Map 4: Ohio Census Tracts with Areas of Minority Concentration, 2010



Source: 2010 U.S. Census

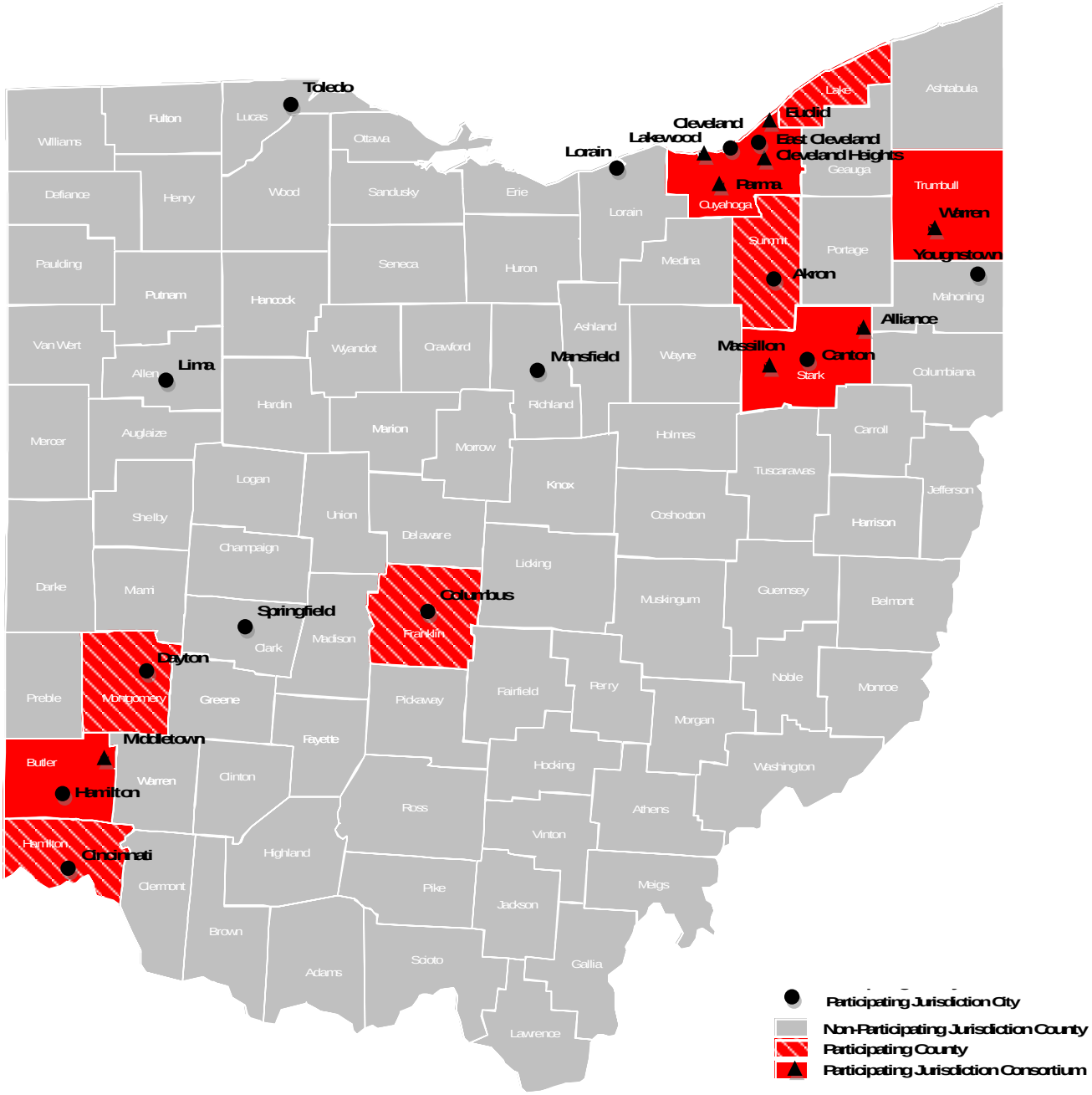
Prepared by the Office of Community Development,
Community Services Division,
Ohio Department of Development (December 2011)

Map 5: U.S. Department of Housing and Urban Development CDBG Program 2012 Entitlement Cities and Urban Counties



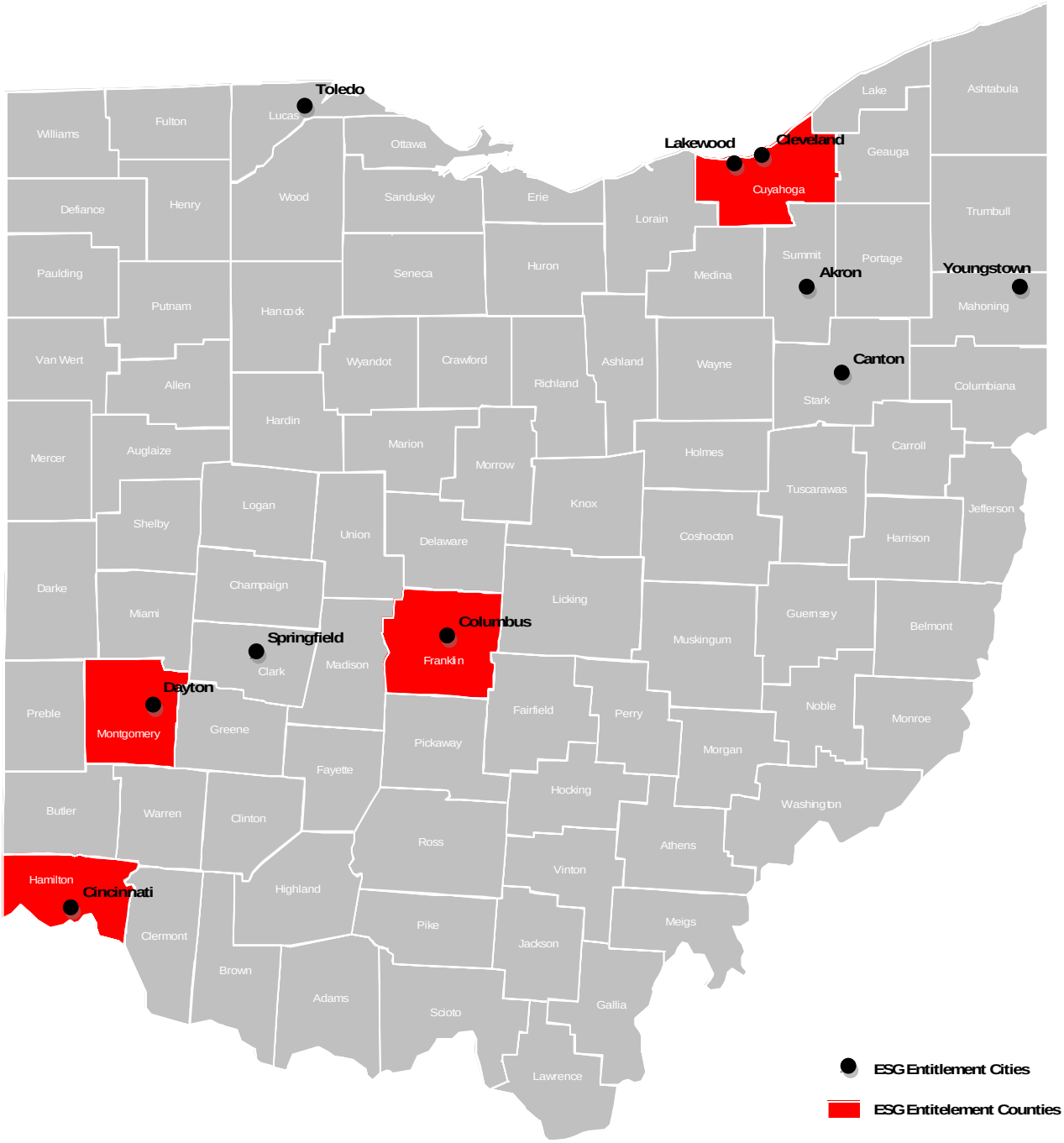
Prepared by the Office of Community Development,
Community Services Division,
Ohio Department of Development (December 2011)

Map 6: U.S. Department of Housing and Urban Development HOME Investment Partnerships Program Participating and Non-Participating Jurisdictions



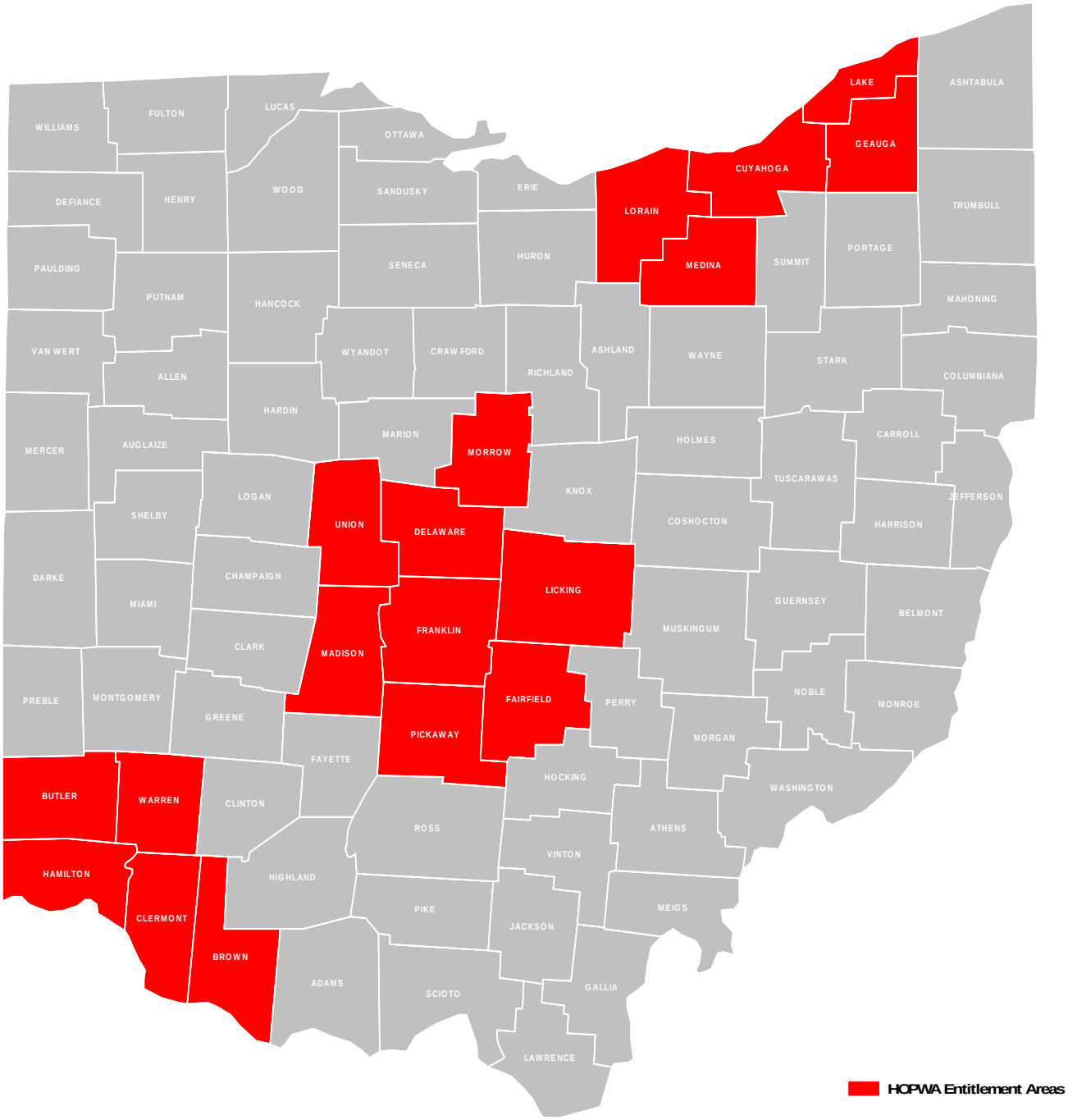
Prepared by the Office of Community Development,
Community Services Division,
Ohio Department of Development (December 2011)

Map 7: U.S. Department of Housing and Urban Development Emergency Shelter Grant Program Entitlement Cities and Urban Counties



Prepared by the Office of Community Development,
Community Services Division,
Ohio Department of Development (December 2011)

Map 8: Housing Opportunities for Persons With AIDS (HOPWA) Entitlement Areas



Prepared by the Office of Community Development,
Community Services Division,
Ohio Department of Development (December 2011)

Homeless and Non-Homeless Special Needs Activities / Continuum of Care Strategy

The state of Ohio will continue its continuum of care approach to homelessness in Ohio. This includes programs and services addressing each stage of the homeless continuum: homeless prevention, emergency shelter, supportive housing, rapid re-housing, permanent supportive housing and aftercare programs.

The state of Ohio has restructured these homeless programs to emphasize priority on preventing individuals and families from experiencing homelessness and, where homelessness does occur, rapidly moving individuals and families into permanent, sustainable housing.

Homelessness Prevention

The state of Ohio will continue to provide financial assistance and services to prevent individuals and families from becoming homeless through the Homeless Crisis Response Program (HCRP) shelter diversion activities. Funds for these activities must be targeted to individuals and families who would be homeless, but for this assistance, and meet the following minimum criteria: 1) have at least an initial consultation with a case manager or other authorized representative who can determine the appropriate type of assistance to meet their needs; 2) be at or below 30 percent of Area Median Income (AMI); and (3) be at risk of losing its housing and having no appropriate subsequent housing options and lacking the financial resources and support networks needed to remain in their existing housing. Eligible assistance includes: short-term or medium-term rental assistance and housing relocation and stabilization services, including such activities as mediation, credit counseling, security or utility deposits, utility payments, moving cost assistance, and case management.

Rapid Re-Housing

The state of Ohio will provide for tenant based (or “transition in place”) rapid re-housing through the Homeless Crisis Response Program (HCRP) shelter diversion activities. Persons served in this category must be homeless according to HUD’s definition and at or below 30 percent of Area Median Income (AMI). Rapid Re-housing programs provide short- or medium-term rental assistance and services for households that are currently homeless, but are likely to sustain housing after the subsidy ends. This assistance can include rental assistance (including back rent for months where the household has been unable to pay), utility deposits, security deposits, and/or moving costs. Housing models that require tenants to move out of their unit at the end of assistance are not eligible under this category.

Emergency Shelter

The state of Ohio will continue to provide Emergency Shelter assistance to homeless families and individuals through the Homeless Crisis Response Program (HCRP). HCRP funds provide emergency shelter and supportive services to homeless persons in Ohio. OCD provides grants to eligible nonprofit organizations and units of local government to maintain, operate and staff emergency shelters for the homeless and to provide essential services to the homeless.

Supportive Housing

The state of Ohio will provide Supportive Housing through the Supportive Grant Program. This will include housing and supportive services designed to help program participants attain permanent housing in a 4 to 24-month period. Housing can be provided in units operated by the agency or in independent rental units in the community.

Permanent Supportive Housing

The permanent supportive housing component of the Supportive Housing Grant Program provides housing and supportive services to maximize the ability of disabled homeless individuals and families to live more independently within the permanent housing environment. Along with housing, these projects provide supportive services including case management, employment assistance and life skills.

Aftercare

Aftercare services are designed to ensure that formerly homeless individuals and families are able to maintain permanent housing. These services include intensive case management and supportive services tailored to the individual's or family's goal of self-sufficiency and permanent housing.

In Ohio, aftercare services to formerly homeless families will be provided through the Homeless Crisis Response Program within the categories mentioned above.

Non-Homeless Special Needs

As in past, the Ohio Department of Mental Health (ODMH) and the Ohio Department of Developmental Disabilities (ODODD) will provide substantial resources and a variety of programs to assist special needs non-homeless populations in the state (see the Resources section of the Consolidated Plan).

ODOD will also provide funding for non-homeless special needs populations through the Housing Opportunities for Persons With AIDS (HOPWA) Program and Housing Assistance Grant Program. The HOPWA Program will provide nonprofit agencies with the resources to devise and implement long-term comprehensive strategies for meeting the housing needs of individuals and families with acquired immunodeficiency syndrome (AIDS) or related diseases. The HOPWA Program provides the following housing and supportive services: short-term emergency rental and utility assistance, operating costs for community residences, assistance with finding affordable permanent housing, case management, respite care, day care, transportation, etc.

The Housing Assistance Grant Program will also continue to fund programs that provide housing assistance to the non-homeless special needs population. The Housing Assistance Grant Program will provide funding to programs that provide emergency home repair and accessibility modifications for low-income seniors.

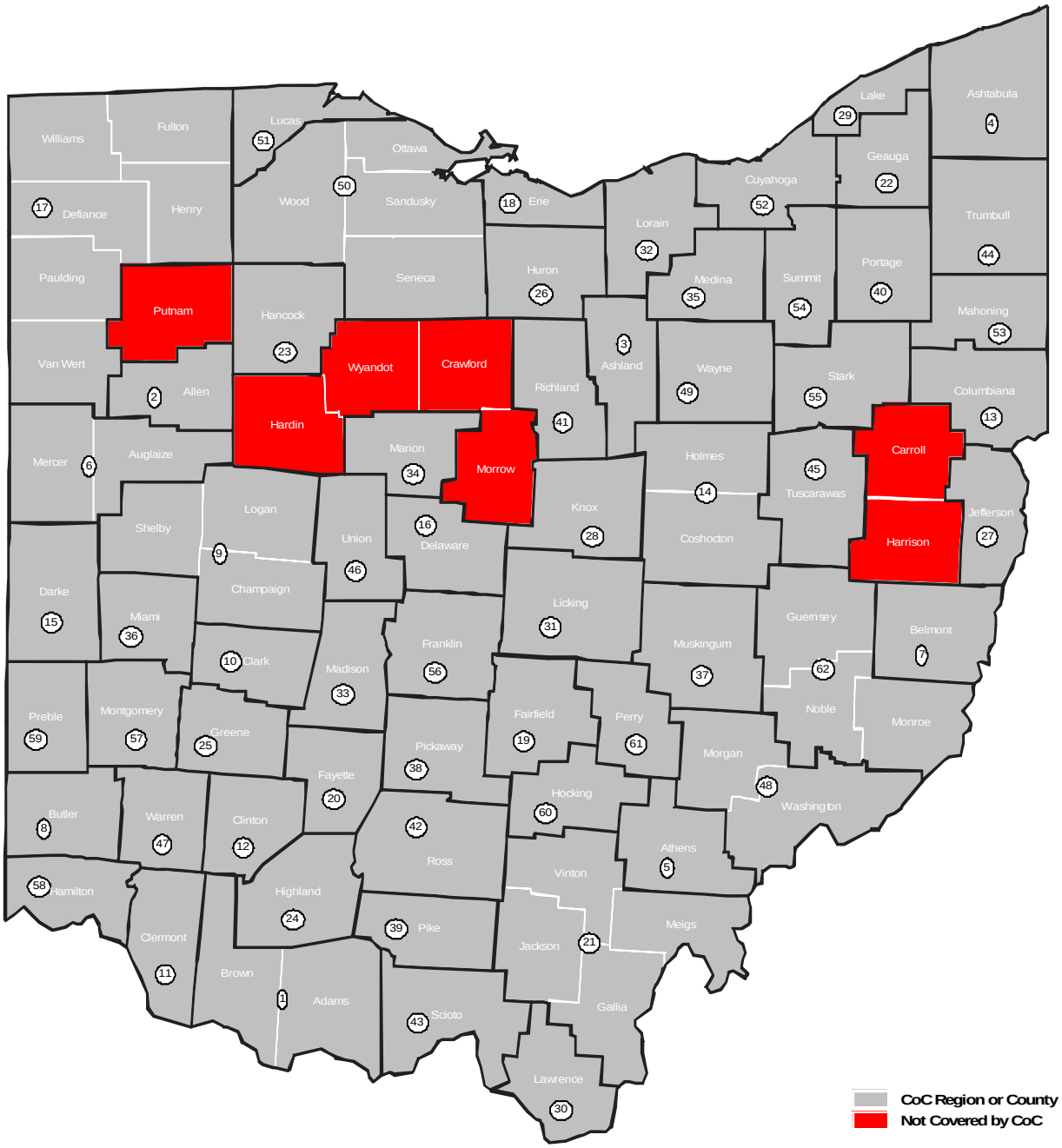
Statewide Coordination

Statewide homeless policies will be coordinated through the Balance of State Continuum of Care Advisory Committee. The Advisory Committee consists of representatives from state agencies, statewide coalitions and associations, and local homeless providers. The Advisory Committee also includes representation from the realty and banking communities. The Advisory Committee expects to meet three times during the upcoming year to identify gaps in the state's continuum of care and develop policies and strategies addressing those gaps. In addition, the Advisory Committee will participate in the planning and development of the state's 2012 Continuum of Care Homeless Assistance grant to HUD.

The Ohio Department of Development (ODOD) will continue to promote a coordinated statewide approach to homelessness. For instance, during the past four years, the Ohio Departments of Mental Health, Job and Family Services, Alcohol and Drug Addiction Services, Developmental Disabilities, Rehabilitation Services Commission and Aging have participated in the planning and review of some ODOD applications.

ODOD will require a continuum of care approach for applicants to the state's supportive housing programs. Map 9 on page 110 shows the areas of the state covered by a local continuum of care strategy.
A listing of the continuum of care objectives specific action steps is listed in on pages 112-113.

Map 9: Continuum of Care in Ohio



Prepared by the Office of Community Development,
Community Services Division,
Ohio Department of Development (December 2012)

Foster Care:

The Ohio Department of Job and Family Services require a life skills assessment to be completed on all youth in custody at the age of 16. They are then required to develop a life skills plan 30 days after the assessment is completed. The plan is to outline the strengths, limitations, and resources for the youth. This plan is to be reviewed every 90 days or until custody is terminated.

Youth that have emancipated from care can request services and support from a Public Children's Service Agency (PCSA). The PCSA is required to evaluate the strengths and needs of the young adult and then develop a plan. The plan should outline the responsibilities of the young adult and the PCSA. The PCSA may assist the young adult with room and board amongst other things. Most counties throughout the State of Ohio utilize an assessment provided by the Casey Life Skills for Youth Services. Casey Life Skills provide a supplement to the assessment that is devoted to homeless youth. This assessment particularly addresses the youth/young adult's current living situation, their health, employment and education.

Health Care:

Discussions are occurring in the area of a discharge plan policy for health care.

Mental Health:

Housing is a fundamental element of a community support program. Housing denotes a sense of permanence, a place where persons intend to reside. Providing shelter is a temporary option for homeless persons when a more stable residential option is absent. It is the policy of ODMH that homeless shelters are not appropriate living arrangements for persons with mental illness. Patients being discharged from ODMH Behavioral Health Organizations/Hospitals are not to be discharged to a shelter or to the street.

Community Support Network (CSN) programs are required to have emergency housing plans in place in the event their clients undergo unexpected residential change. This emergency housing plan must be approved by the relevant ODMH BHO Chief Executive Office, the contracting Board for the CSN program, and the BHO CSN Coordinator.

ODMH BHO and CSN programs, in conjunction with the responsible or contracting Board or agency, shall exhaust all reasonable efforts to locate suitable housing options for patients being discharged. Patients in ODMH BHOs shall not be discharged to homeless shelters and clients in an ODMH CSN program shall not be removed or relocated from community housing options to homeless shelters unless the responsible board or contract agency has been involved in the decision making process and it is the expressed wish of the affected person and other placement options have been offered to the affected person and refused. When a discharge or relocation to a homeless shelter occurs under these guidelines, the reasons shall be thoroughly documented in the person's chart and reviewed via the BHO's quality improvement process. Persons may not be discharged or relocated to homeless shelters for the convenience of staff, as a punitive measure, or for expediency. ODMH BHO policies shall be consistent with this directive.

Corrections:

It is the policy of the Ohio Department of Rehabilitation and Corrections (ODRC) to not discharge persons to the streets or to a shelter. ODRC provides a holistic and systematic approach to prepare an offender for a successful reentry into the community. This will begin at the offender's admission into the department, and continue until his or her final release from supervision. Reentry planning will address an offender's programming needs, linkages to the community and appropriate community supervision activities subsequent to release.

Within 90-120 days of release, case managers will assist offenders in determining potential housing options for release to the community. Potential housing options will be entered onto the offender's reentry plan.

Within 90 days of release, case managers will review with offenders the need for appropriate documentations. If required, the case manager will assist the offender in acquiring those documents needed for the purpose of identification and obtaining employment. Such documents may include, but are not limited to a Social Security replacement card, birth certificate, and Veteran's Discharge Status form. If applicable, appropriate community linkages will be made for offenders with substance abuse issues, mental health diagnoses and medical concerns. Currently, there are several pilot projects going on in the State of Ohio to increase an offender's ability to access Medicaid and social security more quickly and to be linked with mental health services and housing upon discharge.

Within 30 days of release, the case manager will finalize housing plans and the need for any other documentation for purposes of identification. The case manager will also discuss possible transportation plans and secure transportation if necessary. All plans for final release will be documented in the offender's reentry plan.

At approximately 180 days prior to release, offenders are offered release preparation classes that address areas such as job searching, resume writing, interviewing skills, job retention, community resources, goal setting and substance abuse, mental health and medical issues.

In addition to the above, through the passage of HB130 in December of 2008, the Ohio Ex-Offender Reentry Coalition was formed. The purpose of the Reentry Coalition is to ensure successful offender reentry, reduce recidivism and enhance public safety. More information regarding the Reentry Coalition, as well as, other offender reentry efforts can be found in the Ohio Ex-Offender Reentry Coalition's Five Year Strategic Plan for Fiscal Years 2010-2014 at http://www.reentrycoalition.ohio.gov/docs/Ohio%20Ex-Offender%20Reentry%20Coalition%205%20year%20Strategic%20Plan(4%2015%2009).pdf

The following are the CoC objectives, proposed actions steps and proposed achievements for FY 2012:

Objective 1: Create new Permanent Supportive housing beds for chronically homeless persons.

Action Steps:

1. Create 20 new Permanent Supportive housing beds for chronically homeless persons through new S+C projects;
2. Indentify 3 Balance of State CoC communities underserved by PH for chronically homeless persons, and begin creation of Permanent Supportive housing development plan for the CoC; and
3. Have 2 existing permanent supportive housing programs designate at least 10% of their beds for persons who are chronically homeless.

Numeric Achievement (beds/households): 91

Objective 2: Increase percentage of homeless persons staying in permanent supportive housing over 6 months to at least 71.5%.

Action Steps:

1. Increase the percentage of clients staying in Ashtabula CMHRSB S+C over 6 months to at least 50% through improved housing retention programming;
2. Increase the percentage of clients staying in Trumbull Lifelines S+C to at least 71.5% through improved housing retention programming; and
3. Provide at least 3 trainings attended by at least 50% of Balance of State Continuum of Care (BOSCOC) HUD-funded permanent supportive housing providers on best practices for housing retention.

Numeric Achievement (beds/households): 76

Objective 3: Increase percentage of homeless persons moving from Transitional Housing to Permanent Housing to at least 63.5%.

Action Steps:

1. Increase the percentage of clients moving from Ironton-Lawrence County Community Action Organization Transitional Housing program to Permanent Supportive Housing to at least 45%;
2. Increase the percentage of clients moving from Volunteers of America of Greater Ohio/Mansfield Transitional Housing program to Permanent Housing to at least 63.5%; and
3. Provide at least 3 trainings attended by at least 50% of Balance of State CoC HUD funded Transitional Housing providers on best practices for moving persons from Transitional Housing to Permanent Supportive Housing.

Numeric Achievement (beds/households): 76

Objective 4: Increase percentage of homeless persons employed at exit to at least 19%.

Action Steps:

1. Increase the percentage of clients employed at exit from Ironton-Lawrence Community Action Organization's Transitional Housing program to at least 16%;
2. Increase the percentage of clients employed at exit from Trumbull Lifelines/Joey's Landing Permanent Supportive Housing program to at least 16%; and
3. Provide at least 1 training on successful employment linkage/retention strategies to at least 50% of providers not currently meeting employment threshold.

Numeric Achievement (beds/households): 42

Objective 5: Decrease the number of homeless households with children.

Action Steps:

1. Implement 1 Rapid Re-Housing program for families with children;
2. Decrease homeless households with children by 3%; and
3. Provide at least 1 statewide training on best practices for serving homeless families with children.

Numeric Achievement (beds/households): 450

Guidance for Creating Regional Homeless Services Coordination Plans

In 2011 ODOD, as Balance of State Continuum of Care (BOSCOC) lead and administer of state homeless funds, began exploring the concept of regionalizing the state of Ohio for administration of its homeless services programs and began the process of collecting stakeholder feedback. The purpose of moving to a regional approach is two-fold; first, regionalization will streamline the communication and delivery of administrative services among the BOSCOC by organizing the 80 counties within the BOSCOC into less than 20 regions. Second, the Emergency Solutions Grant regulations released by HUD in late 2011 indicate HUD's desire for a systems-level approach to ending homelessness, including proposing that Continuums move to a coordinated intake system. The BOSCOC, made up of 80 counties, is too large to practically function under one coordinated intake system, requiring the creation of regional "hubs" to serve the same purpose. To the same end, each entitlement community will function as a standalone region for purposes of the ODOD's Homeless Crisis Response Program and Supportive Housing Program, which replace the Homeless Assistance Grant Program in program year 2012.

Each region will be responsible for creation of a Regional Homeless Services Coordination Plan (regional plan). The regional plan will set a framework for collaboration among providers of homeless and mainstream services, as well as for creating coordinated intake and assessment processes and referral systems. ODOD requirements for these plans will not be overly prescriptive, allowing flexibility for each region's local circumstances, but all plans must meet the requirements outlined in the Emergency Solutions Grant regulations as described below.

A small number of communities throughout the state are currently operating a centralized intake process/single point of entry system. In cases where these communities encompass an entire Homeless Planning Region (i.e. entitlement regions), the region is not required to develop a Regional Homeless Services Coordination Plan. However, the region will be required to explain how its centralized intake/single point of entry process meets the requirements set forth in the plan content section below.

Planning Process

Regional plans should be created collaboratively, in a meeting or series of meetings, among the regional homeless planning group. Regional leads should be prepared to describe the structure and process for development of regional plans at time of application for funds.

Participants
Groups will be convened by the state-appointed grantee and should include representation of the following, to the extent practicable:

- Each county and local continuum of care within the region;
- Shelters, tenant-based supportive housing, project-based transitional housing, and permanent supportive housing agencies within the region; and
- Service providers, both homeless and mainstream (i.e. ADAMH boards, local Job and Family Services, veterans' services agencies, school systems).

All emergency shelters seeking funding from ODOD through the Homeless Crisis Response Program *must* participate in the planning process and agree to the plan. (Domestic violence shelters are exempt from participation in coordinated intake activities, but should participate in the regional planning process.)

ODOD will offer individualized technical assistance throughout the planning process by request. Based on needs of the region, technical assistance could range from providing examples of forms and policies to meeting facilitation.

Plan Content

Each regional plan must include the following elements:

Inventory of Community Resources

Each region will create an inventory of resources and programs available locally. This includes, but is not limited to, emergency shelters, supportive housing, permanent supportive housing, rental subsidies, and supportive services such as employment programs, mental health and substance abuse counseling and entitlement programs. Inventories should include the name of the program, a brief description of its purpose, target population, summary of eligibility requirements, where services can be accessed and, if possible, an estimate of availability. Cataloging these details into a local inventory will strengthen the community's ability to make appropriate client referrals.

Coordinated Intake and Assessment System

Through use of a coordinated intake and assessment system, communities are better able to consistently assess the needs of individual clients and most effectively match them with the appropriate resources to meet those needs. For purposes of coordinated intake and assessment, service providers are divided into two categories: front door agencies, which include emergency shelters and other agencies administering homelessness prevention programs where persons can directly access homeless crisis response services; and non-front door agencies, which may include project-based transitional, tenant-based supportive and permanent supportive housing providers and other social service agencies where persons may first inquire about homeless services.

Though coordinated intake systems must be locally customized to meet each community's needs, all systems should include the following elements:

1. Common Screening Tool – A common screening tool is a set of very basic questions designed to aid non-front door agencies in making immediate, informed referrals to front door agencies for the purposes of a more detailed assessment. The screening tool should increase the likelihood that persons are being referred for assessment at the most appropriate location in order to decrease the burden placed on persons seeking service. Questions could include, "Do you have children with you?" and "In which county are you currently living?"

2. Common Assessment Tool - Creating a common assessment tool to be used by all front door homeless service providers to determine program eligibility. A common assessment tool ensures that clients are not required to undergo repeated or inconsistent intake processes at multiple locations as they move between different services. By all front door homeless services agencies within a community agreeing to a common intake assessment, a community lays the foundation for adopting a "no wrong door" policy, meaning homeless individuals and families are able to present at any front door homeless service provider within the region, regardless of the provider's available services, complete the common intake process, and then be referred to the appropriate agency for their needs. "No wrong door" policies can significantly reduce the burden placed on homeless individuals and families in identifying on their own which agencies offer appropriate services.

   Note: A common assessment tool does not require agencies serving targeted populations to provide services to clients outside of their normal scope. Once potential clients have completed the intake process, they should be referred to other programs for which they are eligible.

3. Referral Process – Regional plans must include a process by which homeless service agencies can refer clients among one another to optimize the clients' access to appropriate services. This process should be designed to provide timely and efficient response, matching the urgent nature of individuals experiencing a housing crisis. Such a process requires that each agency maintain communication and relationship with other agencies in the system, that they uphold the use of the common assessment tool, and agree to accept the integrity of that assessment when completed at other agencies within the system. The referral process should not be limited only to agencies providing homeless services, but should also include those agencies providing mainstream services and assistance.

4. Diversion Plan – Each time an individual or family applies for emergency shelter, an assessment should be completed before entry to determine the possibility of remaining in their current housing or in an alternative housing arrangement, such as staying with family

or friends, even if only temporarily, until a more stable housing solution can be secured. Diversion is not appropriate, however, in instances of domestic violence or where people are literally homeless and have no other safe options. Diversion plans must include how homelessness prevention funds will be used and targeted to persons from entering emergency shelter.

Note: Shelter diversion is not equal to denying shelter entry. Each client should be assessed for diversion options, but where no safe and realistic alternative exists, emergency shelter should be made available.

5. Other Considerations – Regional plans should also include policies or summaries of policies regarding maximum length of stay, discharge protocol, safety measures for serving special needs populations, and targeting and methodologies for street outreach. In the event that individual agencies choose to maintain differing policies on these issues, the policies of all agencies should be recorded and distributed among the regional partners to better inform the intake assessment and the referral process.

6. Prevention and Re-housing – As a region, all partner agencies providing homelessness prevention and re-housing assistance must develop a consistent set of standards for implementation across the region. These standards must address: policies determining what percentage of rent, if any, clients receiving assistance must contribute, and how that amount will be adjusted over time; maximum dollar amounts or months of assistance available to each client; maximum amount of relocation assistance; and policies for determining and prioritizing which eligible individuals and families will receive re-housing assistance.

Creation of a regional plan is an application requirement for the Homeless Crisis Response Program, which replaces the Homeless Assistance Grant Program for program year 2012. These plans must be completed by the September 5, 2012 application deadline. Regions should be prepared to implement plans by the Homeless Crisis Response Program grant period start date of January 1, 2013. ODOD will provide additional guidance and technical assistance throughout this time. To request individualized assistance in the development of a plan, regional leads should contact Jacqui Buschor at 614-466-0201 or jacqui.buschor@development.ohio.gov.

Other Actions Planned for 2012

1. Actions To Foster And Maintain Affordable Housing

The state of Ohio will work with other state and local agencies to address the prevention of foreclosures and to address the blighting influences of vacant and abandoned properties on neighborhoods. For example, funding through the Community Housing Improvement Program (HOME and CDBG) will be combined with Neighborhood Stabilization Grants funds to target areas identified to be of greatest need around the state of Ohio to address foreclosed, abandoned, and blighted homes within these neighborhoods. The state of Ohio will also continue to address foreclosures through the "Save the Dream" initiative. This initiative utilizes a hotline to connect homeowners in danger of foreclosure with counselors, legal services, and rescue funds, as a means of helping them to avoid foreclosure.

2. Coordination With Low Income Housing Tax Credits

The state of Ohio is expected to distribute about $24 million in Housing Credits in 2012, also known as Low-Income Housing Tax Credits (LIHTC), which are allocated to both for-profit and non-profit owners by the Ohio Housing Finance Agency (OHFA). LIHTC projects typically target populations with incomes and rents below 60% of area median income, so additional financing subsidies are often needed. The Housing Development Assistance Program (HDAP) contains a separate set-aside, which offers funding solely in conjunction with the state's Housing Credit Program. This provides a more streamlined funding mechanism, so that tax credits and gap funds can be awarded through a single application process. To further expedite the review of requests for funding and to assure that no project receives more subsidy than necessary, OHFA has established an application, which is used to apply for housing credits, affordable housing loans and HDAP.

3. Actions To Address Underserved Needs

The state of Ohio will continue to undertake a number of actions during FY 2012 to meet underserved needs in the state. To ensure that statewide programs are responsive to local needs, ODOD will continue to support the creation of homeless advisory groups made up of representatives from nonprofit homeless organizations and advocacy groups from across the state. These advisory groups provide a forum for assessing the design and implementation of ODOD programs. These groups are also instrumental in identifying underserved areas in the state.

Many areas of the state lack sufficient capacity to provide a continuum of care approach to homelessness in their community. The state of Ohio will continue to work with the Coalition on Homelessness and Housing in Ohio (COHHIO) to develop that capacity. Specifically, local non-profits and communities will be provided technical assistance for the development of a local continuum of care approach to homelessness. This includes assistance in assessing local needs and improving local coordination.

ODOD will also provide technical assistance to local non-profits to increase the range of services available in underserved areas of the state. This will consist of helping nonprofit agencies develop programs that will provide services to underserved areas of the state. In addition, ODOD will continue to evaluate and fund projects based partly on the extent to which there are unmet needs in the local community.

4. Actions To Reduce Negative Effects Of Public Policies On Housing

As HUD itself noted in the March 13, 2006 regulations revising the Consolidated Plan requirements, states have less control over barrier removal than do entitlement jurisdictions and cited comments by a group representing state community development agencies that it was difficult for states to meet goals for affordable housing barrier removal because states have very minimal control over the major barriers identified by HUD (zoning, local fees, etc). Zoning and land use decision-making are an inherently local process, subject to a range of influences including market forces and citizen input.

This is certainly true in Ohio, which has a long tradition of local "home-rule" self-governance. In recognition of this reality, OCD instead has required each of its local Formula Allocation grantees

(which cover the entire non-entitlement area of the state) to conduct a local Analysis of Impediments and devise a strategy and a schedule to address them. These analyses are required to include an assessment of local regulations and policies that may create barriers to creating or accessing affordable housing. OCD requires communities to submit their Impediments Analysis for review. During this year and subsequent years, communities will be offered assistance to rectify any deficiencies that OCD staff identified in these local Analyses of Impediments.

5. Actions To Reduce Lead-Based Paint Hazards

OCD is proposing the following activities to address lead-based paint hazards during FY 2012-2012:

1. In FY 2012 OCD and ODOD will require grantees to follow the Lead-Based Paint Guidelines on page 119.

2. OCD has developed a Chapter within its Housing Standards, the Residential Rehabilitation Standards (RRS) that addresses lead-based paint. OCD will require all grantees undertaking housing rehabilitation activities to meet these standards.

3. OCD will continue to provide funding for locally administered housing rehabilitation programs, which are expected to rehabilitate about 450 owner units and 75 renter units with FY 2012 funding. Housing units that undergo rehabilitation are required to be made lead-safe.

4. OCD will provide training and technical assistance for local program staff and local lead hazard mitigation personnel, which will include the following activities:

   - Make the Remodeler's and Renovator's Training Program available to contractors and workers throughout the state, and especially in areas served by the Community Housing Improvement Program. OCD will continue to use Training and Technical Assistance funds to keep the cost of training sessions affordable to housing rehabilitation contractors.

   - Provide affordable training for Lead Risk Assessors and Lead Clearance Technicians, as needed, especially for persons who are implementing local CHIP grant activities.

   - Provide on-site technical assistance to local CHIP grantees through a third party contractor/trainer.

   - OCD will provide other forms of training and technical assistance support to local programs and hazard control personnel. This may include further specialized training sessions for housing program administrators, as well as preparing and distributing training materials. OCD will continue to maintain current reference information on its website at http://development.ohio.gov/Community/ohcp/Lead-BasedPaintIssues.htm

5. OCD will explore other sources of funding that could assist local communities, non-profit organizations or contractors to address lead-based paint hazards. This will include coordinating efforts with the Ohio Department of Health to identify sources of funding that can assist low- and moderate-income households in paying for the cost of lead hazard mitigation, especially in housing units where a lead hazard control order has been issued by the Ohio Department of Health. This may include submission of an application for a HUD Lead Hazard Control Grant.

6. Maintain lines of communication with federal, state and local agencies and organizations involved with the lead-based paint issues and activities, including:

   - Distribute information directly to grantees, organizations, local health departments and other organizations, as necessary.

- Attend meetings and trainings with organizations, grantees, etc. as needed to disseminate information, discuss issues and obtain information on lead-based paint issues.

- Staff of the Ohio Department of Development (ODOD), Ohio Department of Health (ODH) and the Environmental Protection Agency (EPA) will continue to coordinate and communicate their policies and activities, and will work closely with HUD and staff of other federal agencies to keep up to date on regulatory requirements and issues. OCD/ODOD staff will attend the Lead Advisory Council meetings and participate in the Environmental Primary Prevention Workgroup.

OCD has begun reporting the total number of units that have been made lead-safe as part of the performance measurement system, and will begin a registry of lead-safe units (units treated with interim controls or abated, and successfully clearance tested).

Ohio Department of Development (ODOD)
Lead-Based Paint Guidelines
January 2012

The following guidance is provided to assist housing projects or programs using federal or state funds provided through the Ohio Department of Development (ODOD).

1. Regardless of any information provided in these guidelines, all existing federal, state or local laws, regulations and procedures concerning lead-based paint must be followed. Awareness and adherence to these regulations is the responsibility of the agency performing or contracting for housing rehabilitation activities. Procedures for distribution of information on the hazards of lead-based paint, including appropriate disclosure notices, must be integrated into any and all housing-related activities.

2. Local communities must develop local strategies for addressing lead-based paint in housing as part of their Consolidated Plan or, for non-HUD Entitlement communities, as part of their Community Housing Improvement Strategy (CHIS). This strategy will need to include policy on units containing children with Elevated Blood Lead levels, which, pursuant to the provisions of H.B. 248, requires lead hazard controls to be applied by licensed lead abatement contractors.

3. Except where all lead-based paint is removed, if lead hazard mitigation activities are performed on renter-occupied units which are financed with HUD funds or other funds covered by these policy guidelines, the owner of the units must incorporate a schedule of lead-based paint maintenance activities into regular building operations consistent with 24 CFR Part 35.935.

4. If state funding is used to directly assist housing projects or activities constructed prior to 1978, both state regulatory requirements and 24 CFR Part 35 must be followed. (Direct state assistance excludes state bond financing, state or federal tax-credits, and pre-development assistance, unless federal assistance is also involved.)

5. Agencies involved in lead-based paint hazard mitigation are encouraged to coordinate efforts with local governments, state and local health departments, Community Action Agencies, other non-profit organizations, local housing authorities, and private sector organizations wherever possible.

Table 9: Estimated Units Affected by Lead Based Paint in Ohio

1	2	3	4	5	6	7	8	9	10	11
Year Constructed	Tenure	Total Occupied Units	Percent Units With Lead Paint	Number Occupied Units With Lead Paint	Percent Occupied Units With With Lead Hazard**	Number Occupied Units With With Lead Hazard	Percent Units With Hazard Occupied By LMI Households	Number Units With Hazard Occupied By LMI Households	Percent LMI Units With Hazard With Children Under 6	Number LMI Units With Hazard With Children Under 6
Before 1940	Owner	694,906	90.0%	625,415	44.0%	275,183	37.4%	102,819	17.8%	18,302
	Renter	339,530	90.0%	305,577	44.0%	134,454	66.5%	89,474	17.8%	15,926
1940 - 59	Owner	824,749	80.0%	659,799	18.0%	118,764	35.1%	41,674	17.8%	7,418
	Renter	286,391	80.0%	229,113	18.0%	41,240	64.4%	26,543	17.8%	4,725
1960 - 79	Owner	935,325	62.0%	579,902	9.5%	55,091	25.0%	13,796	22.2%	3,063
	Renter*	468,230	62.0%	290,303	9.5%	27,579	67.2%	18,543	22.2%	4,117
Total Owner =		2,454,980		1,865,116		449,037		158,288		28,782
Total Renter =		1,094,151		824,992		203,273		134,560		24,768
Total =		3,549,131		2,690,109		652,310		292,848		53,550
Percent of Total =		100.0%		75.8%		18.4%		8.3%		1.5%

*49,534 in Public Housing Units deleted from figure as lead hazards in these units have been addressed by HUD via local housing authorities.

**Percent lead hazards 1960-79 units estimated, based on percent units with interior lead paint compared to 1940-59 (per HUD National Lead Paint Survey, 1991) .

and applying this ratio (44%) to 1940-59 percentage (44% * 18%= 9.5%); other percentages from HUD Economic Analysis of HUD Rule on Lead Base Paint Hazards.

Sources: Columns 1-3: U.S. Census; Column 4: HUD 1990 National Survey on Lead-Based Paint; Columns 6: Eliminating Childhood Lead Poisoning, President's Task Force on Environmental Health Risks and Safety Risks to Children, 2000; Column 8: Oho Department of Development Office of Policy Research and Strategic Planning;

Column 10; Eliminating Childhood Lead Poisoning, President's Task Force on Environmental Health Risks and Safety Risks to Children, 2000. 6/7/2000

6. Activities To Strengthen And Improve the Institutional Structure / Training & Technical Assistance

Below is a listing of the training sessions that OCD plans to provide during FY 2012. Other training and technical assistance initiatives will likely be offered in addition to those listed here, but these are the areas that OCD will focus on during the upcoming year.

1. Program Application and Implementation Trainings. These will be set up by each program manager during the year as appropriate. Programs will include:

   - CHIP
   - Economic Stimulus Program (if authorized by the federal government)
   - Comprehensive Downtown Revitalization Program
   - Water and Sanitary Sewer Program
   - Community Development Program
   - Neighborhood Revitalization Grants
   - Microenterprise Business Development Grants.

2. Training in support of Lead-Based Paint Hazard Control:

   - Lead-Safe Renovation (Renovator's and Remodeler's Training Program)
   - Lead Inspector/Risk Assessor Training
   - Lead Inspector/Risk Assessor Training Refresher
   - Lead Supervisor/ Contractor Training
   - Lead Supervisor/Contractor Training Refresher
   - On-site Technical Assistance
   - EPA Renovation and Remodeling Refresher 4-hour update training for those who have previously attended *"Lead Safe Renovation Training."* Successful completion of this training qualifies as certification in the EPA RRP training which will be required for all contractors by May 2010.)

3. OCD will investigate various sources of fair housing/fair lending information available on the Internet and disseminate information to grantees.

4. OCD will partner with agencies to provide training on access to lending issues.

5. OCD will continue to provide funds to statewide and regional nonprofits to act as intermediaries that can help groups through program design, provide direct technical assistance and help with fund raising strategies. It is anticipated that the following groups will apply for the funds:

   - Ohio Community Development Corporation's Association
   - Coalition on Homelessness and Housing in Ohio
   - Corporation for Ohio Appalachian Development
   - Heritage Ohio, Inc.
   - Ohio Conference on Community Development

6. OCD will continue to offer training and technical assistance by providing funding to intermediary organizations to conduct training and technical assistance activities. Support of training and technical assistance may include the following subjects:

   - Building basic and intermediate skills of non-profit organization staff in designing and developing projects.
   - Training and technical assistance for local microenterprise programs.

- Training on establishing and operating Individual Development Accounts (IDAs).
- Training for the development and implementation of Community Economic Development (CED) strategies.
- Training to develop Welfare to Work initiatives.
- Training and technical assistance for downtown development programs.
- Training and technical assistance for supportive housing programs.
- Training and technical assistance on housing development in the Appalachian area of the state of Ohio.
- Training to develop capacity to implement housing development projects.
- Continue to provide training on the National Main Street approach for extended technical assistance to the Ohio Main Street Communities.
- Continue to provide technical assistance to grantees and applicants for the OCD Comprehensive Downtown Revitalization Program through Downtown Assessment Team (DART) visits and community visits as requested.
- Heritage Ohio will conduct workshops and an Annual Conference.
- COHHIO will continue to assist with the implementation and evaluation of the Homelessness Prevention and Rapid Re-Housing Program.
- COHHIO will conduct workshops and trainings to increase the administrative capacity of agencies that provide assistance to the homeless and near homeless.

7. OCD will develop a Basic Housing Program Income Handbook and provide statewide training on new Program Income regulations.

8. OCD will continue to develop its Internet site to include reference and resource material related to program implementation and management.

9. OCD will conduct environmental review training.

10. OCD will develop a revised training for persons who are new to implementing CDBG, HOME, and supportive housing programs.

11. OCD will distribute the Residential Rehabilitation Handbook and provide training.

12. OCD will conduct training on technical issues related to construction, national objectives, procurement, construction management, planning and innovative project designs.

13. OCD will continue to work with Ohio Conference of Community Development, Inc. to provide training recommended by its membership, including CDBG and HOME Certification courses.

7. Actions To Reduce The Number Of Families That Are Below The Poverty Level

Ohio Works First

In Ohio and throughout the nation, the effort to reform the welfare system was undoubtedly the most significant action taken in many years to attempt to break the cycle of poverty. In Ohio, welfare reform, known as Ohio Works First (OWF), was initiated in 1997 by H.B. 408. The financial-assistance portion of the state's Temporary Assistance to Needy Families (TANF) program, OWF provides cash benefits to needy families for up to 36 months. OWF requires at least 50 percent of adults receiving benefits to work or engage in work-related activities, such as educational or training programs. For more information about this program, go to http://jfs.ohio.gov/owf/.

About the same time it initiated welfare reform, Congress also passed the Workforce Investment Act, to reform federal job training programs and create a new, comprehensive workforce investment system. The

reformed system is intended to be customer-focused, to help Americans access the tools they need to manage their careers through information and high quality services, and to help U.S. companies find skilled workers.

As a result, Ohio convened a State WIA Implementation Team. The State WIA Implementation Team included representatives from the Department of Education, Department of Aging, Department of Development, Department of Human Services (now the Ohio Department of Job and Family Services), Ohio Board of Regents and the Ohio Rehabilitation Services Commission. Some of the roles of the state team included:

- Making recommendations for the design of the new workforce development system;
- Staffing specific initiatives of the State Workforce Investment Board;
- Facilitating technical assistance to local employment systems; and
- Research and information gathering.

The State WIA Implementation Team also developed several work groups to address a variety of specific issues. ODOD staff assist with several of these workgroups: Performance Measurement, Service Delivery, Local Area Designations and State Workforce Investment Board Structure. For more information about Ohio's implementation of WIA, go to http://jfs.ohio.gov/owd/wia/index.stm.

As a result of WIA, the Ohio Department of Job and Family Services (ODJFS) receives federal funds to administer several federal workforce programs, which it does by overseeing a network of 30 full-service "One-Stop Centers" across the state. One-Stop Centers provide free job training and other employment services to Ohioans looking for work. They match job seekers with businesses looking to hire workers, and help laid-off workers learn new skills and find new jobs. Unemployed workers can go to their local One-Stop to find out if they might be eligible for training assistance, Trade Adjustment Assistance, adult education services, veterans' services or apprenticeship opportunities.

Since October 2008, through a partnership with leading edge private sector resources, Ohio job seekers can go to OhioMeansJobs.com for free access to more than 100,000 job openings, including full-time, part-time, contract, internship and temporary work. They can use Ohio Means Jobs to learn about upcoming recruitment events, and search for jobs by a variety of filters, including company names, occupational titles, location and salary requirements. This innovative tool has been extremely successful in helping unemployed Ohioans regain their financial self-sufficiency.

The Prevention, Retention, and Contingency (PRC) program, part of Ohio's TANF program, has been an integral part of the state's efforts to reduce poverty. Prevention services are designed to divert families from ongoing cash assistance by helping them through times of crisis. Retention services allow employed TANF recipients to maintain employment. Contingency services help families meet emergent needs which, if not met, threaten the safety, health or well-being of one or more family members. PRC benefits are available at county departments of job and family services and vary from county to county based on local needs. For more information, go to http://jfs.ohio.gov/factsheets/PRC.pdf.

Programs and Activities That Directly Support Job Training and Development

Apart from restructuring the human services and workforce development framework, assistance will be provided to local communities through the following programs to directly support local job training, job creation and business development.

1. The Community Services Block Grant Program, offered through the Office of Community Services (OCS). OCS, which has a goal of removing obstacles and solve problems that block the achievements of self-sufficiency for low-income persons, will distribute $ 27 million in federal funds to 52 certified community action agency providers. Activities will be locally determined based on needs assessments.

Services will be quantified within 10 work plans: Employment, Education, Income Management, Housing, Emergency Services, Nutrition, Linkages with Other Programs, Self-Sufficiency, and Other.

2. The Office of Housing and Community Partnership's Economic Development and Microenterprise Business Development Programs, which provide loan, grant and technical assistance to communities to create jobs which principally benefit low- and moderate- income persons (refer to the method of distribution section for a complete description of the resources that will be committed through these two programs).

3. ODOD created the Workforce and Talent Division and transferred staff from ODJFS. The Workforce and Talent Division administers the Ohio Investment in Training Program (OITP) which assists manufacturing and manufacturing-related industries by financially supporting employee training. OITP provides grants of up to 50% of allowable training costs to an individual company.

4. The Office of Business Development administers financing programs to provide direct loans and bonds for businesses locating or expanding in Ohio that demonstrate that they will create or retain jobs in Ohio.

5. The Office of Business Development administers the Business Development (412) Account, the Roadwork Development (629) Account and the Urban and Rural Initiative Grant Program (442). In addition, the Office administers the Ohio Steel Industry Advisory Council, the Ohio Agri-Industry Council and Ohio's Site Selection System.

6. The Office of Business Development administers the Ohio Job Creation Tax Credit, the Manufacturing Machinery and Equipment Investment Tax Credit and the Brownfield Site Clean-up Tax Credit. The Office also administers and assists local implementation of Ohio's property tax incentive programs which include: the Enterprise Zone Program, the Voluntary Action Program, Community Reinvestment Areas, and Tax Increment Financing.

8. Affirmative Marketing and Fair Housing Activities

1. OCD will continue to support the development of a strong fair housing network through meetings and coordination of effort with all the organizations, groups and agencies, including lenders, Realtors, local fair housing administrators, state agencies and others.

2. OCD will continue to provide direct funding to support local fair housing programs through the Community Development, Community Housing Improvement, and the New Horizons Programs.

3. OCD will prioritize the review of shelter and supportive housing program marketing and fair housing compliance.

4. Local governments' fair housing responsibilities are described under the heading of Local Government Certifications to the State.

5. OCD will provide additional emphasis on fair housing compliance related to the Community Development Program and CHIP.

6. OCD will provide training to fair housing and housing providers on fair housing issues and specifically issues related to implementing the state's standard fair housing program. One-on-one assistance will also be provided throughout the year.

7. OCD will continue to promote the consolidation of fair housing efforts and resources through the establishments of consortia of local government. OCD will continue to receive and review Affirmative Marketing Plans for housing developed with five or more units. Assistance will be given to nonprofits and agencies in constructing and implementing appropriate actions. An Affirmative Marketing Handbook and Ohio Fair Housing Guide will continue to be disseminated.

8. OCD will continue to provide a separate dedicated funding source (i.e., the New Horizons Program) for applicants who desire to implement fair housing initiatives beyond the scope of the state's standard fair housing program requirements. OCD will continue to encourage communities to pool their financial and human resources in fair housing by developing a consortium of communities.

9. OCD will continue to network through meetings, Internet, newsletters, and coordination with other fair housing agency and advocates.

10. OHFA will conduct training and educational outreach to housing providers and developers on issues related to fair housing.

11. OCD will coordinate with organizations that assist persons with disabilities (i.e. independent living centers) to identify the location of CDBG, HOME, and OHTF assisted units which are accessible.

12. OCD will coordinate with the Foreclosure Task Force to provide education on unfair, and deceptive, lending practices.

13. OCD will provide fair housing training specifically for the Community Development Program and CHIP.

14. OCD will assist the Ohio Civil Rights Commission in holding forums on civil rights issues throughout the state.

15. OCD will hold round table discussion groups on fair housing and community development.

9. Addressing the Needs of Public Housing

The State of Ohio nor any of its agencies are designated as a public housing authority nor do they administer public housing units. These functions are performed by local public housing authorities within the state. Insofar as the state can determine and as indicated on HUD's website, there are no troubled housing authorities in the state of Ohio at the present time. The continued reductions in HUD funding to the state make it increasingly difficult for the state to continue to implement programs that assist local communities and persons, notwithstanding providing assistance to troubled public housing authorities. The state does not administer public housing units or oversee housing authorities, but as the civil rights compliance regulations are the same as the OCD housing program regulations, OCD is able to provide direct technical assistance to these agencies upon request. It is not clear what resources the state could provide to assist a troubled public housing authority, especially prior to an agency being designated as such. Certainly, should a PHA be designated as "troubled", the state would attempt to provide support to the agency, most likely using available funds from the 2% technical assistance CDBG funds to provide third party, perhaps a peer-to-peer, mentoring or technical assistance.

10. Coordination With Other Agencies And Organizations

The programs and activities that will be carried out by OCD staff over the next year will involve coordination with a number of agencies and organizations, many of which are identified on Table 10 on the following two pages, along with a description of the type of coordination that will take place.

Table 10: Planned Interagency Coordination for FY 2012

Organization/Agency	Coordination
Heritage Ohio, Inc. (HOI)	OHCP staff will attend the HOI meetings in order to exchange information to help facilitate the implementation of OHCP's Comprehensive Downtown Revitalization Program. HOI is a recipient of a Training and Technical Assistance grant, and works with OHCP to provide assistance to small communities interested in downtown revitalization activities.
Balance of State Continuum of Care Committee	Statewide homeless policies and services will be coordinated through the committee. The committee will assist in the preparation of the Ohio Balanace of State Continuum of Care application to the U.S. Department of Housing and Urban Development.
Ohio Department of Mental Health (ODMH)	Representatives from the Ohio Department of Mental Health will participate in the planning and review of the Homeless Assistance Grant Program and balance of state Continuum of Care applications. Representative also advise OHFA on provision of rental housing and necessary services for its population.
Federal Emergency Management Agency (FEMA) and State Mitigation Committee	OHCP will be involved in the efforts of FEMA and the State Mitigation Committee to allocate funds to Ohio counties experiencing disaster-related events.
Small Communities Environmental Infrastructure Group (SCEIG)	OHCP representatives will discuss the financing of water and sewer projects with local and state entities. SCEIG established the Water and Wastewater Technology Committee, which will research water and wastewater treatment technologies.
National Association of Human Rights Workers (NAHRW) and Ohio Association of Human Rights Workers	OHCP will work with these associations to encourage the collection and dissemination of ideas, information and research among organizations and individuals involved in civil and human rights issues.
Minority Business Task Force	OHCP will consult with the state task force and other state and local agencies to discuss Section 3 regulations and the utilization of MBE/WBE contractors.
Ohio Association of Community Action Agencies (OACAA)	OHCP will continue to work with OACAA and its member agencies, especially by drawing upon the expertise and knowledge of CAA staff to administer an implement programs funded through OHCP.
Ohio Access	OHCP will continue to work with the Ohio Access Task Force to implement its vision statement of developing state agencies policies to promote Ohio's seniors and people with disabilities live with dignity in settings they prefer, maximize their employment, self-care, interpersonal relationships and community participation, and government programs that honor and support the role of families and friends who provide care.
Ohio Conference of Community Development (OCCD)	OHCP and OCCD co-sponsor conferences to benefit all Ohio communities. OCCD's State Program Committee reviews OHCP programs and policies, and the State Program Training Committee coordinates training issues and activities with OHCP.
Ohio Department of Health (ODH)	OHCP will coordinate its lead-based paint activities with staff of the Ohio Department of Health, which will include training, housing, and policy development. OHCP will also coordinate with ODH on the development and implementation of a statewide Healthy Home/Housing plan.

Table 10: Planned Interagency Coordination for FY 2012 (continued from previous page)

Organization/Agency	Coordination
Community Development Finance Fund (CDFF)	OHCP will coordinate efforts with the CDFF to provide both pre-development and project financing to non-profit organizations.
Ohio CDC Association	OHCP will coordinate efforts with the CDC Association on the microenterprise program, non-profit housing and other related activities. OHFA works with the CDC Association on operating support for CHDOs and awards of funding through HDAP.
Coalition on Homelessness and Housing in Ohio (COHHIO)	OHCP staff will coordinate efforts with COHHIO relative to training, programs and activities relative to homelessness and housing. COHHIO will participate in preparation of state's Continuum of Care application. A representative of COHHIO also serves on the OHFA housing credit advisory committee.
Interagency Acquisition and Relocation Task Force	OHCP staff will serve on this task force to address uniformity issues related to acquisition and relocation procedures and policies.
Ohio Civil Rights Commission (OCRC)	OHCP's fair housing coordinator will work with staff of the Ohio Civil Rights Commission to address issues of mutual concern relative to civil rights and fair housing.
Ohio Historic Preservation Office (OHPO)	OHCP staff will coordinate with OHPO staff in addressing historic preservation issues that arise relative to housing, economic and community development projects, as well as providing training on preservation issues and procedures.
Homeless Management Information System (HMIS)	OHCP will work with providers and COHHIO on the effective implementation of the balance of state's HMIS. The major focus will be on increasing the data quality of participants and development of a better reporting capacity.
Ohio Department of Alcohol and Drug Addiction Services (ODADAS)	OHCP staff will coordinate with ODADAS to market and provide technical assistance to any OHCP/ODADAS affiliated organization interested in applying for OHTF Housing Assistance Grant Program funds.
Ohio Captital Corporation for Housing (OCCH)	OHCP staff will coordinate with OCCH to market and provide a series of housing development trainings throughout the state. OHFA works with OCCH in connection with the development of the housing credit program.
Corporation for Ohio Appalachian Development (COAD)	OHCP will coordinate with COAD to provide training on lead-safe housing rehabilitation procedures to reduce lead hazards existing in low-moderate income housing stock.
Interagency Council on Homelessness and Affordable Housing (ICHAH)	OHCP will coordinate with the Interagency Council on Homelessness and Affordable Housing to develop appropriate housing strategies for homeless persons and families.
ACTION Ohio	OHCP staff serves on the board of this statewide coalition against domestic violence, advocating for victims, survivors and their families
Ohio Statewide Independent Living Council (SILC)	OHCP staff will work with SILC to promote equal access and full inclusion and integration of individuals with disabilities into the mainstream society.

Performance Measures

In 2003 HUD issued a notice on Performance Measures, strongly encouraging grantees to develop and use a state or local performance measurement system. Though a great deal of "ouput" measurement data (number of units, linear feet, etc.) is reported to HUD annually, HUD is looking for "outcome" data that shows how HUD programs impact communities and the lives of people and families. OCD and OHFA developed a performance measurement system as part of the FY 2010 - 2014 Consolidated Plan Strategy. The system first involved establishing a set of objectives for each area (housing, community development and economic development) that would demonstrate outcomes (i.e., impacts). Then, one or more performance measures were established for each objective that would indicate the extent to which the objective was achieved. The objectives and performance measures will be stated each year in the Action Plan for that year, while the numerical outcomes (impacts) will appear in the Annual Performance Report. The performance measures for FY 2012 are located on pages 130-139.

Housing Performance Measures

Activities: **CHIP**
Community Development Program
Water and Sanitary Sewer Program (Service lines and tap-ins)

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

Primary Objectives (Outputs) and Secondary Objectives (Outcomes):

Housing Preservation and Accessibility

Objective 1: Preserve affordable owner and renter housing for lower-income households by bringing the housing unit up to program standards and codes, eliminating hazards and deficiencies in major systems, and reducing maintenance cost.

Measure 1: Owner / Renter units brought to standard

Objective 2: Eliminate lead-based paint hazards through the application of interim control measures based on a risk assessment followed by a clearance examination.

Measure 1: Number of units where lead hazards have been mitigated and passed clearance.

Objective 3: Improve affordability by reducing housing cost to lower income housing through energy efficiency improvements.

Measure 1: Number of units made more energy efficient.

Objective 4: Make modifications to dwelling units occupied by persons with disabilities or special needs to improve accessiblility.

Measure 1: Number of units that have been modified to improve accessibility for special needs persons.

Creating New Affordable Housing Opportunities

Objective 5: Expand housing opportunities for LMI households, by providing assistance that will enable them to acquire affordable housing that meets program and local standards.

Measure 1: Number of new affordable housing units added to the housing stock.
Measure 2: Number of families provided assistance to enable them to become first-time homeowners through acquisition of an existing affordable and appropriate housing unit.
Measure 3: Number of persons or families provided with rental assistance to enable them to acquire or maintain affordable, safe and sanitary housing.
Measure 4: Households assisted with acquiring housing to relieve an overcrowded housing situation (1.01 persons per room or more).
Measure 5: Number of affordability/unit years created.
Measure 6: Households that could not be assisted due to poor credit or other problems.

Homelessness Prevention

Objective 6: Prevent homelessness and address immediate threats to health and safety caused by emergency housing issues, such as roof leaks, or failure of water/sewer systems, heating systems, and electrical systems, or temporary housing assistance payments.

Measure 1: Number of LMI households assisted with emergency repairs to basic housing systems to maintain occupancy and habitability.
Measure 2: Households provided with temporary housing payments to prevent homelessness.

Neighborhood Revitalization

Objective 7: Employ housing resources as part of an overall neighborhood revitalization strategy to address locally-designated neighborhood revitalization areas that have multiple housing and community development needs and a high concentration of lower income populations.

Measure 1: Number of housing units rehabilitated as part of a neighborhood revitalization strategy.
Measure 2: Number of in-fill housing units constructed as part of an overall neighborhood revitalization strategy.

Supportive Housing Counseling Activities

Objective 8: Provide supportive housing counseling services to assist lower-income households with acquiring or maintaining housing.

Measure 1: Persons or families provided with housing counseling services to help them acquire housing or maintain their current housing.

Strategies:

Strategy 1: Commit CDBG and HOME funds annually to the support the Community Housing Improvement Program (CHIP) to provide housing assistance to local communities with an approved housing plan to address locally-identified housing and community development needs.

Strategy 2: Enable Community Development programs to utilize CDBG funding for housing, housing-related and supportive housing activities**.**

Housing Performance Measures

Activities: Housing Development Assistance Program (HDAP)

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

Primary Objectives (Outputs):

Objective 1: Expand affordable rental housing opportunities for lower-income persons and families in Ohio by using HOME funds to provide gap financing in conjunction with other funding sources, including Ohio Housing Credits, to fund approximately 30 projects and create about 1,200 units of affordable rental housing units annually.

Measure 1: Number of new affordable housing (units) created for lower-income households as a result of HOME participation (affordable housing means units in projects that meet the HOME Program affordability and occupancy requirements).

Secondary Objectives (Outcomes):

Housing Credit Gap Financing

Objective 2: Create long-term affordable housing opportunities for residents of rental housing.

Measure: Number of years of affordability in rental projects based on the investment of HOME dollars.

Objective 3: Expand rental opportunities for very low-income households by targeting families earning at or below 35% AMGI.

Measure: Number of units occupied by households with incomes of 35% AMGI or less.

Objective 4: Establish linkages between projects and local supportive services agencies.

Measure: Number of projects/units that provide service coordination.

Objective 5: Reduce housing costs for lower-income families by encouraging energy-efficient units that also provide universal design features.

Measure: Number of affordable projects/units that incorporate both energy-efficient measures for heating, cooling, appliances, and lighting as well as a variety of universal design features that are projected to reduce housing cost by an average of 10%

Housing Development Gap Financing

Objective 4: Encourage the development of housing that serves households with developmental disabilities, severe and persistent mental illness or mobility/sensory impairments.

Measure: Number of projects/units that serve special needs populations.

Objective 5: Encourage universal design features.

Measure: Number of affordable projects that incorporate universal design features.

Objective 6: Continue to review and refine the application process, minimizing barriers to accessing the program.

Measure: Provide for advisory groups for all funding rounds. Create opportunities for feedback from users (such as mailings, on-line feedback forms) to increase the number of suggestions received from program users and encourage participation.

Strategies:

Funding Strategy 1: Require housing credit projects, which typically receive gap financing, to provide a minimum number of universal design features.

Funding Strategy 2: Provide incentives to HDGF projects that serve special needs populations with supportive services; and provide universal design features. Seek feedback annually from program users on ways to improve the application process so that it does not become a barrier.

Housing Performance Measures

Activities: Community Housing Development Organization (CHDO) Operating Grant Program

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

Primary Objectives:

Objective 1: Offer continued support for eligible existing grantees that meet agreed upon benchmarks and milestones in the production of affordable housing.

Measure 1: The number and percent of existing CHDO grantees that meet identified benchmarks and milestones and housing production goals.

Measure 2: Number of affordable housing projects and units produced.

Objective 2: Expand the program to include Sustaining Grants to CHDO's with service areas located in City/County Participating Jurisdictions.

Measure 1: Number and percent of CHDO's with service areas located in City/County Participating Jurisdictions producing an agreed number of affordable housing units.

Measure 2: Number of affordable housing projects and units produced.

Objective 3: Offer Capacity Building Grants to CHDO's new to the program.

Measure 1: Number of CHDO's new to the program with service areas located outside of city/county Participating Jurisdictions producing an agreed upon number of affordable housing units.

Measure 2: Number of affordable housing projects and units produced.

Strategies:

Strategy 1: Fund the CHDO Operating Grant Program at $1 million annually.

Homeless and Supportive Housing Performance Measures

Activities: Homeless Crisis Response Program and Supportive Housing Program

Goal: To provide a continuum of housing/services to prevent persons from becoming homeless and rapidly re-housing persons when homelessness does occur by: providing homelessness prevention services and assistance; moving persons from homelessness to permanent housing through the provision of housing placement, emergency shelter, tenant-based supportive housing, and project-based transitional housing; and providing long-term permanent supportive housing to homeless persons with disabilities.

Primary Objectives:

Objective 1: Prevent persons entering and returning to homelessness

Measure 1: Increase percentage of persons appropriately deferred from emergency shelter
Measure 2: Decrease percentage of persons returning to emergency shelter after program exit

Objective 2: Transition persons from homelessness to stable housing as soon as possible

Measure 1: Reduce average length of stay (Emergency shelter)
Measure 2: Increase percentage of positive housing outcomes at exit
Measure 2: Retention of six months or more (Permanent supportive housing)

Objective 3: Increase self-sufficiency of program participants

Measure 1: Increased income upon exit (Emergency shelter, tenant-based supportive housing and project-based transitional housing)
Measure 2: Maintained income at recertification (Permanent supportive housing)

Strategies:

Strategy 1: Fund local governments, nonprofit organizations and eligible consortia to provide homelessness prevention, emergency shelter, project-based transitional housing, tenant-based supportive housing and permanent supportive housing, ensuring that all Ohioans have access to appropriate housing resources.

Strategy 2: Provide grantees with regular updates as to their progress on performance measures and offer guidance and technical assistance where necessary.

Community Development Performance Measures

Activities: **Community Development Program, Water and Sanitary Sewer Program, Imminent Threat Grants**

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

Primary Objectives (Outputs):

Objective 1: Improve the public facilities and infrastructure in lower-income areas through LMI area-wide benefit activities, in Slum and Blighted areas or on a spot slum and blight basis.

- **Measure 1:** Community development activities undertaken annually.
- **Measure 2:** Lower-income persons benefited by community development activities annually.

Objective 2: Provide direct assistance to LMI persons, such as housing assistance, or needed services currently unavailable in the community.

- **Measure 1:** Public service activities assisted annually through community development programs.

Secondary Objectives (Outcomes):

Objective 3: Revitalize lower-income neighborhoods and improve the quality of life for residents by addressing all or part of the identified community development needs and/or housing needs in 100 CAS areas annually.

- **Measure 1:** Number of activities located in CAS Investment Areas that address locally-identified needs.
- **Measure 2:** Number of LMI persons benefiting in from Investment area Community Development activities.

Objective 4: Address basic health and safety needs of low-and moderate-income persons.

- **Measure 1:** Households provided with potable water and/or sanitary sewage systems that meet state and federal standards
- **Measure 2:** Households and persons who are benefiting from improved fire protection due to equipment and facilities acquired or improved with community development assistance.
- **Measure 3:** Households and persons who health and safety is secured be addressing imminent or immediate threats caused be natural disasters or other causes.

Objective 5: Improve the quality of life for elderly persons and special needs populations by providing locally determined public services and facilities.

- **Measure 1:** Number of elderly or special needs persons assisted through public service activities.
- **Measure 2:** Number of elderly persons benefiting from construction or improvements to senior centers.
- **Measure 3:** Number of persons benefiting from modifications or improvements to public facilities that result in improved accessibility by disabled or special needs persons.

Objective 6: Maintain the cultural heritage of local communities through Historic Preservation activities.

- **Measure 1:** Number of historic building or sites that have been preserved or rehabilitated.

Strategies:

- **Strategy 1:** Assist 79 counties and 51 cities annually through the distribution of CDBG funds to address local community or economic development needs, housing needs or other needs.

- **Strategy 2:** Assist approximately 10-20 communities annually by distributing funding for safe potable water and adequate sanitary sewage.

Economic Development Performance Measures

Programs: **CDBG Economic Development Program**
Microenterprise Business Development Program
Local Revolving Loan Funds

Goal: The principal goal of the Economic Development Program is to create and retain permanent, private-sector job opportunities, principally for low- and moderate-income persons, through the expansion and retention of business and industry in Ohio communities.

Primary Objectives (Outputs):

Objective 1: Create/retain 750 jobs and at least 383 jobs for LMI persons.

Measure 1: Number of total jobs created and retained, and for LMI persons.

Objective 2: Provide assistance such that the average total cost per job created/retained is $10,000 or less

Measure 1: Average annual cost per job

Objective 3: Maximize participation of other resources such that projects average at least $10 of other funds for $1 CDBG funds (average per year).

Measure 1: Total other funds leveraged annually.

Secondary Objectives (Outcomes):

Objective 4: Improve the economic health and sustainability of local communities by adding to the overall business payroll which will allow for improved services as a result increased tax revenues from income, property and sales taxes, and an overall increase in local commerce.

Measure 1: Projected annual income tax receipts from jobs created or retained.
Measure 2: Projected annual property tax receipts from construction or expansion of business facilities.
Measure 3: Projected sales taxes receipts from product sales of assisted business
Measure 4: Projected payroll and impact on local economy from additional dollars expended in the local economy as a result of jobs created or retained.

Objective 5: Expand economic opportunities by increasing the number of “high value” (high-technology/ manufacturing) jobs in local communities.

Measure 1: Number of “high value” businesses assisted.

Objective 6: Provide training and financial support to prospective business owners to facilitate the creation of new small businesses.

Measure 1: Number of microenterprise businesses that are established annually in conjunction with program assistance.

Objective 7: Support the revitalization and rejuvenation of distressed areas through investment in new businesses and/or retention of existing businesses located in state designated distressed areas, designated downtown revitalization areas, communities with a large proportion of LMI populations, or business that serve LMI neighborhoods.

Measure 1: Number of businesses assisted in distressed areas.

Measure 2: Number of businesses assisted in downtown revitalization areas.

Measure 3: Number of businesses assisted in state enterprise zones.

Measure 4: Number of businesses assisted serving LMI neighborhoods.

Objective 8: Support the creation of "living wage" jobs that are created or retained through program assistance.

Measure 1: Number and percent of jobs that are created or retained that exceed 150% of the poverty level.

Measure 2: Number and percent of jobs created or retained that provide employee health benefits.

Strategies:

Strategy 1: Commit funds to the CDBG Economic Development Program to assist a total of approximately 20 communities annually.

Strategy 2: Provide grants to local communities that will loan funds to businesses for purchase of machinery and equipment, acquisition and improvements to land and buildings, and related costs that will enable businesses to create or retain jobs.

Strategy 3: Provide grants to local communities in order to fund necessary public infrastructure improvements that will enable businesses to create or retain jobs.

Strategy 4: Commit fund annually to assist communities to provide funds for training and assisting local prospective business owners to create new microenterprise businesses.

Strategy 5: Permit communities to administer local Economic Development Revolving Loan Funds to loans to local business or for development-related infrastructure to create and retain jobs.

Economic Development Performance Measures

Programs: **Comprehensive Downtown Revitalization Program**

Goals: The principal goals of the Comprehensive Downtown Revitalization Program are:

(1) to assist in the revitalization of Central Business Districts;
(2) to aid in the elimination of slums and blight; and
(3) to create and retain permanent, private-sector job opportunities, principally for persons from low- and moderate-income households.

Primary Objectives (Outputs):

Objective 1: Eliminate blighting conditions by rehabilitating buildings and facades located in areas that have been designated as distressed based on HUD criteria.

Measure 1: Number/percent of building facades rehabilitated.

Objective 2: Eliminate blighting conditions by upgrading infrastructure in the designated downtown revitalization area.

Measure 1: Extent of public infrastructure improvements (Linear feet of Curbs, Streets, Sidewalks; Square feet of parking lots, etc.).

Secondary Objectives (Outcomes):

Objective 3: Improve or stabilize the business climate downtown.

Measure 1: Decreased vacant floor space downtown.
Measure 2: Increase in the number of businesses downtown.
Measure 3: Increase participation in merchants/business association.

Objective 4: Preserve the cultural and architectural heritage of local downtowns in Ohio.

Measure 1: Number of historic building or sites that have been preserved.

Strategies:

Strategy 1: Commit funding to the Comprehensive Downtown Revitalization Program to assist at least 5 communities to revitalize downtown areas annually.

Strategy 2: Commit funding to the Community Development Discretionary Program to assist with funding “target of opportunity” downtown projects.

Monitoring

The Office of Community Development (OCD) conducts monitoring visits at least once prior to the close out of a grant. Also, both OCD and OHFA staff provide technical assistance to CHIP and HDAP grantees, either via telephone, meetings at the state offices, or, if warranted, via site visits. Most post award on-site technical assistance is provided to CHIP grantees, whose programs sometimes involve activities that are new to the local program or involve new local staff. HDAP grants are for projects, rather than programs, and are typically implemented by agencies which have considerable housing development experience. Thus, there is not a significant need for on-site post award technical assistance in most HDAP projects. The Community and Economic Development Section also meet with Community Development Block Grant (CDBG) Formula Allocation grantees prior to application submittal to ensure eligibility and national objective compliance. Generally, staff conducts a minimum of 30 monitoring/technical assistance visits during the program year (July 1 – June 30). Also, on a calendar year basis the ODOD Audit Office conducts financial audits of selected grant recipients. OCD provides the Audit Office with a selected list determined by each section supervisor based on size of grant and complexity of the program. The Audit Office adds a number of recipients based on random selection of receipts and grant disbursements.

Monitoring Procedures

The purpose of a monitoring visit is to examine some selected activities to determine that:

1. Activities meet OCD, State and/or HUD requirements.
2. Projects are being managed timely and responsibly.
3. Activities are being implemented in conformance with the application and grant agreement.

The visit is not intended to be a comprehensive in-depth audit of all activities and programs undertaken by the grantee, nor do staff resources permit such an approach.

Site visits are selected based on empirical evidence reviewed by management and community development/housing specialists regarding the expertise of grantees, program complexity, or number of grants operated by a particular recipient. The staff will monitor certain programmatic areas based on previous findings in that specific area or if the particular programmatic function has not been monitored in the past few years.

If the initial review by an OCD staff member uncovers specific problem areas, a program specialist (financial, procurement, acquisition/relocation, etc.) will be sent to do a detailed review of a particular program area.

At the conclusion of a monitoring visit, the staff person must conduct an exit conference with the grantee to review the results of the visit and describe any deficiencies found during the monitoring visit. Within 45 days following a monitoring visit, a monitoring report is prepared by staff, and reviewed by the section supervisor. All monitoring tools and work papers must be placed in the Central File. Grantees have 45 days in which to respond to the monitoring report, and a response is required if either a “finding” or an “advisory concern” is made in the report.

A computerized monitoring tracking system enables OCD staff to quickly determine problem areas and/or grantees in need of monitoring as well as tracking to ensure that all grants are indeed monitored prior to close out.

Monitoring Standards

There are two types of determinations that can be made as a result of a monitoring visit:

A “Finding” is a deficiency that is a direct violation of the law/regulation or the grant agreement (which incorporates the application documents and attendant commitments). It also is a lack of appropriate documentation that would not substantiate that the grantee has followed grant or statutory requirements. All findings will require the grantee to respond and rectify the cited deficiency.

An “Advisory Concern” is any other deficiency that, although is not a violation itself, may eventually lead to a violation and a “finding.”

It is the responsibility of the OCD staff person to track the outstanding findings and advisory concerns. If the grantee has not responded within the appropriate time, staff must contact the grantee in writing with follow-up letters until all issues are resolved. Once all issues are resolved, a written release is sent to the grantee.

Program-Specific Requirements

HOME Program

1. **First-Time Homebuyers**

Some of the HOME assistance may be provided to first-time homebuyers. To ensure affordability, the HOME program requires an affordability period based on the amount of HOME assistance that enabled the homebuyer to buy the dwelling unit. Grantees must enforce a resale or recapture requirement if the property is sold or title is transferred prior to the completion of the affordability period.

There are two options regarding controlling the resale of homebuyer properties during the affordability period:

Option 1 -- Create Another Unit by "Recapturing" the HOME Investment

- Recapture provisions allow the grantee to recapture all or a portion of the HOME funds if the unit is sold or title transferred within the required affordability period. The grantee may choose to reduce the HOME funds to be recaptured on a prorated basis for the portion of the time the homeowner has occupied the unit.

- Recaptured HOME assistance must be used to assist other low-income HOME beneficiaries.

- If insufficient equity exists in the property at sale, the regulations permit the seller to repay an amount less than the full HOME assistance.

- HOME funds subject to recapture include any direct assistance, but excludes the amount between the cost of producing the unit and the market value of the property (i.e., the development subsidy) to the homebuyer that reduced the purchase price from fair market value to an affordable price or any downpayment or subordinate financing provided on behalf of the purchase.

Option 2 -- Sell the Existing Property to a Subsequent Low-Income Purchaser

- Resale requirements must ensure that the home will be sold to a low-and moderate-income family and the property will continue to be used as a principal residence for the balance of the affordability period.

- For the housing to remain affordable, the subsequent purchaser's monthly payments of principal, interest, taxes and insurance cannot exceed 30 percent of the gross income for a family with an income equal to or less than 80 percent of median income for the area

- Deed restrictions or other similar mechanisms must be used to guarantee the resale restrictions, 24 CFR 92.254.

- Resale provisions -- that is, the affordability period restrictions on sale of the property -- are waived if the homeowner defaults on the first mortgage and foreclosure proceedings are initiated.

- Under the resale option, the period of affordability is based on the total amount of HOME funds invested in the housing, including any development subsidy.

The choice of Option 1 or Option 2 must be documented in the Grantee's Program Description. The affordability period is based on the amount of HOME funds provided as direct assistance for recapture option or total amount of HOME funds for resale option.

HOME Amount per Unit	Minimum Period of Affordability (years)
Under $15,000	5
$15,000 - $40,000	10
Over $40,000	15

2. **Other Forms of Investment**

Experience with other housing programs, particularly in rural areas, has shown that a number of people have acquired their homes under land contracts. To permit the housing rehabilitation program to address these units, staff has developed procedures for allowing the current owner to sign legal documents, which require the land contract purchases to assume these obligations when the property is transferred. This procedure will be continued under the HOME Program.

Because many of the state programs deal with lower income elderly clients with special family needs and circumstances, the state will allow elderly clients with Life Estate arrangements to be eligible for receiving HOME assistance.

3. **Minority Business Enterprise Division**

ODOD provides several assistance programs for minority and women owned businesses. The Minority Business Enterprise Division is the state administrator of the Minority Contractors and Business Assistance Program (MCBAP). The eight MCBAPs serve clients in areas of the state with the highest concentration of minority populations, including Akron, Cincinnati, Cleveland, Columbus, Dayton, Portsmouth, Toledo, and Youngstown. Services provided to minority owned businesses include management, technical, financial, contract as loan, grant and bond packaging services at no cost. ODOD also houses the Minority Development Financing Advisory Board, which offers financing for fixed assets to state certified minority owned businesses.

The Women's Business Resource Program provides assistance for women owned businesses through direct client services and through participation in various local programs and conferences.

The MBE and WBE programs provided through ODOD conduct their own outreach and marketing efforts, and will provide these resources to businesses interested in participating in the CDBG or HOME programs.

In addition, the state will require that state recipients and subrecipients adopt their own MBE and WBE policies. At a minimum, the recipient or subrecipient must publicly state their MBE and WBE policy in the local print media with the widest circulation at least once annually. The local MBE/WBE policy must provide that, at least once annually, the local recipient or subrecipient will solicit the participation of MBE/WBE firms that wish to receive bids for projects funded through the HOME and CDBG Programs.

4. **Affirmative Marketing Policy**

State recipients and subrecipients receiving HOME funds shall adopt policies and procedures that inform the public, potential tenants, and property owners of its Affirmative Marketing Policy. At a minimum, the Affirmative Marketing Policy of a state recipient must commit to including the Equal Housing Opportunity logotype in press releases and solicitations for participation in the HOME Program. The state recipient will also have a policy for referrals of questions and complaints to an agency or organization that can provide advice on federal housing laws. At least once annually, state recipients will conduct a public outreach effort that will make information available to the public on rental units that have received HOME assistance. Minimally, this information will include the address of the units, the type of units, and the address and phone number of the owner.

At a minimum, the Affirmative Marketing Policy will require that owners of projects containing five or more units receiving HOME assistance will comply with the following requirements:

1. Subsequent to receiving HOME assistance and throughout the period of affordability, the owner shall annually provide information on HOME-assisted units to an agency that serves LMI persons.

2. If any units are publicly advertised during the period of affordability, the Equal Opportunity Housing Logo must accompany the advertisement.

3. The owner must display the Equal Housing Opportunity logo and fair housing poster in an area accessible to the public (e.g., the rental office).

4. The owner will maintain information on the race, sex, and ethnicity of tenants to demonstrate the results of the owner's affirmative marketing efforts.

5. The owner will, for the period of affordability, maintain information demonstrating compliance with sections 1, 2 and 4 above, and will make such information available to the state recipient, subrecipient or the state of Ohio upon request.

Each recipient or subrecipient shall maintain records indicating compliance with the above policies, including:

1. Records documenting the recipient's or subrecipient's annual outreach efforts to Affirmatively Market HOME-assisted units. The state (or state recipients in the case of decentralized programs) will conduct an annual evaluation of the effectiveness of these efforts. Minimally, this evaluation shall include a discussion with the organizations or agencies identified in section 1 above as to the number of referrals made on the basis of the information provided by the owners of HOME-assisted units.

   The evaluation may also include a review of the information maintained pursuant to section 4 above to review the characteristics of the tenant population for specific projects.

2. Monitoring records (to be maintained by the recipient or subrecipient) of owners of HOME-assisted units that indicate the extent to which the owner has complied with the requirements of sections 1, 2, 3, 4 and 5 above, and remedies to resolve instances of non-compliance.

Policies of the Office of Community Development

City Status

For purposes of the federal programs administered under this Consolidated Plan, municipalities that attain city status must provide evidence of city designation from the Ohio Secretary of State by January 1st of the year of the effective date of the Consolidated Plan.

CDBG

Program Income

Under Section 104(j) of the Act, states are authorized to distribute program income when such income has been returned from local communities.

Ohio Small Cities CDBG Program guidelines are such that most program income derived from the administration of local grantee funds stays at the community level. Local grantees must expend their program income according to CDBG regulations and the OCD Financial Management Rules and Regulations Handbook, Attachment 12, which can be viewed at http://development.ohio.gov/cms/uploadedfiles/CDD/OHCP/Attachment12-ProgramIncomePolicy.pdf. Any program income returned to the State, due to the community's unsatisfactory compliance with statutory and regulatory requirements, will be distributed to eligible CDBG programs at the discretion of OCD, based on program need and timeliness requirements.

If a local grantee community lacks the capacity to administer program income, any income that the community receives as result of a grant activity (and which is governed by HUD or federal program income regulations) must be returned to the state.

Program income may be retained by the unit of general local government if the program income will be used to continue the activity from which the program income was derived. The state will determine when an activity will be considered to be continued. Funds not to be expended in that same manner must receive prior approval from the state

Smaller units of government that do not have an ongoing grant relationship with OCD, or an existing Economic Development Revolving Loan Fund, will be required to arrange Revolving Loan Fund agreements with the county in which the community is located.

Recaptured Funds

Based on past experience, the State expects to recapture CDBG funds from local grantees for the following reasons: (1) questioned costs; (2) unallowable costs; (3) unspent funds, or funds not drawn down by local grantees after local program completion; and (4) funding commitments for local projects which do not get underway within allowable time periods.

Recaptured funds will be distributed by the state will be transferred to the appropriate program, at the discretion of OCD, in order to meet timeliness requirements.

Program Set-Aside Fund Balance

Unless otherwise provided in the State Consolidated Plan, program set-aside funds, which remain at the end of the Fiscal Year, will be transferred to the appropriate program, at the discretion of OCD, in order to meet timeliness requirements.

HOME Program Income

OCD will allow local governments to maintain and expend HOME program income on OCD-approved, HOME-eligible activities. However, program income funds must be expended before a grantee may receive additional HOME dollars to expend on a like activity.

In addition, OCD will allow grantees to expend up to 10% or $50,000, whichever is less, of HOME program income expected to be received in a calendar year for administrative expenses. Grantees are required to report to OCD on program income annually.

OCD requires communities that administer CDBG or HOME program income through a local Revolving Loan Fund (RLF) to submit their RLF Administration Agreements to OCD every three years for review and approval.

Reallocated Funds

The State does not expect to receive any reallocated funds, which HUD has recaptured from Small Cities grantees during the upcoming year.

Undistributed Funds

If it appears likely that funds allocated to the state's programs will not be distributed within the allotted timeframe for the program, the State reserves the right to transfer any and all programs' undistributed balance to other programs that have a need for additional funding. Funds set aside for the Economic Development Program which are not substantially committed to specific projects by the end of April, will be transferred to the appropriate program, at the discretion of OCD, in order to meet timeliness requirements.. Funds allocated for the Water and Sanitary Sewer Program that are not committed to specific projects by the end of May will be transferred to the Community Development Program. Undistributed CHDO Operating Grant Program funds will be transferred to the Community Housing Improvement Program.

Use of Funds for Technical Assistance

The State reserves its right to use up to one percent (1%) of each annual allocation it received from HUD to provide technical assistance to local units of government and other entities and individuals eligible for assistance under the State CDBG Program.

Waiver of Plan Requirements

Should two units of local government be unable to establish or maintain a mutually satisfactory working relationship with regard to administration of the CDBG Formula Allocation or Economic Development Programs, one or both units of government may request that the Office of Community Development (OCD) waive the requirements of the applicable portion of the State plan. The unit of local government requesting a waiver shall present in writing documentation of attempts that have been made to comply with the administration plan, the reasons why compliance is not possible, and submit to OCD a request for a waiver signed by the chief local elected official. Only cities designated as "Acquired Cities" are eligible for a waiver under the Formula Allocation Program.

Upon receipt of a written request for a waiver, OCD shall take the following steps:

(1) Conduct an investigation of the issues;
(2) Hold at least one meeting with representatives of both units of local government in an attempt to resolve the issues; and
(3) Make a determination no later than 15 working days from the receipt of a written request for a waiver.

A waiver shall be granted only if:

(1) OCD is satisfied that all reasonable attempts have been made to comply with the requirements of the plan;
(2) OCD determines that some unusual or unique circumstances exist that prevent the requirements of the CDBG administration plan from being met; and
(3) Granting a waiver would best achieve the objective of the plan.

Should the units of government not agree with the determination of the Office of Community Development, they may request, in writing, review by the Director of the Community Development Division, who shall make a decision within 10 working days.

Amendment Policy

Situations requiring an amendment:

1. An amendment to an executed grant agreement is required if the grantee is proposing a new activity. A public hearing is required for a new activity and a 10-day public notice must precede the hearing.
2. An amendment to an executed grant agreement is required if there is a substantial change in an approved project or activity scope, location or design, number and type of beneficiaries, anticipated accomplishment, or national objective. In addition, a public hearing is required and must be preceded by a 10-day notice.
3. An amendment to an executed grant agreement is required if the amount most recently approved by OCD for any previously approved activity is being increased or decreased by more than $5,000 or 10%, whichever is greater. These thresholds must be applied to both the activity from which the funds are to be removed and the activity to which the funds will be added. Increases or decreases less than this threshold will be reconciled during the closeout process. The administration cap may not be exceeded. For competitive programs, 90% of outcomes must be met for an activity prior to requesting an amendment to reduce funds in that activity. Additional restrictions or exceptions may be included in the guidelines for each program.
4. Activity outcomes may also be reduced by up to 10%, without an amendment, as a result of moving funds from one activity to another in order to meet an increased demand in another activity. However, outcomes may not be reduced without an amendment for other reasons.

   Amendments must be reviewed and approved by OCD prior to implementation of the proposed change.

   Due to the nature of competitive programs, grantees are discouraged from making any changes to their programs. Therefore, amendments to competitive programs will be considered during future funding application reviews.

Community-Based Alternatives for Individuals with Disabilities

In Olmstead v. L.C., 527 U.S. 581 (1999) (the "Olmstead decision"), the Supreme Court construed Title II of the ADA to require placement of qualified individuals with mental disabilities in community settings, rather than in institutions, whenever treatment professionals determine that such placement is appropriate, the affected persons do not oppose such placement, taking into account the resources available and the needs of others with disabilities. The state will support localities' efforts to help people who are institutionalized to have the opportunity to live close to their families and friends, to live more independently, to engage in productive employment, and to participate in community life.

The state will support strategies and policies that foster independence and participation in the community for all individuals with disabilities that are served by programs and activities assisted with funding distributed through the Ohio Consolidated Plan.

The state will not support disability-based discrimination in services, programs, or activities. However, the state will allow the grantee to assist housing, provide programs and services that benefits specific disability subgroups when it is documented that there is an unmet need for the housing, services, and programs.

Preferences for Persons with Disabilities

The state permits grantees to develop client selection criteria for which serve the entire community but gives a preference to persons with a special need(s).

Special needs preferences may target a specific category of individuals with disabilities (e.g., persons with HIV/AIDS or chronic mental illness) if the specific category is identified in the Consolidated and Local Plans as having unmet housing needs and the preference is required to narrow the gap in benefits and services received by such persons. However, if a grantee has a preference for persons within a class or category of disability (such as persons with HIV/AIDS or chronic mental illness), the grantee cannot discriminate against persons who fall within that class based on the presence of other disabilities. The local written selection criteria must explain what the preferences are and how the preferences will be implemented.

All programs and activities are subject to the applicable fair housing requirements, and preferences must be administered in a nondiscriminatory manner. This means that if a special needs preference is established, affirmative marketing of the availability of activity across all protected classes within the preference must be carried out.

When a grantee chooses to serve a particular group of persons with specialized housing activity or program, the grantee cannot then restrict access to its other activities for the identified group. For example, a grantee may not determine that since it will provide a preference to persons with special needs under its TBRA program, it will therefore limit participation by those special needs persons in its homeownership or other affordable housing programs or forms of assistance.

When combining programs, grantees must keep in mind that the rules and regulations of all programs must be met.

Local Government Certifications to the State

Title I, Section 106, of the Housing and Community Development Act of 1974, as amended, requires that no amount may be distributed by the State under the CDBG program to any unit of general local government in a nonentitlement area unless such unit of general local government certifies that:

(1) It will minimize displacement of persons as a result of activities assisted with such amounts;

(2) Its program will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 USC 2000d et seq.) and the Fair Housing Act (42 USC 3601-20), and that it will affirmatively further fair housing;

(3) It is following a detailed citizen participation plan which:

(a) provides for and encourages citizen participation, with particular emphasis on participation by persons of low and moderate income who are residents of slum and blight areas and of areas in which section 106 funds are proposed to be used, and in the case of a grantee described in section 106(a), provides for participation of residents in low- and moderate-income neighborhoods as defined by the local jurisdiction;

(b) provides citizens with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds, as required by regulations of the Secretary, and relating to the actual funds under this title;

(c) provides for technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals with the level and type of assistance to be determined by the grantee;

(d) provides for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least the development of needs, the review of proposed activities, and review of program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the disabled;

(e) provides for a timely written answer to written complaints and grievances, within 15 working days where practicable; and

(f) identifies how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate. This paragraph may not be construed to restrict the responsibility or authority of the grantee for the development and execution of its community development program.

(4) It will not attempt to recover any capital costs of public improvements assisted in whole or in part under Section 106 or with amounts resulting from a guarantee under Section 108 by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless (i) funds received under Section 106 are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from resources other than under this title; or (ii) for purposes of assessing any amount against properties owned and occupied by persons of low and moderate income, the grantee certified to the State it lacks sufficient funds received under Section 106 to comply with the requirements of clause (i);

(5) In order to receive Title I funds, it will adopt and enforce a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstration within its jurisdiction; and

(6) The chief executive officer of the unit of general local government certifies, to the best of his or her knowledge and belief, that:

(a) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal Contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant loan, or cooperative agreement;

(b) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form - LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions;

(c) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly; and,

(d) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

The program certifications, which are listed above, will be contained in the grant agreement between the State and units of general local government receiving CDBG funds. At the time of grant agreement execution, grantees are also required to sign these certifications and to ensure that the requirements are met during the implementation of the grantees' program activities.

The Housing and Community Development Act of 1974, as amended through October 28, 1992, and 24 CFR 570.487 (b) require that a local unit of government that participates in the Community Development Block Grant (CDBG) Program is required to certify that it will affirmatively further fair housing choice. The certification is found in the grant agreement with the State. Similar fair housing strategies are required if the local unit of government is participating in the HOME Investment Partnerships Program (24 CFR 92.350 and 351).

As defined in 24 CFR 570.487 (b)(2)(i), "fair housing choice" means the ability of persons of similar income levels, regardless of race, color, religion, sex, national origin, familial status, or disability, to have available to them the same housing choices. HUD defines "impediments to such housing choices" as any actions, omissions, or decisions taken because of race, color, religion, sex, national origin, familial status, or disability, which restrict housing choices or the availability of housing choices.

Units of local government receiving CDBG or HOME funds are required to develop and conduct activities to assure nondiscrimination in public and private housing transactions.

To comply with the certification:

(1) Units of local government receiving State CDBG or HOME funds for the first time must conduct, or be covered by, an analysis to determine the impediments to fair housing choice within their respective communities. The analysis must cover impediments based on race, color, creed, sex, national origin, age, disability, and familial status.

Based upon the conclusions of this analysis, recipients must identify and develop proposed actions to affirmatively further fair housing at the local level. Additionally, the proposed actions must meet the State's minimum fair housing program requirements [See item (3) below].

The analysis and proposed actions must be submitted to the State for review and approval within three months of grant award. (The delay in conducting a fair housing analysis; however, cannot be used as justification for delaying actions to affirmatively further fair housing. The Fair Housing Act, as amended, is applicable in its own terms because the HCDA expressly makes the Fair Housing Act applicable to the CDBG and HOME programs.)

Proposed fair housing actions and the analysis should be presented in the application whenever possible. If the unit of local government is covered by a current analysis and actions being undertaken as a requirement of the Formula Allocation Program or another current approved State CDBG or HOME program, a certification of coverage, and identification of the current program identifying the administering local unit of government and agency of the on-going program must be submitted in the application. However, OCD may require additional actions if the unit of local government is not receiving adequate coverage and/or it is participating in housing programs.

Local units of government must carry out and clearly document that they have carried out the appropriate official actions, relating to housing and community development, to remedy or mitigate those conditions limiting fair housing choice.

(2) Units of local government previously receiving State CDBG or HOME funds are expected to continue to update their analysis to determine the impediments to fair housing choice within their respective communities. The analysis must cover impediments based on race, color, creed, sex, national origin, age, disability, and familial status.

Based upon the conclusions of this analysis, recipients must identify and develop proposed actions to affirmatively further fair housing at the local level. Additionally, the proposed actions must meet the State's minimum fair housing program requirements [See item (3) below.]

The proposed actions must be submitted to the State for review and approval with the Formula Allocation Program or another approved current State CDBG program. In the latter case, a certification of coverage, an identification of the current program identifying the administering local unit of government and agency of the on-going program must be submitted in the application. However, OCD may require additional actions if the unit of local government is not receiving adequate coverage and/or it is participating in housing programs.

Local units of government must carry out and clearly document that they have carried out the appropriate official actions, relating to housing and community development, to remedy or mitigate those conditions limiting fair housing choice.

(3) The State's minimum fair housing program requirements are:

(a) Conduct or update an analysis of impediments to fair housing choice. In cases where a unit of local government is not specifically covered by the Formula analysis, an analysis must be conducted within three months of approval of its application for CDBG or HOME funds.

(b) Appoint a local fair housing coordinator, who is an employee of the unit of local government, who will generally be accessible Monday through Friday. A consultant or local agency may be substituted if reasonable access to the provider can be assured and upon written approval of OCD. The name, agency, address, and phone number must be reported to OCD and approved.

(c) Establish and implement a process to receive fair housing complaints and forward the complaint to the Ohio Civil Rights Commission, which is charged with investigation and enforcement. Records must describe the type of referral, copies of Housing Discrimination Complaint records (HUD-903 or equivalent), date of the referral, and any follow-up action.

(d) Conduct training to provide education material and activities to:

(i) Residents of areas in which CDBG or HOME activities are being undertaken; or to special populations affected by the activities;

(ii) Three civic groups or schools; and

(iii) If undertaking homebuyer education, training must contain a fair housing component.

Provide an agenda, minutes, a description of the audience, and any follow-up to occur for each session.

(e) Develop and distribute fair housing information and materials (posters, brochures, or materials) to 10 area agencies, organizations, or public events (county fair, post office, employment services office, etc.). The telephone number (including a telephone number for use by the hearing impaired) of the local fair housing coordinator must be revealed in this information or materials. A list of the places of distribution, dates of distribution, and estimated quantities of material distributed must be maintained. If a unit of local government is undertaking residential rehabilitation or new construction, tenant based rental assistance or down payment assistance, fair housing information must be provided to each applicant and/or recipient of assistance.

(f) If a unit of local government has a fair housing resolution or ordinance, the resolution or ordinance must include coverage for all protected groups.

State review and approval of fair housing programs are required.

(4) Other fair housing actions may be required if:

(a) The analysis of the impediments to fair housing reveals that other actions would be necessary to assure nondiscrimination in public and private housing transactions.

(b) The unit of local government is participating in a rental rehabilitation program. An affirmative marketing plan may be required. Local units of government participating in rehabilitation of HOME- or CDBG-assisted housing containing five or more housing units are required to adopt affirmative marketing procedures and requirements and provide owners with affirmative marketing and tenant landlord information or training.

(5) Other activities units of local governments may undertake to affirmatively further fair housing are:

(a) Adopt a local fair housing ordinance or resolution.

(b) Provide housing discrimination/investigation service (testing).

(c) Review publishers of advertisements (newspaper ad, radio ad) for discriminatory advertisements. Provide publishers, real estate firms, banks, savings and loan associations with fair housing advertising guidelines.

(d) Sponsor community awareness events, such as poster, speech, and writing contests.

(e) Develop lists of both public and private housing accessible to persons with disabilities.

(f) Review local zoning laws and procedures to determine whether they contribute to, detract from, fair housing choice.

Grantee Assurances

The following assurances will be contained in the grant agreement between the state of Ohio and the Grantee.

The Grantee hereby assures and certifies that:

(a) It possesses legal authority to apply for and accept the grant, and to execute the proposed program.

(b) Its governing body has duly adopted or passed as an official act a resolution, motion or similar action authorizing the filing and acceptance of the application, including all understandings and assurances contained therein, and directing and authorizing the person identified as the official representative of the applicant to act in connection with the application and to provide such additional information as may be required.

(c) It has complied with all clearinghouse requirements and that either:

(1) Any comments and recommendations made by or through clearinghouses will be considered and appropriate remedial action(s) will be taken; or

(2) The required procedures were followed and no comments or recommendations were received.

(d) It has facilitated or will facilitate citizen participation by:

(1) Providing adequate notices for two public hearings 10 days in advance of the hearing;

(2) Holding two hearings on the proposed application before adoption of a resolution or similar action by the local governing body authorizing the filing of the application. The first hearing must present all State CDBG programs and allow citizen input, while the second hearing must be held to discuss specific application proposals that the community intends to submit (the community need only hold the first hearing once annually to discuss the current fiscal year CDBG programs);

(3) Providing for citizen participation by holding one public hearing when considering amendments to the community development program; and

(4) Following a detailed citizen participation plan which:

(i) Provides for and encourages citizen participation, with particular emphasis on participation by persons of low and moderate income who are residents of slum and blight areas and of areas in which section 106 funds are proposed to be used, and in the case of a grantee described in section 106(a), provides for participation of residents in low- and moderate-income neighborhoods as defined by the local jurisdiction;

(ii) Provides citizens with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds, as required by regulations of the Secretary, and relating to the actual funds under this title;

(iii) Provides for technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals with the level and type of assistance to be determined by the grantee;

(iv) Provides for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least the development of needs, the review of proposed activities, and review of program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the disability;

(v) Provides for a timely written answer to written complaints and grievances, within 15 working days where practicable; and

(vi) Identifies how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate. This paragraph may not be construed to restrict the responsibility or authority of the grantee for the development and execution of its community development program.

(e) Its chief executive officer or other officer of applicant approved by the state:

(1) Consents to assume the status of a responsible Federal Official under the National Environmental Policy Act of 1969 insofar as the provisions of such Act apply to 24 CFR 570 and to the Ohio Small Cities CDBG Program.

(2) Is authorized and consents on behalf of the applicant and himself to accept the jurisdiction of the Federal courts for the purpose of enforcement of his responsibilities as such an official.

(f) The Community Development Program has been developed so as to give maximum feasible priority to activities which will benefit low- and moderate-income families or aid in the elimination of slums or blight.

[The requirement for this certification will not preclude the State from approving an application where the applicant certifies, and the State determines, that all or part of the Community Development Program activities are designed to meet other community development needs having a particular urgency as specifically explained by the applicant in accordance with 570.483(d)].

(g) It will comply with the regulations, policies, guidelines and requirements of the "Common Rule" 24 CFR Part 85, and Federal Management Circular A-87 and OMB Circular A-128 as they relate to the application, acceptance, and use of Federal funds under this part.

(h) It will comply with:

(1) Section 110 of the Housing and Community Development Act of 1974, as amended, 24 CFR 570.487, and State law and regulations regarding the administration and enforcement of labor standards;

(2) the Provisions of the Davis-Bacon Act (46 U.S.C. 276a) with respect to prevailing wage rates (except for projects for the rehabilitation of residential properties of fewer than eight units);

(3) the Contract Work Hours and Safety Standards Act of 1962, 40 U.S.C. 327-332, that mechanics and laborers (including watchmen and guards) employed on federally assisted contracts be paid wages of not less than one and one-half times their basic wage rates for all hours worked in excess of 40 in a work-week; and

(4) the Federal Fair Labor Standards Act, 29 U.S.C. 201 et seq., requiring that covered employees be paid at least the minimum prescribed wage, and also that they be paid one and one-half times their basic wage rate for all hours worked in excess of the prescribed work-week.

(i) It will comply with all requirements imposed by HUD and the State concerning special requirements of law, program requirements, and other administrative requirements, approved in accordance with 24 CFR Part 85.

(j) It will comply with the provisions of Executive Order 11296, relating to evaluation of flood hazards and Executive Order 11288 relating to the prevention, control, and abatement of water pollution.

(k) It will require every building or facility (other than a privately owned residential structure) designed, constructed, or altered with funds provided under this Part to comply with the "American Standard Specifications for Making Buildings and Facilities Accessible to, and Usable by, the Physically Handicapped," Number A-117.1-R 1972, subject to the exceptions contained in 41 CFR 101-19.604. The applicant will be responsible for conducting inspections to ensure compliance with these specifications by the contractor.

(l) It will comply with:

(1) Title VI of the Civil Rights Act of 1964 (Pub. L. 88-352), and the regulations issued pursuant thereto (34 CFR Part 1), which provides that no person in the United States shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the applicant receives Federal financial assistance and will immediately take any measures necessary to effectuate this assurance. If any real property or structure thereon is provided or improved with the aid of Federal financial assistance extended to the applicant, this assurance will obligate the applicant, or in the case of any transfer of such property, any transferee, for the period during which the real property or structure is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits.

(2) Title VIII of the Civil Rights Act of 1968 (Pub. L. 90-284), as amended by the Fair Housing Amendments Act of 1988 (Pub.L. 100-430, 102 Stat. 1619) and 24 CFR 570.487(a) and (b) require local units of government receiving and/or administering all programs and activities relating to housing and community development in a manner to affirmatively further fair housing; and will take action to affirmatively further fair housing in the sale or rental of housing, the financing of housing, and the provision of brokerage services.

(3) The Age Discrimination Act of 1975 that no persons in the United States shall on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

(4) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794), that no otherwise qualified disabled individual in the United States shall, solely by reason of his or her disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance from HUD.

(5) Executive Order 12259, Leadership and Coordination of Fair Housing in Federal Programs, requiring that programs and activities relating to housing and urban development be administered in a manner affirmatively to further the goals of Title VIII of the Civil Rights Act of 1968.

(6) Section 109 of the Housing and Community Development Act of 1974, as amended, and the regulations issued pursuant thereto (24 CFR Part 570.601), which provides that no person in the United States shall, on the grounds of race, color, national origin, or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with funds provided under this Part.

(7) Executive Order 11063 as amended by Executive Order 12259 to take all action necessary and appropriate to provide equal opportunity and nondiscrimination in the sale, leasing, rental, or other disposition of residential property and related facilities provided in whole or in part by Federal Assistance.

(8) Executive Order 11246, as amended by Executive Orders 11375 and 12086 and the regulations issued pursuant thereto (24 CFR Part 130 and 41 CFR Chapter 60), which provides that no person shall be discriminated against on the basis of race, color, religion, sex or national origin in all phases of

employment during the performance of Federal and Federally assisted construction contracts. Contractors and subcontractors on Federal and federally assisted construction contracts shall take affirmative action to ensure fair treatment in employment, upgrading, demotion or transfer, recruitment advertising, layoff or termination, rates of pay or other forms of compensation and selection for training and apprenticeship.

(9) The Architectural Barriers Act of 1968 (42 U.S.C. 4151-4157; 24 CFR Part 40) requirements for accessibility by physically disabled persons.

(10) Americans with Disabilities Act, as amended (ADA) 28 CFR Part 35 and Part 36.

(11) Title IX of the Education Amendments Act of 1972, which prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

(12) Executive Order 12892, as amended, which requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

(13) Executive Order 12898, which requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

(14) Executive Order 13166, which eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally-assisted and federally conducted programs and activities.

(15) Executive Order 13217, which requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

(m) It will comply with Section III of the Housing and Urban Development Act of 1968, as amended, requiring that to the greatest extent feasible opportunities for training and employment be given to lower-income residents of the project area and contracts for work in connection with the project be awarded to eligible business concerns which are located in, or owned in substantial part by persons residing in the area of the project.

(n) It will:

(1) To the greatest extent practicable under State law, comply with Sections 301 and 302 of Title III (Uniform Real Property Acquisition Policy) of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and will comply with Sections 303 and 304 of Title III, and HUD implementing instructions of 49 CFR Part 24;

(2) Inform affected persons of their rights and of the acquisition policies and procedures set forth in the regulations at 24 CFR Part 42, 570.488 and 570.606; and

(3) Adopt, make public and certify that it is following a Residential Anti-displacement and Relocation Assistance Plan as described in 24 CFR Part 570.488 and 570.606.

(o) It will:

(1) Comply with Title II (Uniform Relocation Assistance) of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR Part 24 and 24 CFR Part 570.488 and 570.606.

(2) Provide relocation payments and offer relocation assistance as described in Section 205 of the Uniform Relocation Assistance Act, as amended, and implementing instructions of 49 CFR Part 24 and 24 CFR Part 570.488 and 570.606 to all persons displaced as a result of acquisition of real property for an activity assisted under the Community Development Block Grant Program.

Such payments and assistance shall be provided in a fair and consistent manner that ensures that the relocation process does not result in different or separate treatment of such persons on account of race, color, religion, national origin, sex, or source of income;

(3) Assure that, within a reasonable period of time prior to displacement, comparable decent, safe and sanitary replacement dwellings will be available to all displaced families and individuals and that the range of choices available to such persons will not vary on account of their race, color, religion, national origin, sex, or source of income; and

(4) Inform affected persons of the relocation assistance, policies and procedures set forth in the regulations of 49 CFR Part 24 and 24 CFR Part 570.488 and 570.606.

(p) It will establish safeguards to prohibit employees from using positions for a purpose that is or gives the appearance of being motivated by a desire for private gain for themselves or others, particularly those with whom they have family, business, or other ties.

(q) It will comply with the provisions of the Hatch Act which limits the political activity of employees.

(r) It will give the State, HUD and the Comptroller General through any authorized representatives access to and the right to examine all records, books, papers, or documents related to the grant.

(s) It will ensure that the facilities under its ownership, lease or supervision which shall be utilized in the accomplishment of the program are not listed on the Environmental Protection Agency's (EPA) list of Violating Facilities and that it will notify the State and HUD of the receipt of any communication from the Director of the EPA Office of Federal Activities indicating that a facility to be used in the project is under consideration for listing by the EPA.

(t) It will comply with the flood insurance purchase requirement of Section 102(a) of the Flood Disaster Protection Act of 1973, P.L. 93-234, 87 Stat. 975, approved December 31, 1973. Section 102(a) required, on and after March 2, 1974, the purchase of flood insurance in communities where such insurance is available as a condition for the receipt of any Federal assistance for construction or acquisition purposes for use in any area that has been identified by the Federal Emergency Management Agency as an area having special flood hazards. The phrase "Federal financial assistance" includes any form of loan, grant, guaranty, insurance payment, rebate, subsidy, disaster assistance loan or grant, or any other form of direct or indirect Federal assistance.

(u) It will, in connection with its performance of environmental assessments under the National Environmental Policy Act of 1969, comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470), Executive Order 11593, and the Preservation of Archeological and Historical Data Act of 1966 (16 U.S.C. 469a-1, et seq.) by:

(1) Consulting with State Historic Preservation Officer to identify properties listed in or eligible for inclusion in the National Register of Historic Places that are subject to adverse effects (see 36 CFR Part 800.8) by the proposed activity; and

(2) Complying with all requirements established by the State and HUD to avoid or mitigate adverse effects upon such properties.

(v) It will comply with:

(1) The National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.) and 24 CFR Part 58;

(2) Executive Order 11988, Floodplain Management;

(3) Executive Order 11990, Protection of Wetlands;

(4) The Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.);

(5) The Fish and Wildlife Coordination Act of 1958, as amended (16 U.S.C. 661 et seq.);

(6) The Wild and Scenic Rivers Act of 1968, as amended (16 U.S.C. 1271);

(7) The Safe Drinking Water Act of 1974, as amended (42 U.S.C. 300(f) et seq.);

(8) Section 401(f) of the Lead-Based Paint Poisoning Prevention Act, as amended (42 U.S.C. 4831(b));

(9) The Clean Air Act of 1970, as amended (42 U.S.C. 7401 et seq.);

(10) The Federal Water Pollution Control Act of 1972, as amended (33 U.S.C. 1251 et seq.);

(11) The Clean Water Act of 1977 (P.L. 95-217); and

(12) The Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 (43 U.S.C. 6901 et seq.).

(w) It will comply with all parts of Title I of the Housing and Community Development Act of 1974, as amended, which have not been cited previously as well as with other applicable laws.

STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the State certifies that:

Affirmatively Further Fair Housing -- The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

2. Establishing an ongoing drug-free awareness program to inform employees about -

   (a) The dangers of drug abuse in the workplace;
   (b) The grantee's policy of maintaining a drug-free workplace;
   (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
   (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;

4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -

   (a) Abide by the terms of the statement; and
   (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -

   (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Anti-Lobbying -- To the best of the State's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of State -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Kevin Potter
Assistant Director

Signature/Authorized Official

5/7/12
Date

Title: Director, Ohio Department of Development

Specific CDBG Certifications

The State certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR §91.115 Citizen Participation Plan and each unit of general local government that receives assistance from the State is or will be following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.(a).

Consultation with Local Governments -- It has or will comply with the following:

1. It has consulted with affected units of local government in the non-entitlement area of the State in determining the method of distribution of funding;

2. It engages in or will engage in planning for community development activities;

3. It provides or will provide technical assistance to units of local government in connection with community development programs; and

4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

Local Needs Identification -- It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objectives of Title I of the Housing and Community Development Act of 1974, as amended. (See Section 106)

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);

2. Overall Benefit. The aggregate use of CDBG funds including Section 108 guaranteed loans during program year(s) 2012 and 2013. (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;

3. Special Assessments. The state will require units of general local government that receive CDBG funds to certify to the following:

It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Compliance with Laws -- It will comply with applicable laws.

Kevin Potter
Assistant Director

Signature/Authorized Official

5/7/12
Date

Title: Director, Ohio Department of Development

Specific HOME Certifications

The State certifies that:

Tenant Based Rental Assistance -- If it intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the State's consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Appropriate Financial Assistance -- Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

Kevin Potter
Assistant Director

Signature/Authorized Official

5/7/12
Date

Title: Director, Ohio Department of Development

ESG Certifications

Each State that seeks funding under the Emergency Solutions Grants Program must provide the following certifications:

Matching Funds – The State will obtain any matching amounts required under 24 CFR

576.201 in a manner so that its subrecipients that are least capable of providing matching amounts receive the benefit of the exception under 24 CFR 576.201(a)(2).

Discharge Policy – The State will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Confidentiality – The State will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

The State will ensure that its subrecipients comply with the following criteria:

Major rehabilitation/conversion – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – If ESG funds are used for shelter operations or essential services related to street outreach or emergency shelter, the subrecipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Homeless Persons Involvement – To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted ESG.

Consolidated Plan – All activities the subrecipient undertakes with assistance under ESG are consistent with the State's current HUD-approved consolidated plan.

Kevin Potter
Assistant Director

Signature/Authorized Official

5/7/12
Date

Title: Director, Ohio Department of Development

HOPWA Certifications

The State HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under the program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,

2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature/Authorized Official — Kevin Potter, Assistant Director — 5/7/12 Date

Title: Director, Ohio Department of Development

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.

2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.

3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.

4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).

5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).

6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)
77 South High Street
Columbus, Franklin County, Ohio 43215

Check ___ if there are workplaces on file that are not identified here. The certification with regard to the drug-free workplace required by 24 CFR part 24, subpart F.

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

- "Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C.812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

- "Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

- "Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

- "Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

FY 2013 Citizen Participation Plan (24 CFR Part 91.115)

(a)1. Applicability and Adoption of the Citizen Participation Plan

The Ohio Department of Development (ODOD) Community Development Division's Office of Community Development (OCD) is the State agency responsible for the administration of all of the programs funded through the U.S Department of Housing and Urban Development (HUD), including:

The Community Development Block Grant (CDBG) Program
The HOME Investment Partnerships Program
The Emergency Solutions Grant (ESG) Program
The Housing Opportunities for Persons With AIDS (HOPWA) Program

These four programs are required to be covered by a Consolidated Plan (including an Annual Action Plan and a five-year Strategic Plan), and the Citizen Participation requirements described at 24 CFR 91.115. This description of the state's Citizen Participation Plan for Program Year 2013, which will occur from July 1, 2013 through June 30, 2014, establishes the processes and procedures that will be followed to solicit citizen participation in the planning process. The planning process will take place during the year period, prior to the effective date of the FY 2013 Consolidated Plan (July 1, 2013).

(a)2. Encouragement of Citizen Participation

Because of the size and diversity of Ohio, OCD will provide opportunities for comment on the Consolidated Plan through a variety of strategies, as follows:

1. Notice of the availability of the FY 2011 Annual Performance Report will be sent to all Formula Allocation Program recipients, as well as FY 2013 non-profit grantees. This document will be made available on the OCD website at http://development.ohio.gov/Community/ohcp/WhatsNew.htm so that it can be referenced in local public hearings. Local communities receiving comments will be asked to forward any comments to OCD, which will provide these comments to the advisory committee members during the planning process.

2. A notice about the availability of the draft FY 2013 Ohio Consolidated Plan and Executive Summary and the notice of available auxiliary aids will be distributed to about 900 local communities and organizations for comment during the 30-day public comment period. The plan documents will be posted on the OCD website at http://development.ohio.gov/Community/ohcp/publications.htm with copies available upon request, as well as in the OCD office.

3. Each Formula Allocation Program and Community Housing Improvement Program (CHIP) grant recipient is required to follow a citizen participation process that involves holding a local public hearing on the availability of funding resources, development of a needs statement and must develop local plans to address identified needs, as discussed in paragraph (e) below. This mechanism will provide for local citizen involvement in the state's planning process.

(a)3. Citizen and Local Government Comment On The Citizen Participation Plan Amendments.

The FY 2013 Citizen Participation Plan and Amendment Policy will be made available for comment by local communities and the general public because it will be distributed with the FY 2013 Consolidated Plan (see (a)(2) above), during both the public comment period and after the plan is finally approved.

This will allow for comment on both the draft plan document and the proposed planning process for the following year.

(b) Development of the Consolidated Plan

The preparation of the Consolidated Plan will be the result of a process that will use an open consultation and citizen participation process that will involve internal work groups, external advisory committees, public hearings/meetings, publication of notices on the OCD website at http://development.ohio.gov/Community/ohcp/WhatsNew.htm, and consideration of written and oral comments. The overall process is described in detail below. (Note that specific dates cannot be given at this point, but will be identified prior to the public hearing and comment notification process.)

The first step in the planning process will be the preparation of the FY 2011 Consolidated Plan Annual Performance Report and the Performance Evaluation Report, a draft of which will be made available to the public for review and comment on September 2, 2013 (15 calendar days prior to its submission to the HUD area office on September 23, 2013). Notification of the availability of the Annual Report will be made through the notification of the Public Hearing on Needs.

On or about September 16, 2013 a Public Hearing on Needs Issues will be held with the location to be determined. Notification of the Public Hearing on Needs will be directly mailed to approximately 900 local communities, organizations and agencies throughout the state. The notification will also be published on OCD's website at http://development.ohio.gov/Community/ohcp/WhatsNew.htm. The notification will also summarize the state's planning process for the Consolidated Plan, and will solicit participation in OCD's Program Advisory Committee meetings. Comments made at the Public Hearing on Needs Issues will be distributed to the advisory committee members for their consideration during the planning process.

Additionally, throughout the year, OCD staff will meet with the State Programs Committee of the Ohio Conference of Community Development (OCCD), which convenes quarterly to discuss topics and issues related to community development. OCCD's membership includes many local community development agencies, as well as other organizations and people involved with housing and community development. OCD staff will also meet with other government agencies and organizations during FY 2013 to discuss various issues related to the Consolidated Plan. These meetings may well result in the identification of additional issues and recommendations that will also be included in the FY 2013 planning process.

On or about October 5 and 6, 2013, a series of meetings with each of 10 Program Advisory Committees will occur. The committees will consist of no less than 10 representatives of local governments, agencies, and organizations that have been involved with OCD and OHFA programs. Participation in the committee meetings will be open to the public, insofar as space is available, although OCD may specifically invite organizations and agencies to attend to ensure participation of a range of interests and perspectives is represented.

The Program Advisory Committee meetings will be held to discuss and receive input on how these programs are being administered at the State and local levels, how well the expenditure of funds is meeting identified needs of local communities, especially low- and moderate-income families and individuals, and ways to improve all areas of program administration and service delivery. After reviewing past program accomplishments, and current status, the advisory groups will make recommendations on FY 2013 programs, from application requirements and project review criteria, to training and technical assistance, funding levels and program guidelines and requirements. The 10 Program Advisory Committees are listed in the Advisory Committee Guidelines. Minutes of the Program Advisory Committees will be posted to OCD's website, maintained in the FY 2013 Consolidated Plan records, and copies of the minutes will be mailed to each of the respective Program Advisory Committees and the members of the Consolidated Plan Advisory Committee.

Based on the recommendations of the Program Advisory Committees and comments received by OCD, a draft FY 2013 Consolidated Plan will be prepared. The draft Plan will be considered at the Consolidated Plan Advisory Committee Meeting that will be held on or about February 2, 2013.

After revisions to the draft Plan are completed, it will be posted to the OCD website at http://development.ohio.gov/Community/ohcp/publications.htm along with the Executive Summary on or about March 1, 2013. Notification of the posting will be sent to approximately 900 local governments, agencies and organizations to provide them with an opportunity for review and comment. Hard copies of the plan will be provided upon request. The notification of the availability of the draft Consolidated Plan will mark the beginning of the 30-day public comment period, which will end on or about March 31, 2013. On or about March 16, 2013, approximately two weeks after the commencement of the 30-day public comment period, OCD will hold a Public Hearing on the draft FY 2013 Ohio Consolidated Plan. Both oral and written comments will be accepted at the hearing. The public hearing location is to be determined at a later date. Notification of the Public Comment period, Public Hearing and the availability of the FY 2013 draft plan will be accomplished through, direct mailing to local communities and organizations, and by posting on the OCD website at http://development.ohio.gov/Community/ohcp/publications.htm. After the Public Hearing and expiration of the comment process, OCD will consider any and all comments and recommendations, and make final revisions to the plan document. OCD will prepare responses to all comments submitted on the draft FY 2013 Consolidated Plan.

OCD will submit the Plan to the Governor's office for review and signature by the Governor, or a designated representative. The FY 2013 Consolidated Plan will then be submitted to the Columbus Area Office of the U.S. Department of Housing and Urban Development (HUD) on or about April 15, 2013 for the required 45-day review period. Upon approval of the Plan by HUD, the final FY 2012 Consolidated Plan and the Executive Summary will be posted on the OCD website at http://development.ohio.gov/Community/ohcp/publications.htm , and notification of such posting will be sent to approximately 900 local governments, organizations and individuals, and hardcopies made available to the general public upon request.

(c) Amendment Policy

Minor budgetary revisions to the Consolidated Plan, which are defined as changes that do not exceed 10% of the original budget amount, will not constitute a substantial amendment and will be made without a public hearing or notification. However, changes to existing method of distribution or program guidelines as stated in the plan document, new program initiatives, or budgetary changes in excess of 10% of the original budget amount will be considered a substantial amendment and will be required to go through a formal amendment process. OCD will hold a public hearing on such an amendment, and will provide notification of the proposed amendment not less than 30 calendar days prior to the public hearing. The notice will summarize the nature of the proposed amendment, the date, time and location of the public hearing, and procedures for submission of comments. The state may either make this notification by (1) publishing a notice in several newspapers of general circulation within the state, or (2) directly transmitting a notice to local governments, agencies or organizations affected by the amendment. In the event the latter method is chosen exclusively, local Formula grantees and/or local libraries will be requested to post notice of the proposed amendment. The notice will also be posted to OCD's website. Within 5 business days after the public hearing, OCD will determine whether to adopt the proposed amendment, adopt a revised version of the amendment or reject the amendment. The determination will be posted to the OCD website. If the amendment is adopted, the change will be incorporated into the Consolidated Plan, along with a summary of comments on the amendment and OCD's response to such comments.

(d) Performance Reports

The FY 2011 Performance Report will be prepared by OCD and made available for public comment and review 15 days prior to submission to HUD, which must occur no later than 90 days after the end of the state's 2011 Program Year, which will occur on June 30, 2013. The notification and hearing process is described under section (b) above.

(e) Citizen Participation Requirements For Local Governments

Units of general local government that receive CDBG funds from the state must adopt and follow a written local citizen participation plan which:

(a) provides for and encourages citizen participation, with particular emphasis on participation by persons of low- and moderate-income who are residents of slum and blighted areas and of areas in which Section 106 funds are proposed to be used, and in the case of a grantee described in Section 106(a), provides for participation of residents in low-and moderate-income neighborhoods as defined by the local jurisdiction;

(b) provides citizens with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds, as required by regulations of the Secretary, and relating to the actual funds under this title; provides citizens with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use;

(c) provides for technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals with the level and type of assistance to be determined by the grantee;

(d) provides for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least the development of needs, the review of proposed activities, and review of program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the disabled;

(e) provides for a timely written answer to written complaints and grievances, within 15 working days where practicable; and,

(f) identifies how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate. This paragraph may not be construed to restrict the responsibility or authority of the grantee for the development and execution of its community development program.

(f) Availability to the Public

Upon HUD approval, the FY 2012 Consolidated Plan, substantial amendments and the FY 2013 Consolidated Plan and 2011 Annual Performance Report will be available to the public upon request throughout FY 2013 and FY 2014. Copies of the Consolidated Plan will remain on OCD's website for both the current and previous years. Request for copies of these documents may be made by phone, through FAX or in writing to:

Office of Community Development
Riffe Center, 25th floor
77 South High Street
Columbus, Ohio 43215
Phone: (614) 466-2285
Fax: (614) 752-4575

(g) Access to Records

OCD will provide citizens, public agencies and other interested parties with reasonable and timely written access to information and records relating to the state's Consolidated Plan and the state's use of this assistance under the programs covered by this Citizen Participation Plan during the preceding five years. Records pertaining to projects funded within the previous five years can be made available within 24-hours of written notice specifying which records for which access is being requested. Such notification must be sent to:

Office Chief
Office of Community Development
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(h) Comments and Complaints

The FY 2013 Consolidated Plan will include a summary of comments or views made in conjunction with the Consolidated Plan or process, the amendment of the Plan, or the Annual Report, as received by OCD in writing or orally at public hearings or during public comment periods during the planning process.

OCD will respond to written complaints within 15 working days of the receipt of such a complaint if the complaint is made in conjunction with programs covered by this Citizen Participation Plan.

If the state receives a written complaint that is made about a program or project that is administered by a sub-grantee community, OCD will refer the complaint to the local grantee community along with a transmittal letter from OCD, copied to the complainant. The local grantee community will be required to respond to the complainant in writing (with a copy of the response sent to OCD) within 15 days of the date of OCD's transmittal letter. OCD will work with the community and the complainant to ensure that the issue is resolved to the mutual satisfaction of the parties involved, and that applicable program regulations are followed.

(i) Use of Citizen Participation Plan

The state shall follow and document compliance with this Citizen Participation Plan.

(j) 2010-2014 Consolidated Plan Needs Assessment and Strategy

The FY 2010 – 2014 Consolidated Plan Needs Assessment and Strategy was approved by HUD Ohio in August of 2010. The state is required to submit statistical and analytical information that provides an overall picture of the housing, homeless, and community development needs of the state. The information will assist in establishing priorities and allocating Federal and State resources, principally for extremely low-, low-, and moderate-income families. The information will also be used for developing specific objectives in accordance with the statutory goals of providing decent housing, a suitable living environment, and expanding economic opportunities. The needs information must be sufficient to support the state's strategic plan, including its priorities for allocating resources, its specific objectives and its strategy for achieving desired results.

The state drew on relevant information from previous submissions and other reports and studies, as appropriate. The process also relied on citizen input, as well as the results of consultations with local governments, state and federal government agencies, non-profit organizations, and social service agencies to obtain information on housing needs and other needs of children, elderly persons, persons with disabilities, homeless persons, and other persons served by such agencies.

The state produced a strategic plan that brought the needs and resources together in a coordinated housing and community development strategy. The strategic plan identified expected accomplishments and results the state hopes to achieve in terms of outputs and outcomes. The state plan was developed to achieve the following goals and objectives, principally for low- very low-, and extremely low-income residents:

- provide decent housing,
- create suitable living environments, and
- expand economic opportunities

The Annual Consolidated Action Plan citizen participation and planning process was used to solicit comments and input on the development of the needs assessment and strategy, however special meetings took place in order to deal with specific topics and issues. An e-committee was established to gather input obtained through surveys and use of electronic media and communication. The final version of the FY 2010 – 2014 Consolidated Plan Needs Assessment and Strategy is available on the OCD website at http://www.development.ohio.gov/Community/ohcp/publications.htm.

OCD Consolidated Plan Advisory Committee Guidelines

The following guidelines will pertain to the composition and function of the advisory committees that are established in conjunction with the preparation of the Consolidated Plan.

1. OCD will annually establish a total of 10 Program Advisory Committees as follows:

   Community Development Program Advisory Committee
   Comprehensive Downtown Revitalization Program Advisory Committee
   Water and Sanitary Sewer Program Advisory Committee
   Economic Development Program Advisory Committee
   Community Housing Improvement Program Advisory Committee
   Housing Development Assistance Program Advisory Committee
   New Horizons/Fair Housing Program Advisory Committee
   Homeless Crisis Response Program /Housing Assistance Grant Program Advisory Committee
   Housing Opportunities for Persons With AIDS Program Advisory Committee
   Microenterprise Business Development Program Advisory Committee

   Each committee will consist of at least 10 members, selected by OCD.

   Committee members must give OCD at least 24 hours notice if they will be unable to attend a planned meeting for which their attendance was previously confirmed. In the event a member is absent from meeting and has not provided notification, OCD may replace that committee member.

2. OCD will annually establish a Consolidated Plan Advisory Committee, comprised of approximately 28 members, representing the following areas:

County Commissioners Association	2 members
Ohio Municipal League	2 members
Ohio Township Association	1 member
Ohio Conference of Community Development	2 members
Heritage Ohio	1 member
Corporation for Ohio Appalachian Development (COAD)	1 member
Ohio Association of Community Action Agencies	1 member
Ohio Development Association	1 member
Ohio Housing Finance Agency (OHFA)	1 member
Builders/Developers/Realtors	1 member*
Non-Profit Organizations	4 members*
Ohio Civil Rights Commission	1 member
Coalition on Homelessness and Housing in Ohio (COHHIO)	1 member
Ohio Housing Authorities Conference	1 member
USDA Rural Development Office	1 member
Local Development District or Governor's Office of Appalachia	1 member
Ohio Community Development Corporation Association	1 member
Ohio Disabilities Planning Council	1 member
Private Lending Community	1 member*
Ohio Rural Development Partnership	1 member
Ohio Department of Health	1 member
U.S. Dept. of HUD	1 member

*These members are limited to a two-year maximum term.

OCD reserves the right to include representatives of other groups or to select alternative members if those initially selected are unable to attend the committee meetings or participate in the planning process.

Responses to Comments on the FY 2012 Consolidated Plan

The Office of Community Development received a number of comments during the 30 day public comment period that began on March 1, 2012, as well as the March 22, 2012 Public Hearing. Below are the summaries of the comments received along with the corresponding responses prepared by the Office of Community Development (OCD) and the Ohio Housing Finance Agency (OHFA) concerning the Draft FY 2012 Ohio Consolidated Plan.

Comment:

There is a need to update the current QAP rating structure to incorporate a number of performance measurements, with the following metrics being recommended: Stability Measure; Short-Term/Interim Stability Percent; Occupancy Rate, and Success Rate.

Response:

OHFA is currently developing the 2013 QAP and will consider your input during this process. A draft of the 2013 QAP is planned for release at the end of May 2012, and the OHFA Board will be asked to approve the final version at its July 18, 2012 meeting. Further questions or comments regarding the 2013 QAP may be addressed directly to our planning staff through electronic mail (2013QAPMailbox@ohiohome.org) to ensure your thoughts and suggestions are properly weighed and considered alongside others.

Comment:

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

Response:

OCD will evaluate the need for the development of new training materials and revisions to existing training materials during the 2012 calendar year. A session on Economic Development Program Income is schedule for the 2012 Community Development Conference, which will take place from November 7-9, 2012. OCD will consider developing a Housing Program Income Handbook and providing training on Program Income regulations.

Comment:

A comment was received that requested the Community Housing Improvement Program (CHIP) CDBG budget be increased to $23,628,000

Response:

Thank you for your comment.

Comment:

A comment was received that requested that OCD allow grantees to use any and all forms of the financing mechanisms permitted under the CDBG and HOME federal regulations.

Response:

Finance Mechanisms for CHIP-funded projects are not specifically addressed in the State of Ohio Consolidated Plan, but is instead a program policy issue. Since it's issuance in 2009, the policy addressing finance mechanisms has been widely reviewed by OCD. While the fundamentals of the finance mechanism policy will not be changed, OCD is currently preparing an updated policy that will provide greater clarification to *Policy Notice 09-03: Finance Mechanisms for CHIP-Funded Projects*.

Comment:

A comment was received that requested the CHIP grant ceiling be raised from $500,000 to $800,000.

Response:

Thank you for your comment.

Comment:

A comment was received that requested the Homelessness Prevention (aka Emergency Monthly Housing Payments) and the Tenant-Based Rental Assistance (TBRA) activities be eliminated as eligible CHIP-funded activities.

Response:

The Emergency Monthly Housing Payment (EMHP) activity and the Tenant-Based Rental Assistance (TBRA) activity are widely used throughout the State of Ohio. However, communities are not required to apply for these activities. OCD wants to give flexibility to every community to choose the activities they feel are most needed, including EMHP and TBRA. For FY 2010 and FY 2011, OCD awarded total TBRA funds of $2,802,100 to assist 557 tenant households, and awarded total EMHP funds of $2,228,000 to prevent 1,077 households from becoming homeless. The comment offers no justification for the elimination of these two activities. Previous funding rounds demonstrate these two activities provide a necessary service to the LMI population of Ohio, and will continue to offer these activities through the CHIP.

Comment:

A comment was received that requested the funding limit for the Home Repair activity be increased to $200,000.

Response:

Currently, OCD limits the amount of Home Repair funds that can be requested in a single application to $125,000. Because this activity can only be funded by CDBG and OHTF funds, OCD will not increase the maximum allowable Home Repair request.

Comment:

A comment was received that requested the application timing be delayed from April 2, 2012 until June 22, 2012.

Response:

The FY 2012 CHIP application submission deadline of April 2, 2012 has been set and was announced at the January 2012 application training. This date will not be changed.

Comment:

A comment was received that requested the Community Housing Improvement Strategy (CHIS) requirement be eliminated.

Response:

Beginning in 2014, OCD will require each community applying for OCD funding to have a comprehensive planning document. Instructions for this document are being established at this time. Until then, new communities wishing to apply for CHIP funds must submit a CHIS to OCD. In 2008, OCD eliminated the requirement of submitting updates to all communities' existing Community Housing Improvement Strategy (CHIS).

Comment:

A comment was received that requested for the HOME-funded TBRA activity that the area median income limit of 50% be increased to the HOME federal limit of 60%.

Response:

OCD will consider this suggestion for inclusion in the update of the OCD Housing Handbook.

Comment:

A comment was received that proposed the rating criteria be revised as follows: Elimination of Planning points (currently at 10 points), Cost Effectiveness points be increased from 5 points to 10 points, and Leverage and Coordination points be increased from 5 points to 10 points.

Response:

It has been determined that the CHIP application planning process is important in defining a community's greatest housing needs. OCD ensures completion of the process by reviewing it as part of each community's application for CHIP funding. Regarding the proposed increase to the points associated with Cost Effectiveness, simply submitting an activity budget that falls within acceptable dollar ranges does not warrant 10 points. Additionally, increasing the Leverage and Coordination points from 5 to 10 would give an unfair advantage to larger CHIP communities with more funds available to them. The majority of small cities and rural counties struggle to come up with a 12.5% match of other funds in order to receive the full 5 Leverage and Coordination points. The comment offers no justification for changes to these point values, and they will remain at their current levels.

Comment:

The Office of Community Development should continue to support and fund the Formula allocation. The Formula allocation allows Community Development Offices to budget and retain at least a minimal "in house" staff so as to have administrative capacity not only to carry out the Formula Program, but to apply for, carry out and close out competitive grants. The Formula also allows communities to target needs best as they see fit.

Response:

OCD will continue to provide funding for the Formula Allocation Program in FY 2012. Approximately $16.4 million will be distributed to 79 counties and 51 cities based on a formula that divides the number of low- and moderate-income (LMI) persons residing in the community by the number of LMI persons residing in the non-entitlement areas of the state multiplied by the amount of CDBG Program funds allocated to the Formula Allocation Program. The program provides communities with a flexible housing and community development resource that can be used to address locally identified needs. A maximum of 15 percent of each grant award may be expended for administration.

Comment:

A request to suspend the Community Development Program CDBG funding for FY 2012, with the exception of the Neighborhood Revitalization Grants Program was received.

Response:

OCD will not suspend the Formula Allocation Program for FY 2012. The program structure will be re-evaluated for the FY 2013 program year. OCD has set-aside $2.1 million for continued funding of Neighborhood Revitalization Program in FY 2012.

Comment:

Removal of the Revolving Loan Fund Participation requirement.

Response:

The Department of Housing and Community Development (HUD), which is the funding source for the Community Development Block Grant (CDBG) Program, requires communities to substantially disburse any existing program income balance in conjunction with or prior to application for additional CDBG funds. To comply with HUD regulations, OCD includes this language in the Consolidated Plan and makes decisions regarding new grant awards in accordance.

Comment:

Revise the Number of Projects requirement based on the “Formula Allocation.”

Response:

OCD considered restricting the number of projects allowed per year based on both the amount of grant award and also the city or county designation. The decision was made to continue to tie the number of projects allowed to the city or county designation, but also to reduce the number of projects allowed for each jurisdiction. This will be re-evaluated for FY 2013.

Comment:

Increase the Administrative Costs maximum of the Economic Development Loan Program grant request, as well as removal of “Applicants requesting substantially less than the full amount allowed will receive special consideration.”

Response:

The Department of Housing and Community Development (HUD) caps funding for administration at 20 percent of the total program budget. The Office of Community Development further limits the administration allowance for the Economic Development Loan and Public Infrastructure Grant at $10,000. Due to the duration of the grant and regulatory requirements, OCD has determined that $10,000 is sufficient for the administration of most projects. Additionally, communities may use Economic Development Revolving Loan Fund (RLF) funds to supplement the cost of grant administration, if necessary.

Comment:

Removal of the “Drawdown Procedure” requirement.

Response:

CDBG Economic Development Loan and Public Infrastructure Grant dollars are awarded as gap financing for projects that cannot go forward without CDBG assistance. Private, for-profit businesses are required to commit cash equity, which must be expended prior to public participation. The amount of CDBG assistance required to fill the gap is determined through the application review process. If there is a cost savings, CDBG participation must be pro-rated so that the project is not over-subsidized. Waivers to this policy for exceptional cases and with prior written approval are already permitted.

Comment:

OCD received a comment requesting that the definitions of “area” and “poor” be provided.

Response:

“Area” has been redefined as Census Tract and/or Block Group. “Poor” has been redefined as Low- and Moderate-Income.

Comment:

A request to clarify Off-Site Infrastructure Activities section of the Residential Public Infrastructure Grant Program was received.

Response:

The language in the Consolidated Plan accurately reflects the program requirements as written.

Comment:

Increase the grant ceiling of the Residential Public Infrastructure Grant Program.

Response:
The grant ceiling was increased from $500,000 to $600,000 for construction activities in FY 2011. In prior years, $500,000 was the maximum award for construction activities, and an additional $100,000 could only be requested if the project included household connections. With the reduction in the availability of funding for FY 2012, OCD will not increase the grant ceiling again in FY 2012.

Comment:

A number of communities and organizations have expressed support for the Comprehensive Downtown Revitalization Grant Program for FY 2012. The written and oral comments received discuss how the Comprehensive Downtown Revitalization Grant Program assists in central business districts revitalization efforts, as well as improves the local economy.

Response:

OCD suspended both the Downtown Planning Grant Program and Comprehensive Downtown Building Rehabilitation and Streetscape Revitalization Program due to a lack of funding for FY 2012. OCD is still committed to assisting with downtown revitalization activities. Communities can apply for Community Development Program funds to complete infrastructure improvements in their central business districts. Community Development Program funds can also be used for downtown façade improvements and code violation corrections. Additional funds were allocated for Discretionary "Targets of Opportunity" projects designed to rehabilitate single buildings or multiple buildings in concentrated areas within the central business district. Additionally, downtown projects that will result in private investment and create/retain low- and moderate-income (LMI) jobs may qualify for assistance through the Economic Development Loan Program.

Comment:

A comment has been received that supports the one year suspension of the Comprehensive Downtown Revitalization Grant Program due to insufficient funds. Cities have the option of using Formula funds Downtown. If, however, few communities actually apply to do any downtown activities across the state, this should be seriously reevaluated for FY 2013.

Response:

OCD will re-evaluate the allocation of Community Development Block Grant (CDBG) funds for FY 2013.

Comment:

Conduct a Program Application and Implementation training for the Economic Development Loan Program and for the Economic Development Public Infrastructure Grant Program

Response:

OCD will hold a Community Development Conference from November 7-9, 2012. Training on both the Community Development Block Grant (CDBG) Economic Development and Revolving Loan Fund programs is proposed.

Comment:

A comment has been received that recommends an increase to the threshold requirement of families and individuals have to be at 30% of Area Median Income. Housing crisis isn't necessarily tied to income limits and by imposing these limits OCD will prevent shelters from serving the target population.

Response:

ODOD is unable to adjust the Area Median Income limit, as it is set by HUD through the HEARTH regulations. However, income requirements do not apply to emergency shelter eligibility. The below 30% AMI requirement applies

only to the homelessness prevention activity at entry and re-housing activities verified 90 days after the first issuance of re-housing assistance for each client.

Comment:

A comment has been received that requests that the Shelter Diversion component of the Homeless Crisis Response Program takes into consideration the root causes of homelessness.

Response:

ODOD acknowledges the multi-faceted nature of homelessness and the many factors that may contribute to an individual of family presenting at an emergency shelter. Shelter diversion planning is a tool by which emergency shelter providers can assess the resources each client brings with them to determine if any alternative to emergency shelter stay exists, even temporarily, while more stable housing is secured. Diversion planning in no way restricts shelters from serving clients for whom no safe, reasonable alternative exists.

Comment:

Request to define “shelter diversion activities” within the Homelessness Prevention section more broadly to consider the diversion activities provided by community Coordinated Point of Access as eligible activities under the Homeless Prevention program and for the minimum assistance criteria to be waived for these types of programs.

Response:

Shelter diversion activities included in a coordinated point of access system would be considered case management services and would be funded through program dollars in this way to the extent allowable by HUD.

Comment:

Revise the Rapid Re-Housing 30% Area Median Income Limits threshold requirement to 50% Area Median Income.

Response:

ODOD is unable to change the Area Median Income requirements, as these are established by federal statute.

Comment:

Describe what is understood under the “explain how its centralized intake/single point of entry process meets the requirements set forth in the plan content.” Requesting that OCD removes this requirement for entitlement communities that already have a coordinated access point for individuals and replace it with a requirement to describe the current structure of the local coordinated access point for individuals in crisis.

Response:

ODOD is unable to completely remove the requirement for a regional plan from entitlement communities, as ODOD is using these plans to satisfy HUD requirements for use of Emergency Solutions Grant funds. ODOD has adjusted the requirement for entitlements to allow for submission of a summary of how the current consolidated/coordinated point of entry process in the community satisfies the basic requirements of the regional plan guidance listed in the 2012 Consolidated Plan.

Comment:

A number of communities have expressed concern with the creation of the regions and have also expressed interest in the being the lead agency.

Response:

Creation of regions and State appointment of lead grantees for each region is a process outside that of the Consolidated Plan. Announcements will be made regarding lead grantees in mid-April 2012.

Comment:

Concern has been expressed with regards to making an application to a regional panel before sending it to the state.

Response:

ODOD regions will not restrict currently existing regional networks from continuing regional work. In fact, ODOD encourages both currently existing regional networks and local Continuums of Care to continue meeting and collaborating, as both contribute to the long-term improvement and success of homeless programs in the state.

Comment:

A comment was received that supports the Monitoring Standards as set forth by OCD, but would like to require that grantees respond with a future plan of action for cited advisory concerns.

Response:

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

Comment:

A comment was received that discussed the composition of the Consolidated Plan Advisory Committee.

Response:

The Ohio Consolidated Plan Advisory Committee is comprised of a number of members representing non-profit organizations, the private and public sector, as well as local communities. There are a number of “at large” members selected by OHFA and OCD that are limited to a two-year maximum term. These “at large” members represent the private lending community, non-profit organizations and builder, developers and realtors.

Comment:

A comment was received that supports OCD’s CDBG Planning Work Groups and would like to incorporate these meetings into the FY 2013 Consolidated Plan planning process.

Response:

The CDBG Planning Work Group initiative will supplement, not replace, the regular FY 2013 Consolidated Plan Citizen Participation Process.

Acronym Listing

ARC	Appalachia Regional Commission
CDBG	Community Development Block Grant Program
CDC	Community Development Corporation
CSD	Community Services Division
CDFF	Community Development Finance Fund
CHDO	Community Housing Development Organization
CHIP	Community Housing Improvement Program
COAD	Corporation for Ohio Appalachian Development
COHHIO	Coalition on Homelessness and Housing in Ohio
ESG	Emergency Solutions Grant Program
FEMA	Federal Emergency Management Agency
FFY	Federal Fiscal Year
412	Business Development Account (412), SBID, Ohio Department of Development
GOA	Governor's Office of Appalachia
HOPWA	Housing Opportunities for Persons With AIDS (HOPWA)
HOME	HOME Investment Partnerships Program
HUD	U.S. Department of Housing and Urban Development
LIHTC	Low-Income Housing Tax Credit
LMI	Low- and Moderate-Income
OCS	Office of Community Services, Ohio Department of Development
ODA	Ohio Department of Aging
ODE	Ohio Department of Education
ODMH	Ohio Department of Mental Health
ODJFS	Ohio Department of Job and Family Services
ODODD	Ohio Department of Developmental Disabilities
ODNR	Ohio Department of Natural Resources
ODOD	Ohio Department of Development
ODOT	Ohio Department of Transportation
OEO	Ohio Energy Resource Division, Ohio Department of Development
OEPA	Ohio Environmental Protection Agency
OCD	Office of Community Development
OHFA	Ohio Housing Finance Agency

OHTF	Ohio Housing Trust Fund
OITP	Ohio Investment Training Program, Workforce Talent Division, Ohio Department of Development
OSDC	Ohio Statewide Development Corporation
166	166 Loan Program, Strategic Business Investment Division, Ohio Department of Development
OPWC	Ohio Public Works Commission
OWDA	Ohio Water Development Authority
PATH	Projects for Assistance in Transition From Homelessness (ODMH)
PJ	Participating Jurisdiction (HOME Program)
PY	Program Year
RDA	Rural Development Administration
RLF	Economic Development Revolving Loan Fund
SAFAH	Supplemental Assistance for Facilities to Assist the Homeless
629	Roadwork Development Account (629), Strategic Business Investment Division, Ohio Department of Development
SBA-504	Small Business Administration, 504 Loan Program
SBA-7A	Small Business Administration, 7(A) Loan Guaranty Program
SFY	State Fiscal Year