



**Department of
Development**

Office of Community Development

Fiscal Year 2012 Ohio Consolidated Plan Executive Summary

May 2012

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

Introduction

This Executive Summary is being provided pursuant to the March 13, 2006 revisions to the HUD Consolidated Plan regulations. Those regulations require that an Executive Summary be prepared, which must include:

- A summary of the citizen participation and consultation process (pages 1-2).
- Objectives and outcomes and an evaluation of past performance (pages 11-22)
- Summary of comments on the plan and responses to comments (pages 23-29)

A summary of the proposed revisions for the 2012 plan are on pages 3-9, as well as, a budget table for the Draft FY 2012 Ohio Consolidated Plan on page 10. The amount of the HUD funds listed in the budget table are based on FY 2012 HUD Estimated Allocations as the final FY 2012 allocations were not released in time for the FY 2012 Consolidated Plan submittal, OHTF funding allocations have not yet been determined by the Ohio Housing Trust Fund Advisory Committee. Information on the State's past performance includes a listing of each program's goals and objectives, as well as performance measures and performance indicators for each objective. Please note that the 2011 programs will not be fully implemented until June 30, 2012. Therefore, the most current summary data addressing past performance is for the 2010 program year. Much more detailed information about the 2010 programs and activities is available in the Fiscal Year 2010 Consolidated Plan Annual Performance and Evaluation Report, which is required to report on the progress that the state has made in carrying out its Strategic Plan and its Action Plan. The report covers the Community Development Block Grant (CDBG) Program, the HOME Investment Partnerships (HOME) Program, the Emergency Solutions Grant (ESG) Program and the Housing Opportunities for Persons With AIDS (HOPWA) Program. Copies of the FY 2010 Annual Performance Report (APR) may be obtained from OCD upon request, please call (614) 466-2285 or stop by the OCD office, which is located at 77 South High Street, 25th floor, Columbus, Ohio 43215. The FY 2010 APR is also posted on the web at: <http://development.ohio.gov/cdd/ohcp/publications.htm>.

FY 2012 Citizen Participation and Consultation Process

OCD carried out a number of activities designed to obtain comments, perspectives, and opinions from citizens during the preparation of the FY 2012 Ohio Consolidated Plan. Notification of all public hearings and meetings was made at least 10 days in advance of the meetings through direct mail and through the posting on the OCD website. Records of these actions and documentation are available for review during regular business hours at the OCD office, located at 77 South High Street, 25th floor, Columbus, Ohio 43215. The specific steps in the citizen participation process are described below in sections 1-4.

1. Public Hearing On Needs

OCD held a public hearing on needs issues on September 14, 2011 in Room 1932 on the 19th Floor of the Riffe Center located at 77 South High Street, in Columbus.

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 organizations and persons on the OCD mailing list, which includes approximately 900 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
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 Assistance Grant Program /Housing Assistance Grant Program Advisory Committee
Housing Opportunities for Persons With AIDS Program Advisory Committee
Microenterprise Business Development Program Advisory Committee

3. Consolidated Plan Program Advisory Committee Meeting

The FY 2012 Ohio Consolidated Plan Advisory Committee will meet on February 23, 2012 to review the Draft FY 2012 Ohio Consolidated Plan. The Ohio Consolidated Plan Advisory Committee is comprised of over 20 persons who represent a variety of public and private organizations that are involved with programs and issues related to housing and community development.

4. Notification of Public Comment Period and Distribution of Plan

On March 1, 2012, notification was sent to approximately 900 communities, agencies and organizations, informing them that the Draft FY 2012 Ohio Consolidated Plan and Executive Summary will be posted on OCD's website at <http://development.ohio.gov/Community/ohcp/publications.htm> for review and comment. This notification will also announce the beginning of the mandatory 30-day public comment period on the draft plan, which includes a public hearing on March 22, 2012 in Room 1952 on the 19th Floor of the Riffe Center located at 77 South High Street in Columbus, Ohio at 1:30 p.m.

Submission to HUD

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

FISCAL YEAR 2012 OHIO CONSOLIDATED PLAN

Summary of Proposed Revisions

Introduction

The Ohio Department of Development's (ODOD's) Office of Community Development (OCD) annually receives funding from the U.S. Department of Housing and Urban Development (HUD) from four programs: the Community Development Block Grant (CDBG) Program, the HOME Investment Partnerships Program, the Emergency Solutions Grant (ESG) Program, and the Housing Opportunities for Persons With AIDS (HOPWA) Program. Prior to receiving and distributing these funds, Ohio must first prepare an annual Consolidated Plan, in accordance with the requirement at 24 CFR Part 91 Subpart D, Sections 91.300 – 91.330. HUD regulations require that, in preparing the annual plan, the state must develop and follow a planning process that incorporates a citizen participation plan. The plan must include a method of distribution, as well as a description of other actions that will be undertaken in support of the state's proposed programs and activities.

The revisions that are proposed in the FY 2012 Ohio Consolidated Plan are summarized below. Only significant program revisions are listed, not minor revisions, such as application due dates.

Community Housing Improvement Program (CHIP)

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

Grant Ceiling:

- The Habitat for Humanity Supplemental funds of up to \$50,000 in HOME funding per eligible applicant have been suspended for FY 2012.

Eligible Jurisdictions:

- The list of eligible CHIP communities in Table 8 has been updated according to the Ohio Secretary of States reclassification of all municipalities and villages.
- The municipality of Waterville in Lucas County is now eligible and has been included in Table 8. The following municipalities are no longer eligible and have been removed from Table 8: Carlisle; Crestline; East Palestine; Greenfield; New Lexington; Newton Falls; and Waverly.

Eligible Activities:

- Soft costs can now be charged in conjunction with the Emergency Monthly Housing Payment activity.

Rating Criteria:

- The application rating criteria under the Needs and Capacity Categories has been changed. Community Distress will be reduced to 10 (ten) points from 15 (fifteen) within the Needs Category. Administrative Capacity will increase to 30 (thirty) points from 25 (twenty-five).

CHIP Amendment/Extension Policy

- The statement "90% of outcomes must be met for an activity prior to requesting an amendment to decrease the budget for that activity" has been removed.

Housing Development Assistance Program (HDAP)

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

Rehabilitation Standards:

- Language had been added to allow for other standards agreed upon by OHFA and OCD to be used as reference.

Rental Developments (including Preservation Developments) - Loans:

- A negotiated rate is to be used that must be agreed upon by OHFA and the project ownership based on the project's cash flow.
- Payments will be based on a percentage of the projects cash flow rather than 50% of the projects cash flow that exceeds a \$10,000 threshold.
- Language that pertains to the first 10 years following the project's certification, as well as, after the ten year period has been removed.

Transitional Housing:

- The applicant must now designate a minimum occupancy period for residents as opposed to what was previously stated as a maximum occupancy period for residents.

Programs: Homeownership. A. Housing Development Gap Financing (HDGF) - Homeownership

Eligible Applicants:

- For profit developers has been removed from the list of eligible applicants.

Development Design Requirements:

- 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 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.

Housing Credit Gap Financing

Tie Breaker:

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

Application Submission:

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

Community Housing Development Organization (CHDO) Operating Grant Program

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

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.

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.

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.

Homeless Crisis Response Program

Through the restructuring of the Housing Assistance Grant Program and the Homeless Prevention and Rapid Rehousing Program, two new programs (Homeless Crisis Response Program and the Supportive Housing Program) have been created to better meet national objectives and the needs of Ohio's homeless. The following lists all of the significant programmatic changes that will be included in the 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.

Eligible Applicants:

- 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).
- More detailed guidance on development of regional plans is included in the Consolidated Plan on page 114.

Funding Method:

- Emergency shelter funding is awarded on a renewal basis, assuming grantees ability to meet performance standards;
- Shelter diversion funds are distributed by a baseline formula allocation to ensure at least minimal access to assistance statewide, with additional funding available through competitive bonus;
- Shelter diversion funds are awarded on a regional basis, requiring collaboration of all providers within the region to develop a single shelter diversion strategy, moving individual programs toward systems-level coordination.

Eligible Activities:

- Two eligible activity categories: a) Emergency Shelter Operations and Services and b) Shelter Diversion and Rehousing, which includes both homelessness prevention and rapid rehousing activities;

Threshold Requirements:

- Proposals for emergency shelter activity funds must be included in the regional shelter diversion 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.

- Funds for these activities must be targeted to individuals and families who are below 30 percent of Area Median Income (AMI)

Rating Criteria:

- Applications are rated on the following six criteria with the total points available for each item included: Proposal Content (25 points); Outcomes (30 points); Collaboration (10 points); Targeting and Need (10 points); Capacity (10 points); and HMIS Data Quality (10 points).

Supportive Housing Program

Through the restructuring of the Housing Assistance Grant Program and the Homeless Prevention and Rapid Rehousing Program, two new programs (Homeless Crisis Response Program and the Supportive Housing Program) have been created to better meet national objectives and the needs of Ohio's homeless. The following lists all of the significant programmatic changes that will be included in the 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.

Funding Method:

- Provides funding for operations (and limited funding for services) in permanent supportive housing and facility-based transitional housing programs; and
- Funding awarded on a renewal basis, assuming grantees ability to meet performance standards, due to the need for funding stability in the medium to long-term nature of program models.

Eligible Activities:

- 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.

Rating Criteria:

- Applications are rated on the following six criteria with the total points available for each item included: Proposal Content (25 points); Outcomes (30 points); Collaboration (10 points); Targeting and Need (10 points); Capacity (10 points); and HMIS Data Quality (10 points).

Housing Assistance Grant Program

There are no changes being proposed for FY 2012.

Housing Opportunities for Persons With AIDS Program

There are no changes being proposed for FY 2012.

Community Development Program

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

Formula

Community Assessment and Strategy:

- Removal of “ten-year” and renaming Community Development Strategy to Community Development Targeting Strategy.

Number of Projects:

- The maximum number of allowable projects has been decreased for Counties from 6 to 4 and for Cities from 3 to 2. The rationale is to encourage communities to fund projects that will result in greater community impact and be more targeted in allocating resources, especially in light of reduced allocations.
- Added language to allow waiver requests for number of projects to provide flexibility in situations that warrant it.

Program Amendments:

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

Neighborhood Revitalization Grants

Ineligible Activities:

- Removed language referencing Comprehensive Downtown Revitalization Program, which has been suspended for FY 2012.

Number of Investment Areas:

- Added language to clarify the relationship between the CAS and eligible investment areas. Rationale: There has been a lot of confusion in the defining application investment areas, which has led to ineligible application submissions.

Economic Development Loan and Infrastructure Grant Program

The Economic Development Program and the Water and Sanitary Sewer Program have been restructured to form the Economic Development Loan and Infrastructure Grant Program that includes the Economic Development Loan Program, the Economic Development Public Infrastructure Grant Program and the Residential Public Infrastructure Grant Program. Proposed program changes that correspond to each restructured program of the Economic Development Loan and Infrastructure Grant Program are listed below:

Economic Development Loan Program

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:

- Off-site activities are not included as an eligible activity.

Economic Development Public Infrastructure Grant Program

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 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 will 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.

Off-Site Infrastructure Activities:

- 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.

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.

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.

Comprehensive Downtown Revitalization Program

Proposed program changes that correspond to each category of the Comprehensive Downtown Revitalization Program section are listed below:

Total Funds:

- The Comprehensive Downtown Revitalization 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.

Purpose and Programmatic Design:

- The “tier” language has been removed that was used to describe the 3 categories of Comprehensive Downtown Revitalization Program funding.

Community Development Corporation (CDC) Microenterprise Business Development Program

There are no changes being proposed for FY 2012.

Discretionary Grant Programs

Proposed program changes that correspond to each program of the Comprehensive Downtown Revitalization Program section are listed below:

Economic and Community Development:

Total Funds:

- 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.

New Horizons Fair Housing Assistance Program

There are no changes being proposed for FY 2012.

Table 1: 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	2	3	4	5
					Federal	Federal	Federal	Federal	State
					CDBG	HOME	ESG	HOPWA	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.

Program Goals, Objectives, Performance Measures and Indicators

This section provides information on performance measures that were developed as part of the 2010 Consolidated Plan and 2010-2014 Consolidated Plan Strategy. Note that, the data for the performance indicators is based on the projected outcomes that were stated in the grant application and grant agreement based on the allocation of the latest fiscal year's funding, although the program period for many grants extends beyond a single year period. While these outcomes may vary to some extent from the actual outcomes, historically the variation has been negligible. Therefore, OCD has concluded that it is of more value to begin the process of performance measurement based on grant award information than wait for two years or more when the grants are completed and actual outcome data is available.

Regarding long-term goals, it should be noted that the federal HUD funding has been declining for several years, while costs have continued to escalate due to a variety of factors. In such an environment, it becomes increasingly difficult to attempt to measure performance as compared to long-term production goals established several years ago. Instead, the performance measures and indicators are focused on communicating the nature and extent of the impacts of programs contained in the Consolidated Plan, particularly as they affect Ohio's communities and residents.

Note that a HUD-required performance measures report for the Housing Opportunities for Persons with AIDS Program is included in this section. The HOPWA performance measures format is provided by HUD, so it does not follow the same format as the other programs.

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

Program Year 2010

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

Objectives	Performance Measures	
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.	Owner units brought to standard	429
	Renter units brought to standard	24
	Households unable to be assisted	not currently available
Objective 2: Eliminate lead-based paint hazards through the application of interim control measures based on a risk assessment followed by a clearance examination.	Units made lead-safe and passed clearance test	453
Objective 3: Improve affordability by reducing housing operating costs through energy efficiency improvements.	Units made more energy efficient	not currently available
Objective 4: Improve accessibility to housing persons with disabilities by making modifications to dwelling units.	Units modified to improve accessibility for disabled persons	not currently available
Objective 5: Expand housing opportunities for LMI households, by providing assistance that will enable them to acquire appropriate affordable housing that meets program and local standards.	New affordable units added to the housing stock	55
	Homebuyers Assisted	76
	Family Households of 3 or more persons assisted to acquire units with 3 or more bedrooms	38
	Large Family Households of 5 or more persons assisted to acquire units with 4 or more bedrooms	22
	Number of affordable unit years created	not currently available
	Renters assisted with rental assistance payments	319
	Households not assisted due to credit problems or other issues	not currently available
Objective 6: Prevent homelessness and address immediate threats to health and safety caused by emergency housing issues, such as roof, plumbing, heating or electrical systems, or need for temporary housing assistance payments.	Households assisted with temporary housing payments Units Repaired for Immediate Health/Safety Threats	739
Objective 7: Provide supportive housing counseling services to assist lower-income households with acquiring or maintaining housing.	Persons or Families given housing counseling	311

**Housing - Housing Development
Performance Measures Report**

Program Year 2010

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

Objectives	Performance Measures	
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.	Number Affordable Units Created	619
	Number of Affordable Housing Projects Assisted	14
Objective 2: Create long-term affordable housing opportunities for residents of rental housing.	Number of unit-years of affordable housing created:	18,570
Objective 3: Expand rental opportunities for very low-income households by targeting families earning at or below 35% AMGI.	Number of households at or below 35% of area median income to benefit from affordable, HOME-assisted housing	55
Objective 4: Establish linkages between projects and local supportive services agencies.	Number of projects that will better serve residents through linkages with support service agencies	8
Objective 5: Reduce housing costs by 10% for lower-income families by encouraging energy-efficient units that also provide universal design features.	Number of lower-income households that will experience reduced housing costs of 10% or more through energy-saving / universal design features	619
Objective 6: Encourage the development of housing that serves households with MR/DD, Severe and Persistent Mental Illness or Mobility/Sensory Impairments.	Number of households with special needs that will be served by affordable housing units assisted with HOME funds	284
Objective 7: Encourage energy-efficient units that also provide universal design features.	Number of households that will benefit from HOME-assisted units that incorporate universal design and/or energy efficient features	619
Objective 8: Continue to review and refine the application process, minimizing barriers to accessing the program.	Number of comments received from advisory groups meetings	0
Objective 9: Use housing resources to improve the quality of living for low- to moderate-income households and provide housing for residents of Ohio with special needs.	Number of low- or moderate-income households that will benefit from HOME-assisted projects with community service linkages, energy saving or universal design features and/or that serve special needs households	619

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

Program Year 2010

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

Objectives	Performance Measures	
Objective 1: Offer continued support for eligible, existing grantees that meet agreed upon benchmarks and milestones in the production of affordable housing.	Total CHDO's	21
	CHDO's meeting benchmarks and goals	6
	Number of affordable projects produced by CHDO's	6
	Number of affordable units produced by CHDO's	526
Objective 2: Expand the program to include Sustaining Grants to CHDO's with service areas located in City/County Participating Jurisdictions.	Number of PJ CHDO's meeting production goals	3
	Percent of PJ CHDO's meeting production goals	50%
	Number of projects produced by PJ CHDO's	3
	Number of units produced by PJ CHDO's	218
Objective 3: Offer Capacity Building Grants to CHDO's new to the program.	Number of new non-PJ CHDO's meeting goals	N/A
	Projects by new non-PJ CHDO's	N/A
	Units by new non-PJ CHDO's	N/A

**Community Development
Performance Indicator Report**

Program Year 2010

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

Objectives	Performance Measures	
Objective 1: Assist Ohio cities and counties with addressing local community development needs by making grant awards to 79 counties and 49 cities in Ohio.	Total funds distributed to local communities	\$23,865,000
	Total number of activities funded (excludes administration)	632
	Number of people benefiting from funded activities	7,334,420
Objective 2: Revitalize neighborhoods and improve the quality of life for residents, by addressing all or part of the identified community development needs and/or by addressing all or part of the identified community development needs and/or housing needs in 100 areas annually	Number of Investment Areas Impacted by CDBG revitalization activities	227
	CDBG-funded improvements that address identified needs in local Investment Areas	335
	Persons benefiting from CDBG activities in Investment Areas	492,659
	Low- and moderate-income persons benefiting from CDBG-funded Investment area activities	320,405
	Total CDBG Funds in Activities in Investment Areas	\$14,178,410
	Other Funds	\$24,025,767
Objective 3: Address basic health and safety issues by constructing and or upgrading basic water and sanitary sewer infrastructure to comply with standards established by the EPA	Communities assisted with new or upgraded water or sanitary sewer systems that comply with EPA	22
Objective 4: Address basic health and safety needs of low-moderate income persons, neighborhoods and communities.	Number of communities assisted with fire protection equipment	28
	Number of persons in communities benefiting from improved fire protection equipment or facilities	78,950
	Number of low or moderate-income persons benefiting from improved fire equipment or facilities	45,031

**Community Development
Performance Indicator Report**

Program Year 2010

Objectives	Performance Measures	
Objective 5: Improve the quality of life for elderly persons and special needs populations by providing locally determined public services and facilities	Persons assisted by public services by type of service provided	
	Services for Disabled Persons	15,208
	Services for Elderly Persons	600
	Medical and Nutrition Programs	1,000
	Homeless and D.V. Services	99
	Other Types of Services	53
Objective 6: Improve the quality of life for elderly persons and special needs populations by providing locally determined public services and facilities	Number of Senior Center improved or constructed	
	Number of elderly persons benefiting from construction or improvements to senior centers	
Objective 7: Maintain the cultural heritage of local communities through Historic Preservation activities	Local Historic Structures Preserved	

**Economic Development Performance
Measures Report**

Program Year 2010

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

Objectives	Performance Measures	
Objective 1: Create/retain 750 jobs and at least 400 jobs for LMI persons.	Number of communities provided with economic development grant assistance	5
	Number of people whose jobs were created or retained as a result of CDBG-assisted economic development projects	145
	Number of jobs created/retained for low- or moderate-income persons	81
Objective 2: Provide CDBG assistance such that the average total cost per job created/retained is \$10,000 or less.	Average annual CDBG cost per job	\$9,058
Objective 3: Maximize participation of other resources such that projects leverage at least \$10 of other funds for \$1 CDBG funds (\$10 : \$1 leverage ratio)	Annual leverage ratio (other funds : CDBG funds)	\$9.8 : \$1
Objective 4: Improve the economic health and sustainability of local communities by adding to the tax base and local economy through expansion or retention of the existing businesses.	(a.) Annual local income tax revenue	\$145,108
	(b.) Annual local corporate tax revenue	\$550
	(c.) Annual property tax revenue	\$86,333
	Total (a-c) Additional local tax revenues generated annually	\$231,991
	Projected additional dollars expended in the local economy annually	\$5,033,600
Objective 5: Increase the number of high-value business and jobs (high-technology/manufacturing) in local communities.	High-value businesses created, expanded or retained	5

**Economic Development Performance
Measures Report**

Program Year 2010

Objectives	Performance Measures	
Objective 6: Provide training and financial support to prospective business owners to facilitate the creation of new businesses.	New businesses created	1
Objective 7: Support the revitalization and rejuvenation of neighborhoods and communities, particularly areas with economic needs, through investment in new or existing businesses.	Number of businesses located in ODOD-designated distressed area	2
	Number of businesses located in locally-designated Enterprise Zone	4
	Number of businesses located in Central business district revitalization area	2
	Number of businesses located in Low-income neighborhood or community	5
Objective 8: Support the creation and retention of business providing "living wage" jobs.	Number and percent of jobs that are created or retained that exceed 150% of the poverty level	145 100%
	Number and percent of jobs created or retained that provide employee health benefits	145 100%

**Downtown Revitalization Program
Performance Measures Report**

Program Year 2010

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

Objectives	Performance Measures	
Objective 1: Provide assistance to communities to revitalize Central Business Districts	Number of Central Business Districts Assisted	3
Objective 2: Eliminate blighting conditions by rehabilitating buildings and facades located in areas that have been designated as distressed based on HUD criteria.	Number of buildings rehabilitated	83
	Percent of buildings rehabilitated	34.6%
Objective 3: Eliminate blighting conditions by upgrading infrastructure in the designated downtown revitalization areas.	Streets improved or reconstructed (linear feet)	3,850
	Sidewalks improved or reconstructed (linear feet)	59,000
	Items installed as part of streetscaping (utility lines/poles, street lighting, benches, etc.)	35
	Parking Spaces constructed:	0
Objective 4: Leverage private and public funds for building and infrastructure improvements in the downtown revitalization area:	Other funds leveraged	\$5,083,700

**Homeless Performance
Measures Report**

Program Year

2010

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

Performance Measures	
Number of homeless shelters assisted	81
Number HH/Persons assisted with temporary shelter:	19,080 households 29,354 persons
Reduction of average length of stay:	33 days
Number of Families achieving a positive outcome:	13,736 persons
Percent of Families achieving a positive outcome:	51%
No Families moved to permanent housing:	not collected
Percent of families moved to permanent housing:	not collected
Number of families residing in permanent housing after 7 months:	not collected
Percent of families residing in permanent housing after 7 months:	not collected
Number of families moved to permanent supportive housing:	not collected
Percent of families moved to permanent supportive housing:	not collected
Number of families residing in perm supp housing after 7 months:	1,316
Percent of families residing in perm supp housing after 7 months:	89%

**Housing Opportunities for
Persons With AIDS Program
Performance Measures and
Indicators**

Program Year

2010

	HOPWA Performance Planned Goal and Actual					
	Output Households				Funding	
	HOPWA Assistance		Non-HOPWA		e.	f.
	a.	b.	c.	d.		
Goal	Actual	Goal	Actual	HOPWA Budget	HOPWA Actual	
Housing Subsidy Assistance						
Output Households						
1.	Tenant-Based Rental Assistance	0	0	0	0	0
2a.	Households in permanent housing facilities that receive operating subsidies/leased units	60	82	10	17	60,900
2b.	Households in transitional/short-term housing facilities that receive operating subsidies/leased units	0	0	0	0	0
3a.	Households in permanent housing facilities developed with capital funds and placed in service during the program year	0	0	0	0	0
3b.	Households in transitional/short-term housing facilities developed with capital funds and placed in service during the program year	0	0	0	0	0
4.	Short-Term Rent, Mortgage and Utility Assistance	658	712	12	12	585,620
5.	Adjustments for duplication (subtract)	0	0	0	0	
6.	Total Housing Subsidy Assistance	718	794	22	29	646,520
Housing Development (Construction and Stewardship of facility based housing)						
Output Units						
7.	Facility-based units being developed with capital funding but not opened (show units of housing planned)	0	0	0	0	0
8.	Stewardship Units subject to 3 or 10 year use agreements	0	0	0	0	
9.	Total Housing Developed					
Supportive Services						
Output Households						
10a.	Supportive Services provided by project sponsors also delivering HOPWA housing assistance	643	656			421,990
10b.	Supportive Services provided by project sponsors serving households who have other housing arrangements	0	0			0
11.	Adjustment for duplication (subtract)	0	0			
12.	Total Supportive Services	643	656			421,990
Housing Placement Assistance Activities						
13.	Housing Information Services	77	88			12,800
14.	Permanent Housing Placement Services	0	0			0
15.	Adjustment for duplication	0	0			0
16.	Total Housing Placement Assistance	77	88			12,800
Grant Administration and Other Activities						
17.	Resource Identification to establish, coordinate and develop housing assistance resources					0
18.	Technical Assistance (if approved in grant agreement)					0
19.	Grantee Administration (maximum 3% of total HOPWA grant)					0
20.	Project Sponsor Administration (maximum 7% of portion of HOPWA grant awarded)					76,110
Total Expenditures for program year (Sum of rows 6, 9, 12, 16, and 20)						
					1,157,420	1,157,420

**Housing Opportunities for
Persons With AIDS Program
Performance Measures and
Indicators**

Program Year

2010

Supportive Services		Number of Households Receiving HOPWA Assistance	Amount of HOPWA Funds Expended
1.	Adult day care and personal assistance	0	0
2.	Alcohol and drug abuse services	574	556,595.26
3.	Case management/client advocacy/ access to benefits & services	0	0
4.	Child care and other child services	0	0
5.	Education	0	0
6.	Employment assistance and training	0	0
7.	Health/medical/intensive care services, if approved Note: Client records must conform with 24 CFR §574.310	0	0
8.	Legal services	0	0
9.	Life skills management (outside of case management)	0	0
10.	Meals/nutritional services	0	0
11.	Mental health services	0	0
12.	Outreach	234	7,990.56
13.	Transportation	0	0
14.	Other Activity (if approved in grant agreement). Specify:	0	0
15.	Adjustment for Duplication (subtract)	152	
16.	TOTAL Households receiving Supportive Services (unduplicated)	656	564,586

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 scheduled 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 its 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:

ODOOD 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.