



Development  
Services Agency

# Proposed Program Year 2015 Ohio Consolidated Plan Annual Action Plan Executive Summary

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**May 2015**

Prepared By:  
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Community Services Division  
Office of Community Development

## **Introduction**

This Executive Summary is being provided pursuant to the March 13, 2006 revisions to the U.S. Department of Housing and Urban Development (HUD) Consolidated Plan regulations. Those regulations require that an Executive Summary be prepared, which must include:

- A summary of the citizen participation and consultation process (pages 1-2).
- A summary of proposed revisions (pages 3-5)
- Objectives and outcomes and an evaluation of past performance (pages 7-10)
- Summary of Comments received (pages 11-12)

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

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

### **PY 2015 Citizen Participation and Consultation Process**

OCD completed a number of activities designed to obtain comments, perspectives, and citizen opinions to prepare the PY 2015 Ohio Consolidated Plan Annual Action Plan. Notification of all public hearings and meetings was made at least 10 days in advance of the meetings through newsletters, direct mail and posting on OCD's website at [http://development.ohio.gov/cs/cs\\_ocp.htm](http://development.ohio.gov/cs/cs_ocp.htm). Records of these actions and documentation are available for review at the OCD office between 8 a.m. and 5 p.m. at 77 South High Street, 26<sup>th</sup> floor in Columbus, Ohio. All facilities and meeting times selected as part of the citizen participation process were chosen to accommodate persons with disabilities. The specific citizen participation activities are described as follows.

#### **1. Public Hearing On Needs**

OCD held a public hearing on needs issues on September 17, 2014, in Room 1932 on the 19<sup>th</sup> Floor of the Riffe Center, in Columbus. OCD mailed Notification of the Public Hearing on Needs information to approximately 1,000 local communities, organizations and agencies throughout the state at least 30 days in advance. DSA also published the notification on OCD's website. The notification summarized the state's planning process for the Ohio Consolidated Plan Annual Action Plan, and solicited participation in OCD's Program Advisory Committee meetings. OCD accepted written comments on needs issues for 15 days prior to the meeting (from September 2, 2014 to September 17, 2014). Comments made at the Public Hearing on Needs, or received by OCD prior to the conclusion of the hearing, were distributed to the advisory committee members for consideration during the planning process.

#### **2. Program Advisory Committees**

OCD held eight Program Advisory Committees on October 14 and 15, 2014. At least 10 members comprised the Program Advisory Committees, including local officials, program administrators, nonprofit organizations, and other agencies, organizations and individuals familiar with OCD's programs and/or the Housing Development Assistance Program administered by the Ohio Housing Finance Agency (OHFA). OCD solicited participation on the Program Advisory Committees by directly mailing information to all local communities, organizations and persons on the

OCD mailing list, which includes approximately 900 communities and organizations. The mailing also provided notification about the Public Hearing on Needs. The following Program Advisory Committee meetings were held:

- Community Development Program Advisory Committee
- Residential Public Infrastructure Grant Program Advisory Committee
- Fair Housing/New Horizons Program Advisory Committee
- Economic Development Program Advisory Committee
- Community Housing Impact and Preservation Program Advisory Committee
- Housing Development Assistance Program (HDAP) Advisory Committee
- Homeless Crisis Response Program / Housing Assistance Grant Program Advisory Committee
- Housing Opportunities for Persons with AIDS Program Advisory Committee

### **3. Consolidated Plan Advisory Committee Meeting**

The PY 2015 Ohio Consolidated Plan Advisory Committee met on February 10, 2015, to review the Draft PY 2015 Ohio Consolidated Plan Annual Action Plan. The Ohio Consolidated Plan Annual Action Plan Advisory Committee is comprised of 21 persons who represent a variety of public and private organizations that are involved with programs and issues related to housing and community development.

### **4. Notification of Public Comment Period and Distribution of Plan**

On February 28, 2015, OCD sent notification to approximately 900 communities, agencies and organizations, informing them that the Draft PY 2015 Ohio Consolidated Plan Annual Action Plan and Executive Summary are available on OCD's website for review and comment at [http://development.ohio.gov/cs/cs\\_ocp.htm](http://development.ohio.gov/cs/cs_ocp.htm). This notification also announced the beginning of the mandatory 30-day public comment period on the draft plan, including a public hearing on March 12, 2015, at 1:30 p.m. at 77 South High Street, Room 1932, Columbus, Ohio. All comments received have been included in the Draft PY 2015 Ohio Annual Action Plan.

### **Submission to HUD**

The final Ohio Consolidated Plan Annual Action Plan document will be submitted via Integrated Disbursement Information and Information Systems (IDIS) to HUD for a 45-day review period on or before May 14, 2015. Posting notification and availability of the final PY 2015 Ohio Consolidated Plan Annual Action Plan will be sent to approximately 900 communities, agencies and organizations throughout the state.

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

## **I. Community Housing Impact and Preservation Program (CHIP)**

The following changes are being proposed for PY 2015.

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

## **II. Housing Development Assistance Program**

The following changes are being proposed for PY 2015.

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

## **III. Community Housing Development Organization Operating Grant Program**

The following changes are being proposed for PY 2015.

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

## **IV. Homeless Crisis Response Program**

The following changes are being proposed for PY 2015:

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

## **V. Supportive Housing Program**

The following changes are being proposed for SFY 2016:

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

## **VI. Housing Assistance Grant Program**

There are no major changes being proposed for SFY 2016.

## **VII. Housing Opportunities for Persons with AIDS Program**

There are no major changes being proposed for PY 2015.

## **VIII. Community Development Program**

The following changes are being proposed for PY 2015:

- The language that limited each local jurisdiction to only having one open award at any given time was removed. OCD determined the requirement was unduly restrictive. Language not allowing prior competitive set-aside grant awards to be used as match for current year applications was maintained.
- Jurisdictions awarded PY 2013 or PY 2014 Downtown Revitalization competitive set-aside program funds may not reapply for PY 2015 Downtown Revitalization funds unless the previous grant has been monitored and significant monitoring issues resolved. Language was required for PY 2015 to mirror language for the other competitive set-aside programs. OCD must be able to document successful completion of previous competitive set-aside awards to evaluate administrative capacity and fulfill close-out requirements of the U.S. Department of Housing and Urban Development. Language did not exist in the PY 2013 and PY 2014 because there were not any communities that had received prior awards.
- Based upon the Department of Housing and Urban Development release of low- and moderate-income data in June of 2014, grantees will now be expected to utilize the new data source in order to determine eligibility.
- Included as part of the Committing Community Development Allocation Program Funds section, Allocation projects that entail major water or sanitary sewer improvements will be evaluated in a similar fashion to RPIG projects even if RPIG is not an identified funding source. Applicants must submit Ohio EPA Permit to Install or Plan Approval, if applicable and account for new household connections at the time of application.

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

- As part of the Community Development Allocation Grants Program communities applying to OCD for funding will be required to submit a Community Development Implementation Strategy (CDIS), which prioritizes local projects and evaluates how CDBG-funded programs may assist with each project. Projects submitted for funding under the Community Development Allocation Grants Program should be included in the long term plan of the county or direct grantee city.

- The Office of Community Development proposes to add fire protection facilities to the list of eligible Critical Infrastructure projects. Based on comments made at the Program Advisory Committee, eligible communities were in favor of expanding eligible activities to include fire protection facilities and other “non-infrastructure” types of public improvements. Infrastructure facilities will continue to be eligible.
- Clermont County is no longer eligible for Community Development Program CDBG funds due to an increase in population over 200,000. Clermont County will only be eligible for HOME funds.

## **IX. Economic Development Loan and Public Infrastructure Grant Program**

The following changes are being proposed for PY 2015:

- A Letter of Interest is required prior to submission of a full application for the Residential Public Grant Program. The state will review the Letter of Interest and notify the applicant if a full application will be accepted. OCD must set up communities in the OCEAN system to allow the submission of applications for PY 2015. The Letter of Interest will allow OCD to screen projects for eligibility prior to commencement of the application process. Communities invited to submit an application will be set up in the OCEAN-system for on-line submission.
- The long term sustainability of the system will be evaluated as a Residential Public Grant Program threshold based on the rate structure and demographics of the user population. The application will also be rated based upon these criteria. With the collection of income data via the American Community Survey (as opposed to the U.S. Census), median household income data now has a large margin of error and is no longer consider to be a reliable source on which user fees should be calculated as a percentage. This change sets a minimum dollar threshold for user fees. Sustainability is also now a scoring consideration as CDBG-funded projects must be able to operate long-term without an additional influx of program dollars.
- Clermont County is no longer eligible for Economic Development and Public Infrastructure Grant Program CDBG funds due to an increase in population over 200,000. Clermont County will only be eligible for HOME funds.

## **X. Target of Opportunity Grant Programs**

The following changes are being proposed for PY 2015:

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

## **XI. New Horizons Fair Housing Assistance Program**

There are no major changes being proposed for PY 2015.

# PY 2015 Consolidated Plan Budget

Programs	Federal And State Funds Total	Pct. of Total	Consolidated Plan Total <sup>(1)</sup>	Pct. of Total	Funding Sources				
					1	2	3	4	5
					Federal CDBG	Federal HOME	Federal ESG	Federal HOPWA	State OHTF <sup>(2)</sup>
Community Housing Impact and Preservation Program	\$ 18,582,600	29.2%	\$ 18,582,600	29.2%	\$ 8,200,000	\$ 10,382,600			*
Housing Development Assistance Program <sup>(2)</sup>	\$ 3,500,000	5.5%	\$ 3,500,000	5.5%		\$ 3,500,000			*
CHDO Competitive Operating Grant Program	\$ 500,000	0.8%	\$ 500,000	0.8%		\$ 500,000			
<b>Affordable Housing Subtotal</b>	<b>\$ 22,582,600</b>	<b>35.5%</b>	<b>\$ 22,582,600</b>	<b>35.5%</b>	<b>\$ 8,200,000</b>	<b>\$ 14,382,600</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
Homeless Crisis Response Grant Program <sup>(3)</sup>	\$ 5,219,700	8.2%	\$ 5,219,700	8.2%			\$ 5,219,700		*
Supportive Housing Grant Program	\$ -	0.0%	\$ -	0.0%					*
Housing Assistance Grant Program	\$ -	0.0%	\$ -	0.0%					*
Housing Opportunities for Persons With AIDS	\$ 1,266,159	2.0%	\$ 1,266,159	2.0%			\$ 1,266,159		
<b>Homelessness &amp; Supportive Housing Subtotal</b>	<b>\$ 6,485,859</b>	<b>10.2%</b>	<b>\$ 6,485,859</b>	<b>10.2%</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 5,219,700</b>	<b>\$ 1,266,159</b>	<b>\$ -</b>
Community Development Program <sup>(4)</sup>	\$ 20,200,000	31.8%	\$ 20,200,000	31.8%	\$ 20,200,000				
Economic Dev. & Public Infrastructure Program <sup>(5)</sup>	\$ 10,000,000	15.7%	\$ 10,000,000	15.7%	\$ 10,000,000				
Microenterprise Business Development Program	\$ -	0.0%	\$ -	0.0%	\$ -				*
<b>Community &amp; Economic Development Subtotal</b>	<b>\$ 30,200,000</b>	<b>47.5%</b>	<b>\$ 30,200,000</b>	<b>47.5%</b>	<b>\$ 30,200,000</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
Target of Opportunity Grant Program	\$ 1,000,000	1.6%	\$ 1,000,000	1.6%	\$ 900,000	\$ -	\$ 100,000		*
New Horizons Fair Housing Assistance Program	\$ 50,000	0.1%	\$ 50,000	0.1%	\$ 50,000				
Training and Technical Assistance Funds	\$ 334,500	0.5%	\$ 334,500	0.5%	\$ 334,500				*
Community Development Finance Fund	\$ -	0.0%	\$ -	0.0%					*
Resident Services Coordinator Program	\$ -	0.0%	\$ -	0.0%					*
Administration <sup>(6)</sup>	\$ 2,941,242	4.6%	\$ 2,941,242	4.6%	\$ 911,913	\$ 1,598,033	\$ 431,296	\$ -	*
<b>Totals =</b>	<b>\$ 63,594,201</b>	<b>100%</b>	<b>\$ 63,594,201</b>	<b>100%</b>	<b>\$ 40,596,413</b>	<b>\$ 15,980,633</b>	<b>\$ 5,750,996</b>	<b>\$ 1,266,159</b>	<b>\$ -</b>

(1) The "Consolidated Plan Total" column includes the CDBG, HOME, ESG and HOPWA funds awarded to the State of Ohio.

(2) OHTF allocations are contingent upon approval by the OHTF Advisory Committee and the Director of the Development Services Agency. Further, OHTF grant awards are contingent upon Controlling Board approval. OHFA administers the HDAP, ODA will administer the Resident Services Coordinator Program, and Ohio CDC will administer the Microenterprise Business Development Program. Therefore, in addition to program funds, OHFA will receive HOME and OHTF administrative dollars and ODA will receive OHTF administrative dollars.

(3) The Homeless Crisis Response Grant Program includes the OHTF funding set asides required by ORC Section 174.02 and unrestricted OHTF dollars.

(4) The Community Development Program includes the funding allocation for the Formula Allocation and three competitive set asides; Neighborhood Revitalization Grants, Downtown Revitalization Grants, and Critical Infrastructure grants (Approximately 40% of the Community Development Program will be allocated for these competitive awards).

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

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

## **Program Goals, Objectives, Performance Measures and Indicators**

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

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

**4a - Homeless Prevention Activities**

Number of Persons in Households	Total
Adults	2627
Children	2334
Don't Know /Refused	0
Missing Information	2
<b>Total</b>	<b>4963</b>

**4b - Rapid Re-Housing Activities**

Number of Persons in Households	Total
Adults	2170
Children	1480
Don't Know /Refused	0
Missing Information	1
<b>Total</b>	<b>3651</b>

**4c - Shelter Activities**

Number of Persons in Households	Total
Adults	1417
Children	641
Don't Know /Refused	0
Missing Information	0
<b>Total</b>	<b>2058</b>

**4d - Street Outreach**

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know /Refused	0
Missing Information	0
<b>Total</b>	<b>0</b>

Clients Contacted (DQ) 0  
 Clients Engaged (DQ) 0

**4e - Total Persons Served**

Number of Persons in Households	Total
Adults	6034
Children	4289
Don't Know /Refused	0
Missing Information	3
<b>Total</b>	<b>10326</b>

5 - Gender

Gender	Total
Male	4658
Female	5665
Transgendered	0
Unknown	3
<b>Total</b>	<b>10326</b>

6 - Age

Age	Total
Under 18	4289
18-24	1185
Over 24	4849
Don't Know /Refused	0
Missing Information	3
<b>Total</b>	<b>10326</b>

7 - Special Populations

Special Populations Sub-populations	Total	Total Persons Served Prevention	Total Persons Served RRH	Total Persons Served in Emergency Shelters
Veterans	228	67	83	88
Victims of Domestic Violence	1056	317	465	327
Elderly	137	56	52	33
HIV/AIDS	20	8	9	3
Chronically Homeless	494	33	286	189
Persons With Disabilities	Total	Total Persons Served Prevention	Total Persons Served RRH	Total Persons Served in Emergency Shelters
Severely Mentally Ill	1056	352	530	193
Chronic Substance Abuse	297	52	169	82
Other Disability	1262	556	531	208
<b>Total</b>	<b>3237</b>	<b>1092</b>	<b>1427</b>	<b>823</b>

Race/Ethnicity of Total Persons Served

Race	Total	Hispanic/Latino
White	7995	402
Black or African American	1739	73
Asian	15	7
American Indian or Alaska Native	17	1
Native Hawaiian or Other Pacific Islander	4	2
Asian & White	2	0
Black or African American & White	453	39
American Indian or Alaska Native & Black or African American	15	0
Other Multi-Racial	62	9
Unknown	20	10
<b>Total</b>	<b>10326</b>	<b>544</b>

**Affordable Housing Performance Measures**

Rental units constructed	Household Housing Unit	153
Rental units rehabilitated	Household Housing Unit	54
Homeowner Housing Added	Household Housing Unit	26
Homeowner Housing Rehabilitated	Household Housing Unit	1,011
Direct Financial Assistance to Homebuyers	Households Assisted	59
Tenant-based rental assistance / Rapid Rehousing	Households Assisted	149
Homelessness Prevention	Persons Assisted	234
Housing for Homeless added	Household Housing Unit	0

**Community Development Performance Measures**

Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	697,347
Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	190,380
Facade treatment/business building rehabilitation	Business	72
Homeowner Housing Rehabilitated	Household Housing Unit	37
Buildings Demolished	Buildings	28
Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	300

**Economic Development Performance Measures**

Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15,875
Facade treatment/business building rehabilitation	Business	1
Jobs created/retained	Jobs	343
Businesses assisted	Businesses Assisted	9

## Responses to Comments on the Draft PY 2015 Ohio Consolidated Plan

The Office of Community Development held the 30-day public comment period beginning on February 28, 2015, along with a Public Hearing that took place on March 13, 2015, in the Riffe Center on the 19<sup>th</sup> Floor. All comments received along with the corresponding responses prepared by OCD and the OHFA concerning the Draft PY 2015 Ohio Consolidated Plan have been included below:

**Comment 1:** The programs included in the Consolidated Plan aren't in line with the original intention of the CDBG, which was to create viable urban areas. The programs are not urban in nature.

**Response 1:** The goal of developing viable urban areas with CDBG funds is achieved through the direct allocations each area receives from HUD. The State of Ohio, as a participating jurisdiction, receives an allocation from HUD to specifically represent rural areas that do not receive an allocation from HUD.

**Comment 2:** The Consolidated Plan Advisory Committee should be comprised of not less than 50% from the private sector.

**Response 2:** The Ohio Consolidated Plan Annual Action Plan Advisory Committee is comprised of 21 persons who represent a variety of public and private organizations that are involved with programs and issues related to housing and community development. To implement a 50% mandate is not necessary. The committee is already represented by a reasonable percent from the private sector.

**Comment 3:** ODSA should describe what types of sub-recipient agreements are prohibited

**Response 3:** No sub-recipient agreement is allowed when administering the CHIP Program. Grantees must adhere to Policy Notice OCD 13-04 which has been revised and available for comment as Policy Notice 15-01. The Consolidated Plan is meant to describe, in general, the programs and activities that OCD will administer. It is not meant to outline every rule and regulation that must be adhered to for each program.

**Comment 4:** In order to maintain flexibility there should be additional eligible activities allowed.

**Response 4:** Based on historical data and performance, OCD has made the decision to limit the activities to those most often requested and where performance is typically achieved.

**Comment 5:** New construction shouldn't only be permitted as part of HFH projects.

**Response 5:** Historically, new construction has not only been requested on a limited basis, but performance has not been consistently achieved. The HFH model has had a high rate of success, markets to very low income households, and achieves outcomes at a very low cost by using donated labor, materials, and sweat equity by the homeowner. Therefore, OCD has made the decision to eliminate new construction as an activity, unless it is a HfH project.

**Comment 6:** Under Program Income, ODSA should define the primary housing activity and should also provide clarification as to what is stated by "committed housing program income must be disbursed prior to the grantee requesting funds from the State." Is this referring to the drawdown requests?

**Response 6:** The word "primary" has been removed. The program no longer has primary and secondary activities. A definition has been provided for committed program income.

**Comment 7:** Under the Performance Rating Criteria all OCD administered programs should be evaluated instead of "they may be evaluated."

**Response 7:** Thank you for your comment.

**Comment 8:** Under Rating Criteria sub-categories should be included.

**Response 8:** There are no subcategories under rating criteria categories. All criteria used to score applications is listed in the paragraphs under each category name.

**Comment 9:** The CHIP partnerships have been effective tool.

**Response 9:** Thank you for your comment.

**Comment 10:** ODSA eliminate the Formula Allocation due to its limited funding and small grant amounts. The minimum funding amount should be \$100,000 by eliminating cities and counties and lowering the maximum amounts.

**Response 10:** ODSA supports the Formula Allocation structure as it provides an on-going relationship between state and local governments, develops and maintains administrative capacity, and provides a residual community development benefit. Eligibility and funding parameters are discussed annually at the program Advisory Board meetings. The committee did not propose any changes for PY 2015. This topic will be discussed again at the PY 2016 meeting.

**Comment 11:** The CDIS process is supported.

**Response 11:** OSDA will continue to require the CDIS process for PY 2016 program planning. The process will be re-evaluated in 2016 for the PY 2017 program.

**Comment 12:** The grant ceiling for competitive Community Development Programs should be raised from \$300,000 to \$500,000.

**Response 12:** ODSA has considered raising the grant ceiling for the competitive CD programs. Participants at the Advisory Board meeting were not opposed to increasing the cap, but were concerned fewer projects would be funded. ODSA will re-visit this topic at the PY 2016 meeting.

**Comment 13:** He recommends strengthening the required RLF commitments under the Community Development Program similar to the 100% required as part of the CHIP. He asks that OCD establish that a minimum percent of program income commitment required as part of the application

**Response 13:** ODSA recently evaluated the status of the more than 100 ED RLFs and required CD program commitments for communities with stagnant or very low balances. Communities with stagnant balances are required to commit 50% up to \$100,000 to their PY 2015 CD programs. Communities with very low balances are required to commit the entire balance. All other communities are encouraged to use RLF funds in conjunction with program funding.

**Comment 14:** The NSP Program Income should be returned to the grantees but keep the OHFA Program Income.

**Response 14:** Thank you for your comment.

**Comment 15:** Is the monitoring staff report, as well as the grantee response to the report required within 30 days or 45 days?

**Response 15:** The monitoring report should be mailed by OCD within 45 days of the monitoring date. Grantees typically have 30 days to respond to monitoring reports. OCD maintains some flexibility with these time constraints under some circumstances that may require more time. The Consolidated Plan has been modified accordingly.