

Hamilton County, Ohio
2010 Consolidated Annual Performance & Evaluation Report (CAPER) Narratives

A. Assessment of One Year Goals and Objectives

The 2010 Action Plan for the Community Development Block Grant Program allocated \$846,100 for high priority infrastructure improvements, \$900,000 for high priority owner rehab and repair needs, \$332,000 for high priority planning and fair housing needs, \$357,000 for high priority social/public services, \$50,000 for medium priority park and recreation needs, \$235,000 for senior center improvements and amenities, \$100,000 to support the county-wide food pantry, \$125,000 for removal of blight and demolition (including acquisition of blighted properties, and county-wide spot blight demolition.) The Emergency Shelter Grant Program expended all of its funds to support a high priority homeless shelter program. The HOME Program allocated funds for four activities: Tenant Based Rental Assistance, Excel Development TBRA, a combination of new construction and rehab and soft second mortgages for home buyers in the Villages of Lockland and St. Bernard and the City of North College Hill, and funding to address a gap in multi-family rental housing, all of which were high priority needs.

B. Affirmatively Furthering Fair Housing

Hamilton County has taken the following actions during the 2010 program year to affirmatively further fair housing and remove barriers to affordable housing:

1. Hamilton County contracted with Housing Opportunities Made Equal for \$75,000 for that agency to provide fair housing services, education, and complaint investigation within Hamilton County. The County has a long relationship with HOME and the agency is well suited to its mission in that it provides these services not only to Hamilton County but also to the City of Cincinnati, thus providing a single point of contact for the entire Hamilton County housing market. Employees of the Community Development, Planning and Building Inspections Departments attended two fair housing trainings offered by HOME during the previous program year.
2. Hamilton County has utilized both its CHDO set-aside and other HOME funds to work with neighborhood non-profits to rehab and construct new housing for first-time homebuyers. We will continue working with those non-profits during 2010 to develop new single-family homes for low to moderate-income families in Lockland, North College Hill, St. Bernard, and Elmwood Place. These new homes represent some of the only affordable new construction that is available within these communities.
3. The County utilized a significant portion of its HOME Investment Partnerships funding for a Tenant Based Rental Assistance Program during 2010. The County dispersed \$1,000,223 in FY2010 for the in-house TBA program, and an additional \$121,465 for the funding provided to Excel Development to administer their small

TBA program. The TBA program is focused on providing Tenant Based Rental Assistance to families or individuals who have physical or mental disabilities. Eight of the TBA Vouchers are also set-aside for homeless families moving into transitional housing.

4. The County provided Community Development Block Grant funds for counseling for homeowners at risk of losing their homes to foreclosure. 49% of the households counseled were minorities, compared to a minority homeowner population in the County of 8%.
5. The County had engaged as an active participant in the “Homeless to Homes” initiative, a planning process to identify and address coordination of housing and services for homeless individuals, many of whom are disabled. This process was completed in April of 2009. Subsequently, an implementation plan was formulated by many participants – some whom were involved in the original planning process. The County has been actively involved in this as well, and attends quarterly Steering Committee meetings.
6. The County contracted with the City of Cincinnati in late 2008 to implement a City-funded TBRA Program. This Program became fully implemented in 2009 and leasing was increased in 2010 to take advantage of additional funds which would be available until the contract ends in 2011. The contract will be renewed for an additional year, at the minimum.

Analysis of Impediments Update

The City of Cincinnati and Hamilton County jointly requested that Housing Opportunities Made Equal, a Fair Housing Agency, conduct the Analysis of Impediments to Fair Housing Choice (A.I.) for the City and County jurisdictions. The A.I. was completed in May, 2009, and in the A.I., 18 recommendations were made to respond to the issues of 1) NIMBYism based on stereotypes, 2) improving choice in the Housing Choice Voucher Program, 3) predatory lending and lending discrimination, 4) discrimination against people with disabilities, 5) a lack of accessible housing, 6) discrimination against families with children, and 7) Sexual Harassment. The City and County then began a series of monthly meetings with a working group made up of staff from City Planning and Buildings, City Office of Budget and Evaluation, City Department of Community Development, and the County Department of Community Development, to address the report and its recommendations, and to create a Fair Housing Advisory Committee (FHAC) to advise the City and County on the plan and its final recommendation. The FHAC is charged with expanding on the draft responses to the identified impediments, including (1) determining goals and timelines to address each impediment, (2) resources or programs that will be used in financing the fair housing actions, (3) individuals, groups, or organizations to be involved in each action, including defining responsibilities, and (4) identifying a process for monitoring the progress in carrying out each action and evaluating its effectiveness.

The FHAC was formed, consisting of 16 representatives, including City and County staff, from agencies serving people with disabilities, fair housing, affordable housing advocates, banks, Legal Aid, the Cincinnati Metropolitan Housing Authority (CMHA), and others. Meetings were held in February, March, and April 2010. The City and County staff

evaluated the responses and recommendations from the committee and have formulated this Fair Housing Action Plan. Updates are posted to this document as they are implemented.

NIMBYism based on Stereotypes

- 1) The City and County need to work with CMHA to provide accurate information about the Housing Choice Voucher Program, including how the program works, the percentage of elderly and disabled people on the program, and the percentage employed. The communities also need accurate information on comparative rates of assisted housing concentration.

Currently the Housing Authority keeps statistics on their clientele, including statistics on numbers of elderly, disabled, and employed receiving assistance. This information is brought to the public's attention occasionally, when prompted. In addition, the local HUD office maintains a spreadsheet showing assisted housing by community and neighborhood in the City and County. The City and County would like to work with the CMHA and HUD to disseminate this information more widely and make this information easier to access by the public. This could be done through a media campaign, or through other venues such as housing workshops. The City, the County, CMHA, Housing Opportunities Made Equal, and Affordable Housing Advocates will work together to conduct a joint informational campaign in 2011.

CMHA has the statistics readily available upon request, but not currently on their website. They agree that adding this information to their website would make this information more accessible to the public.

Affordable Housing Advocates (AHA) is doing PR/Marketing on the "true face" of affordable housing. All the parties mentioned should get together to talk about what each of us is doing. Suggestions were also made to form a "working group" made up of the City, County, CMHA, HOME, and AHA (perhaps also landlord reps?), to work on those many impediments identified through the Plan where these entities are key players (for example, to talk about education, rent reasonableness, etc.).

Timeline: Begin 2011

- 2) The City and County should support, encourage, and participate with neighborhood groups who value inclusion and welcome new neighbors.

The City and County support this recommendation, and welcome assistance from the Fair Housing Advisory Committee to help implement it. Currently the City's Neighborhood Summit and the County's First Suburbs quarterly meetings provide venues for this initiative.

A condition of funding for the City's Neighborhood Support Program (NSP) could require that neighborhood community councils facilitate discussion groups and/or programs on fair housing issues.

To tie fair housing issues more closely with development projects, the City and County will encourage developers awarded contracts, to attend fair housing training. The City and County will require developers seeking public assistance for any project with at least 50 housing units to conduct an analysis of the impact of the development on racial integration in the community. The analysis will assist the jurisdictions in determining whether support for the project is consistent with their obligation to affirmatively further fair housing.

Public Service Announcements will be used to get the word out about Affordable/Fair Housing concerns. CMHA should provide outreach and data to the community and advertise in their newsletter.

CMHA has expressed interest in speaking to the First Suburbs group. Lisa Isham and Boubacar Diallo should be contacted to schedule. CMHA will be invited to have a booth at the Neighborhood Summit in 2011. CMHA is currently working on a marketing campaign, featuring "good stories" about their clients.

Timeline: Begin 2011

- 3) The Cincinnati Planning Department and the Hamilton County Regional Planning Commission could take the lead in creating a positive image of diverse, mixed income communities.

The City and County support this recommendation, and welcome assistance from the Fair Housing Advisory Committee and the corresponding departments to help implement it. Currently the City's Neighborhood Summit, the County's First Suburbs meetings, and the Affordable Housing Advocates annual meeting provide venues for this initiative.

In February 2010 City Planning held a kick off at the annual city-wide Neighborhood Summit for the start of the Comprehensive Planning process. This plan will be completed in 2011. City Planning will use the planning process and the Comprehensive Plan to help create a positive vision of diverse, mixed income communities.

The County will analyze the County's COMPASS Housing section for recommendations in this area, and follow up with those recommendations.

Neighborhoods will be encouraged to highlight positive news and events related to fair housing issues at City Council meetings via awards presented to the communities. Awards could be presented on a quarterly basis.

The First Suburbs initiative is always looking for speakers for their quarterly meetings. A subcommittee of the FHAC could meet with the First Suburbs Executive Committee to discuss providing speakers, or working in concert in some areas.

When 2010 census results are released and the Stable Integrated Communities research is updated, it is hoped that additional City neighborhoods and County communities will be added to the list of those that have been racially integrated for at least 20 years. The City Council and County Commission will honor the Stable Integrated Communities at public meetings.

AHA is interested in being invited to any of the mentioned forums to present information about their group.

Timeline: Begin 2011

- 4) Elected officials and candidates should be asked to sign a pledge to refrain from inflaming racism and prejudice and to show respect for all citizens and their neighborhoods in campaign advertising and rhetoric.

The City and County support this recommendation, and welcome assistance from groups such as

the Affordable Housing Advocates, the League of Women Voters, the Center for Independent Living Options, the Apartment Association, and others to help implement it.

In 2006, the Affordable Housing Advocates (AHA) created a pledge form, which they have been using and they will make an effort to increase its use in the future. Any local candidates for elected office will be approached to sign the pledge.

Timeline: Ongoing

Improve the Choice in the Housing Choice Voucher Program

- 5) CMHA, the City, and the County should collaborate on an active program to recruit landlords in low poverty areas and provide information and support to families with Section 8 Vouchers interested in making integrative moves.

The City currently provides funding to Housing Opportunities Made Equal. Housing Opportunities Made Equal administers the Section 8 Counseling Program, which provides assistance to Voucher holders to find units in low poverty areas and to recruit landlords in these areas. It may be difficult to provide additional funding from the City or County due to public service limits on the CDBG Program funds, but that can be explored. The County operates a tenant based rental assistance program with HOME funds, and recruits landlords for that program. The City, County, and CMHA could form a working group to discuss this collaboration, and explore what funding may be provided from other funding sources to expand current efforts. The County will provide funding in 2011 to Housing Opportunities Made Equal to expand the Mobility program. In order to reduce concentrations of assisted housing in certain areas of the County, Housing Opportunities Made Equal will help county residents with vouchers find housing in communities where there is currently little assisted housing, or in low poverty areas.

Held discussion with CMHA about “Go Section 8” (current tool being used to give clients information about available apartments), and HousingLocator.org.

For 2011 \$55,000 of CDBG funding is allocated for the City’s Section 8 Tenant Counseling and Placement program. This program provides placement and transportation services to Section 8 voucher holders to assist them in securing affordable housing in low poverty neighborhoods outside of the City of Cincinnati. In addition to the services mentioned above, Housing Opportunities Made Equal also provides an outreach component to landlords. This program offers housing choices for residents, as one of the recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

Timeline: Ongoing

- 6) The City and County should ask CMHA to refrain from actions that limit housing choice such as using tenant-based vouchers to create project-based units or seeking ways to restrict access to certain neighborhoods.

As referenced in the response to recommendation # 5, a working group made up of City, County, and CMHA representatives, along with some other stakeholders, could discuss what limitations the CMHA can or cannot make, the reasons behind these actions, and what incentives they can implement to expand housing choice.

The affordable housing advocates have recommended the following:

“While current HUD rules permit CMHA to project base up to 20% of its Housing Choice Vouchers (HCV), AHA urges that CMHA limit use of this program to a small percentage of funding. AHA believes CMHA should use Project Based Vouchers strategically to expand housing opportunities. In addition to using the option to geographically expand housing opportunities, CMHA should use it to assist low income households with special needs, who have trouble finding suitable housing with tenant-based vouchers and to promote renovation of good existing affordable housing in a way to improve neighborhoods. CMHA should not use project basing of HCV to limit housing choice. “

The City and County held discussions with CMHA, but did not come to a conclusion about how to address this. CMHA does not intend to use project based Vouchers to limit housing choice.

This was discussed with AHA staff. AHA emphasized the last line, “CMHA should not use project basing of HCV to limit housing choice. “ If it isn’t limiting housing choice, then it’s not an issue.

Timeline: Ongoing

- 7) The City and County should involve Section 8 tenants in community meetings, including upcoming meetings to develop a Cincinnati Comprehensive Plan and community meetings to discuss community development funding.

The City and County are supportive of this recommendation, and normally include a representative of either the Housing Choice Voucher (HCV) Program, or other CDBG or HOME funded program on their respective committees, such as the County’s Community Development Advisory Committee (CDAC). In addition, now that the Tenants United for Truth group has been formed, made up of HCV clients, the City and County will invite this group to participate and comment on various plans and funding recommendations.

Several fair housing advocates have volunteered to work with City Planning staff on the Housing and Neighborhood Development element of the City’s Comprehensive Plan. Fair housing issues will be directly addressed in the plan. City Planning commits to conducting specific outreach to low-income tenants in the Comprehensive Planning process.

CMHA will help to outreach to their clients by: (1) putting information into Tenant Information Packets, (2) adding information to videos that play during recertification meetings, and (3) putting links to these community meetings on their website.

Timeline: Ongoing

- 8) The City and County should work with CMHA to establish a Community Advisory Committee that includes Section 8 tenants and advocates, landlords, and representatives of communities concerned about the impact of families with Vouchers moving to their neighborhoods.

The City and County support this recommendation, and have expressed an interest in serving on such a committee. CMHA is finalizing this committee and it will include representatives of the City and the County.

CMHA has this specific committee on hold right now, due to legal questions about having Board members at a meeting not considered public. In the meantime, clients and citizens can access

Board members at Board meetings. Also, clients or concerned citizens can attend Manager's night in, afterhours.

At a meeting with AHA, we discussed the idea of having a working group (see under #1), to deal with other issues that the above mentioned committee would not take on.

Timeline: Late 2010

Predatory Lending and Lending Discrimination

- 9) Assertive law enforcement action is needed on fraudulent foreclosure prevention scams, the next generation of predatory lending that is targeting minority communities.

The City and County support this recommendation, and will support initiatives that will assist in this effort. Legal Aid will draft correspondence for sign-on by the City and County to advise the Prosecutor's office, Sherriff's office, area police departments, and the FBI of the need for assertive law enforcement action in this area.

The City has allocated \$137,000 in 2011 CDBG funding for the Emergency Mortgage Assistance program. Under contract with the Legal Aid Society the program provides up to three months of mortgage payments for low-income City of Cincinnati homeowners facing foreclosure due to predatory lending, job loss, illness, death of the primary wage earner, or other circumstances beyond their control. Homeowners may receive this assistance to bring their loan current if they have reestablished an income stream. All clients in mortgage trouble receive in-depth foreclosure prevention counseling and case management that links them with other social service agencies. This program addresses one of the predatory lending recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

The County has allocated \$95,000 of 2011 CDBG funding for foreclosure prevention counseling, also to assist in this area.

The City has allocated \$262,458 in HOME funding for Downpayment Initiative program. The downpayment assistance is used towards the purchase of single family housing by low- to moderate- income owner-occupant families who are first-time homebuyers. Eligible project costs includes downpayment and closing costs. Families are counseled on becoming homeowners and all houses are inspected. Only traditional mortgage products may be used with this program in order to avoid predatory loan products. This program addresses one of the predatory lending recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

The County also allocates HOME funding to provide a soft second mortgage to buyers of the CHDO developed homes, to make them more affordable to buyers below 80% of median income.

Timeline: Late 2010

- 10) The City and County should ask the banks in Hamilton County to review their HMDA data, and where racial disparities exist, to conduct self-testing and establish Mortgage Review Committees to ensure that loan originators and underwriters are not letting stereotypes and prejudice affect their decisions.

The City and County support this recommendation. The City and County will work with lenders to

hold an annual forum for mortgage lenders and brokers to discuss how they handle and update their review process, and how they will address disparities found. Criteria will be developed for lenders and brokers to present their statistics from HMDA data and address any disparities that may exist.

HOME has offered to help with this. A discussion regarding the planning and agenda for this forum will begin at the next financial dialogue meeting of the Federal Reserve Bank scheduled for April or May, 2011.

Timeline: 2011

- 11) The City and County should work with major lenders to place more branches in minority and low- and moderate-income neighborhoods.

The City and County support initiatives to encourage lenders to expand access to lending and banking services. In this time of cutbacks and consolidation, many banks are not expanding facilities, but if they are, we encourage them to consult with the City and County and fair housing agencies to determine where branches are needed. In addition, many banking services are accessible through the Internet, so education and training in on-line banking could be provided by lenders to increase the accessibility to lower income and minority consumers. The City and County will encourage banks to offer alternative methods of access to low – moderate income and minority households. This discussion could occur at the annual forum with lenders mentioned in the response to #10.

The City provides some funding to SMART MONEY Community Services, which provides credit union services and economic education to households in a low income area.

Financial Stability Coordinating Council Task Force Overviews

Purpose

Work in collaboration with bankers, community-based representatives, local government officials and financial regulators to connect Greater Cincinnati's unbanked and underbanked individuals with appropriate and affordable, mainstream financial services.

Accomplishments

Four committees: Financial Education; Product & Services; Tracking & Measurements; and Marketing & Community Outreach having been working to complete respective tasks. National ad firm, Landor, has been secured to provide all design materials pro bono. Surveys of all financial institutions completed. 13 financial institutions & credit unions signed on.

What Lies Ahead

Financial recommendations from each subcommittee due in October. Lead staff person in process of being hired and will be housed at Smart Money. Kick off for Bank-On re-scheduled to mid January 2011. Small loan products work being developed as an off-shoot of Bank On Initiative.

Timeline: Ongoing

Discrimination against People with Mental Disabilities

- 12) Training needs to be provided to government officials and local zoning boards in Hamilton County on the Fair Housing Act rights of people with disabilities and the liability of jurisdictions who violate the law.

The City and County support this recommendation. Currently, training is provided by Housing Opportunities Made Equal to County personnel as needed. This effort could be expanded to include more County staff, City staff, and staff of other local zoning boards. In 2010 City Council and the Mayor were invited to fair housing training and they will be invited to fair housing trainings in the future.

The Hamilton County Regional Planning Commission provides a range of training for local zoning commissioners. Fair housing training specifically related to zoning issues will be included in their course offerings.

Timeline: Ongoing

- 13) The City Planning Department and Hamilton County Regional Planning Commission should provide sitting assistance programs that enable the sitting of special needs housing by providing community education, dispute resolution services, and tools such as Good Neighbor Agreements.

The City and County support this recommendation, and welcome assistance from the Fair Housing Advisory Committee and the corresponding departments to help implement this initiative. The Planning Partnership meets annually and sitting assistance could be discussed as a training topic. The City and County could provide awareness coaching to the communities, non-profits and developers.

Timeline: 2011

A Lack of Accessible Housing

- 14) When the City and County issue occupancy certificates for new multifamily buildings, the inspectors should ensure that the minimal accessibility requirements of the Fair Housing Act are met. Additional training is needed to ensure the inspectors understand that under the Fair Housing Act and the Ohio Building Code, regardless of how units in covered multifamily buildings are classified, they must be minimally accessible to persons with mobility impairments.

The City of Cincinnati has taken several steps to address this impediment. In 1998 the City Council established the Cincinnati Accessibility Board of Advisors to consider and make recommendations to the City Manager on issues of accessibility for disabled persons related to future public projects within the City. Ordinance 0239-2009 was approved September 2, 2009 to broaden the purpose of the advisory committee to include making recommendations to the City Manager on all general matters of accessibility for disabled persons within the City. The City's Senior Buildings Plans Examiner, from the Department of Planning and Buildings, participates with this committee in an ongoing capacity as it works to identify mobility issues and solutions.

In 2009 Housing Opportunities Made Equal held training for Hamilton County staff from the divisions of Community Development, Planning, and Building Inspection to review Fair Housing laws. In January 2010, a more specific training was held with County Building Inspection staff to review the specific requirements related to accessibility. Plans are underway to hold this specific training for existing Building Inspections staff on a bi-annual basis, with trainings held more frequently for new staff.

The City has begun scheduling fair housing training that began April 30, 2010 and invited the Mayor, members of the City Council, and staff from departments such as Community Development.

This comprehensive training covers housing for people with disabilities including accessibility requirements for new construction. Appropriate staff of the Department of Planning and Buildings will attend this training by 2011. Housing Opportunities Made Equal will conduct a training program with City inspectors in late 2010, similar to the one conducted for the County Building Inspection staff, and the City is considering offering this on a bi-annual basis. It specifically covers the Fair Housing Act design and construction requirements for new multifamily buildings.

The Department of Planning and Buildings has requested a minimum of \$5,000 in funding for the following in 2011:

- Books on ADA for use by Plan Reviewers and the general public.
- Staff training on a regular basis.

Timeline: Ongoing

- 15) The City and the County should expand their programs that provide accessibility modifications for existing housing to serve renters as well as homeowners.

The City and County support this recommendation. The County has committed \$100,000 of 2010 and 2011 CDBG funds for a program to provide grant funds for accessibility modifications for low-income renters. The County worked with organizations that assist renters with disabilities to determine need, scope, and final program design, and have kicked off the Program in September 2010.

Timeline: Fall, 2010

- 16) Information on accessible rental units needs to be made more readily available.

The City and County support this recommendation, and welcome input from the Fair Housing Committee and organizations that assist persons with disabilities, to implement this recommendation. The County currently encourages use of HousingLocator.org for clients in the Tenant Based Rental Assistance Program, which can note this in the database. Accessboard.gov is an additional site for assistance. CMHA is using a new service for their listings called "Go Section 8". A campaign has been launched for this new website. The free website allows the landlord to upload their information on available housing.

CMHA is now promoting the use of "Go Section 8" by sending out information to clients, including in Mover Briefings, and putting brochures in their front lobby kiosk.

For 2011, \$500,000 of HOME funding will be provided to continue a contract to Hamilton County Community Development to operate and provide Tenant Based Rental Assistance (TBRA) to eligible households within the City of Cincinnati. The TBRA will cover a portion of the household rent payment for a minimum of 85 client households. The program is marketed to persons with disabilities. This program addresses the lack of accessible housing recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

Timeline: Ongoing

Discrimination against Families with Children

- 17) A significant marketing campaign could open the housing market to families by raising public awareness that housing discrimination against families with children is illegal. It would encourage parents who experience discrimination to call Housing Opportunities Made Equal and would educate the small landlords who receive no professional training.

The City and County support this recommendation. The Hamilton County Auditor tracks owner occupancy versus rentals for tax discount purposes, so this information could be used to help pinpoint owners of rental properties for educational mailings.

Proclamations are issued and special attention is paid to this issue during Fair Housing Month. Flyers/brochures will be placed at different locations such as the Department of Community Development, City Planning and Buildings, the Permit Center and the Hamilton County Administration Building on an ongoing basis.

Conduct a marketing campaign for families. Currently there is training being done for landlords. The City and County should meet to strategize on how to market and educate the community on fair housing laws. Some ideas that could be considered are showcasing this information on the "Gems of the Queen City" Citicable show, or on other television shows or other social media. The City and County will work with Housing Opportunities Made Equal to coordinate this to begin in 2011.

Timeline: Ongoing

Sexual Harassment

- 18) Educate female tenants that sexual harassment by landlords is illegal and should be reported to Housing Opportunities Made Equal. Target the message to female university students and Section 8 tenants who are particularly vulnerable because of their age and low-income.

The City and County support this recommendation. Input from the Fair Housing Advisory Committee is now being evaluated and will be added to this response.

The City of Cincinnati has allocated \$214,500 in 2011 CDBG funding to carry out its fair housing activities under contract with Housing Opportunities Made Equal (H.O.M.E.) to promote equal housing opportunities for all home seekers regardless of race, sex, color, nationality, religion, handicap, or familial status, and to reduce unlawful discrimination in housing and increase integration throughout Cincinnati's neighborhoods. The program does complaint intake, investigation, counseling, and files legal complaints against persons, firms, or organizations suspected of discrimination in housing. This program addresses many of the resolution of illegal practices recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio. The County provides \$75,000 of CDBG funds to H.O.M.E. each year to fund similar activities.

For 2011 \$187,000 of City CDBG funding is allocated for the Tenant Representation Project (TRP) administered by the Legal Aid Society. The project provides legal representation for low and moderate-income tenants in the City of Cincinnati. The TRP prevents homelessness by stopping unlawful evictions, corrects illegal lockouts and utility shutoffs, and requires landlords to complete repairs to make rental units decent, safe, and sanitary. The project also prevents retaliation against tenants who ask the City Building and Health Departments to inspect for code violations. This program addresses one of the illegal practices recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

Housing Opportunities Made Equal launched for the first time a radio campaign on the topic of sexual harassment.

CMHA offers education during their Housing Choice Vouchers (HCV) briefings on the issue.

The City and County should promote awareness of the issue.

H.O.M.E. should provide ongoing training to the Police Department on sexual harassment; due to the number of complaint calls they receive on the issue. Police officers will learn to refer women to Housing Opportunities Made Equal if the complaint involves housing, but is not criminal.

CMHA suggested they could add information about this into the Fair Housing section of their Tenant Handbook, that is given to clients at the initial Briefing.

The County or City should take the initiative to ask Sheriff or police Departments to invite HOME to provide training. HOME has lost touch with police officers – need to re-establish a relationship.

Timeline: Ongoing

Conclusion

These recommendations will be reviewed quarterly by City and County staff in a formal setting, to track progress in each of the areas of the Fair Housing Action Plan. At least 2 times per year the staff will convene the Fair Housing Advisory Committee, so that the Committee can add additional input on progress, and formulate new or change existing recommendations. Formal reporting to HUD will be done on an annual basis in conjunction with the CAPER.

C. Affordable Housing

People Working Cooperatively (PWC) completed repair jobs for 633 clients to help maintain habitability of their homes. Cincinnati Housing Partners completed three new homes and sold one of these homes located in Lockland. The Tenant Based Assistance Program assisted an average of 202 client families during the program year (179 through the in-house program and 23 through Excel Development). All of the new clients served by the Tenant Based Assistance Program during 2010 were persons with special needs relating to disabilities, or homeless families.

In its 2010-2014 Consolidated Plan, Hamilton County estimated that 6,062 rental households were in need of priority rental assistance because of cost burden greater than 50%. The County also assigned high priority to assisting rental households with incomes below 50% of the median. Similarly, 6,360 owner-occupied housing units were identified as high priority because of cost burden greater than 50%. (See Housing Needs Summary Table of the Hamilton County Consolidated Plan.) Of the 633 homeowners assisted by People Working Cooperatively (PWC) 321 were extremely low income owner households, and 312 were low income owner households. The Hamilton County Housing Rehab and Sewer and Water-tap program assisted _____ households during the program year, of which _____

were extremely low-income, _____ were low-income and _____ were moderate-income households. All 202 households assisted under the Tenant Based Assistance Program were low or extremely low-income. All the renter and owner benefiting households identified above met the Section 215 definition. The actual number of households assisted represented a very small percentage of the owners and renters who were identified with priority needs. The mismatch between need and housing units assisted is a result of insufficient financial resources.

D. Continuum of Care Narrative

Homeless Needs

Actions taken to address the needs of homeless persons: The City of Cincinnati, Ohio addresses the needs of homeless persons through the Cincinnati/Hamilton County Continuum of Care for the Homeless (CoC). The CoC covers two jurisdictions – the City of Cincinnati and Hamilton County, Ohio. These jurisdictions have worked together on developing and implementing a combined strategy since 1996. The goals and objectives are identical in each of the jurisdictions' Consolidated Plans that have been approved by the City Council and Mayor of the City of Cincinnati and the Hamilton County Commissioners.

The lead entity is the Cincinnati/Hamilton County Continuum of Care for the Homeless, Inc. (CoC, Inc.) who is responsible for all CoC process staffing. Staff responsibilities include: facilitation of the year-round planning, coordination and program implementation processes for homeless housing and services within the jurisdiction and facilitation of the annual grant application process to HUD and other collaborative grant initiatives. The lead facilitator of the CoC's process is Kevin Finn, Executive Director of the CoC, Inc. The City of Cincinnati assumes primary responsibility for funding/contracting with the CoC, Inc. to provide planning, implementation and oversight.

The CoC process is a *single, coordinated and inclusive process* for planning and management of the local (City of Cincinnati and Hamilton County) Continuum, including planning for persons on the streets, within emergency shelters, in transitional housing facilities and housed within permanent supportive housing sites.

The coordinating body – the Homeless Clearinghouse is composed of representatives of each of the following bodies: The City of Cincinnati, Department of Community Development and Planning; Hamilton County, Community Development Department; the Greater Cincinnati Coalition for the Homeless; and a representative from each of the Working Groups of the CoC. The Clearinghouse meets quarterly for scheduled meetings, as well as on an as-needed basis. The Clearinghouse provides year-round coordination, planning, program development, funding, program/housing support, and technical assistance. The purpose of the Clearinghouse is to:

1. Plan and coordinate community influence on systemic decisions affecting the homeless.

2. Uphold the elements of the Consolidated Plan that affect homelessness.
3. Identify and support the utilization of all sources of funds and other resources used to improve the quality of life for homeless persons and/or to end homelessness.

The Working Groups of the CoC are active, inclusive entities designed to provide direct input in planning, implement planning initiatives, coordinate day-to-day activities of providers, reduce/eliminate duplicative efforts, actively promote best-practice methodologies, and implement access improvements for mainstream resources. These working groups provide the framework to ensure ongoing, active participation of the entire community including: veterans services, organizations representing persons with special needs or disabilities, faith-based and community-based organizations, state and local governmental agencies, PHA's, housing developers law enforcement, hospital and medical services, funders, local businesses and homeless/formerly homeless persons. Each working group listed below plays a unique role in our Continuum's process of transitioning homeless persons into housing.

Working Group	Focus Area	Prime Activities
Family Shelter Partnership Program (FSPP)	Families in shelter	Coordinating quality case management Coordinating mainstream resources (TANF, FS, CHIP, Medicaid, Child Care, Child Protection)
Homeless Individuals Task Force (HIT Force)	Homeless single individuals & chronically homeless	Coordinating resources for single individuals Improving access to mainstream services (MH/SA) Implementing a Chronic Homeless Initiative (HIP)
Homeless Outreach Group (HOG)	Street homeless & chronically homeless	Coordinating outreach efforts Increasing access to housing/services directly from the streets
HMIS Advisory Committee	HMIS quality and Integrity	Implementing HMIS Policy/Procedure Development & Oversight
Permanent Housing Group	SHP permanent housing for the disabled	Promoting best practice efforts in housing and case managing homeless persons with special needs (MH, SA, HIV/AIDS, dual disabilities, etc.)
Shelter Plus Care Work Group	Shelter Plus Care housing programs	Increasing community access to Shelter Plus Care housing
Transitional Housing Group	SHP transitional housing programs	Dealing with issues of access and capacity in the area of transitional housing

Benefit Access Group	Access to public benefits	Facilitating access to and streamlining application processes for mainstream benefits
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To further ensure there are not duplicate efforts in coordination and planning for homeless housing and services the City of Cincinnati contracted with The Partnership Center Limited (PCL) beginning in 2004 to incorporate funding/administration of ESG and HOPWA into the CoC and its processes. In 2008, the city began contracting with the newly incorporated Cincinnati/Hamilton County Continuum of Care for the Homeless, Inc. for these functions. In 2004, PCL convened the process for the Homeless/Special Needs Section of the Consolidated Plans of both the City and County through the CoC process. Thus ensuring one consistent and consolidated plan for all components of the CoC (prevention, outreach, intake, and assessment, emergency shelter, transitional housing, and permanent supportive housing were created and incorporated into both city and county governments.

Cincinnati/Hamilton County CoC agencies were awarded approximately \$11.5 million from the 2009 Homeless SuperNOFA, of which approximately \$3.8 million were new projects. In 2010, agencies applied for approximately 11.7 million in grant funding of which 3.4 million were new projects. As of February 2010, the award for new projects has yet to be announced. The CoC agencies were awarded 8.5 million in renewal grants.

Homeless Prevention

A Family Homelessness Prevention Program (FHPP) was begun with funding from the Ohio Department of Development in January 2008. The Program serves families at risk of becoming homeless. This program is connected for intake purposes to the new Central Access Point (CAP) line which, since March 2008, has been handling intake into the family shelters. Through this connection, homeless families are placed by CAP into shelter; at risk families are placed by CAP into the FHPP program. The FHPP Program helps families facing homelessness by offering financial support and case management for up to six months. The families work with a case manager to develop of plan to overcome any barriers they might have toward gaining housing stability (i.e. connection to mainstream benefits or other community resources they might be eligible for).

The Stimulus funded **HPRP Prevention Program** is a short term (up to three months) program designed to help families and individuals most at risk for homelessness and who without this assistance would become homeless. Activities eligible for financial assistance include rent, utility bills, security deposit, and utility deposit. The screening criteria for accessing the HPRP Prevention Program funds include: having an income or income potential, income less than 50% of the Area Median Income, having no other financial resources or supports to remain stably housed, no stays in a homeless shelter in the past two years, a willingness to work with a case manager for up to 3 months and most importantly the **ability to remain stably housed after receiving the temporary assistance.**

The Stimulus funded HPRP **Rapid Re-Housing Programs** are designed to assist homeless individuals and families with few barriers to stability transition more quickly out of emergency shelter into stable housing. Clients who are identified as appropriate candidates for the **Rapid Re-housing Programs** must all: agree to up to 12 months of case management, have income or income potential, not have an income that exceeds 50% Area Median Income and most importantly, have the ability to remain stably housed after receiving temporary assistance.

The **CoC Rapid Re-Housing for Families Demonstration Project** was awarded in 2009 but not implemented until February 2010. The CoC Rapid Re-Housing for families serves families who have been identified as having a “moderate” level of barriers to obtaining and maintaining housing stability.

The HPRP funds have been dispersed in a partnership between the Cincinnati/Hamilton County Continuum of Care for the Homeless, Inc. and the United Way while other Homeless Prevention Programs continue to be operated in the same way they have been historically, and coordinated by the local FEMA Board. These programs provide emergency rent/mortgage/utility assistance etc., however, the CoC and the United Way have begun conversations regarding how, between now and when HPRP funds are exhausted, to adapt the traditional Emergency Assistance Centers to follow the HPRP model and provide both a higher level of financial assistance combined with a higher level of case management services to prevent homelessness, and also lessen the burden on at-risk families and agency staff by eliminating the need for households to go to many separate agencies to receive the amount of assistance they need.

The FreeStore/FoodBank and Mercy Franciscan at St. John’s are the largest providers of prevention assistance. Mercy-Franciscan at St. John’s, the Salvation Army, and the Center for Independent Living Options have administered prevention programs targeted to prevent homelessness or homeless recurrence through an Ohio Department of Development- homeless support grant and when available in the past, local ESG funds. With these funds they pay emergency assistance designated toward prevention. FreeStore/FoodBank programs such as Direct Rent, which manages welfare checks for families, and the Payee Program, which provides a payee for SSI/SSA checks, ensures rental payments are made, which are critical homeless prevention activities. The Community Action Agency administers the community’s energy assistance prevention funds.

E. Other Actions

Other efforts made with regard to the Consolidated Plan and affordable housing in Hamilton County are summarized under the headings below.

Obstacles to meeting underserved needs - The primary obstacle to meeting underserved needs within Hamilton County is fiscal. The County’s housing, community development, and emergency shelter needs far outweigh available funding resources either from the federal government or through state or local resources.

Fostering and Maintaining Affordable Housing – The County implements several programs, described earlier, to foster and maintain affordable housing, such as the County-wide Housing Repair Program, the Water and Sewer Grant Program, and the CHDO Housing development program for Homeownership. Also, now the County operates a Neighborhood Stabilization Program, which is providing affordable housing for households up to 120% of median income. Affordable rental housing is maintained by continuing the TBA Program, as well as involvement in Affordable Housing Advocates meetings and committees. In August of 2008, the County contracted with the City of Cincinnati to operate a TBRA program for the City using City HOME funds. The City chose the County to operate the program, due to the County's successful operation of its own TBA Program for many years. The Program got underway in late 2008, and was fully leased at 85 households by October 2009. The City increased authorization for leasing due to additional funds available, and lease-up to the final number of 125 households was reached in March 2010.

The County committed \$300,000 of HOME funds to fill a gap in a HUD 202 project for elderly scheduled for St. Bernard. The project timeline is for the agreement to be executed in May 2011, and construction to take place in 2011 and into 2012.

Eliminating Barriers to Affordable Housing - This section is addressed in Section "B", Affirmatively Furthering Fair Housing.

Institutional Structure - Hamilton County enjoys active and successful participation among both public and private sectors, including numerous voluntary and non-profit groups and agencies in the development of housing and related activities. The County's strategy, as expressed in the Consolidated Plan, is to build on the strengths of the institutional capacity already in place.

Efforts to achieve cooperation and coordination with State, local and private agencies and institutions in the implementation of housing and related supportive services are numerous and on-going. Most obvious among these are the direct working relationships, cooperation and coordination inherent between the State and the County Department of Job and Family Services, the Community Mental Health and Recovery Services Board, and the Developmental Disabilities Board. In 2006, an alliance was formed among four non-profit Counseling agencies to provide foreclosure prevention counseling services and rescue funding to homeowners at risk of losing their homes through foreclosure, often as a result of predatory lending. A fifth organization has also joined this alliance.

A significant change in institutional structure for assisted housing was the merger of the County's Housing Choice Voucher Program with the Housing Authority's, a process that began with discussions in the summer of 2005, began in earnest in January 2006 and was substantially completed by July 2006. Although there were many factions which did not agree with this decision, the merger has provided a single point of contact for the community for the Housing Choice Voucher Program.

In 2007, the Community Development Department was consolidated into the Regional Planning Department, to allow for greater coordination of services and plans. In late 2008, the process began to consolidate the County Departments of Public Works, Building Inspections, and Regional Planning Commission (including Community Development.) This consolidation was mostly completed by the end of 2009, and is creating better efficiencies, coverage of service, and coordination of planning, development, and services.

Public Housing Improvements/Resident Initiatives - The Cincinnati Metropolitan Housing Authority participates in the Capital Fund Program and is solely responsible for maintaining and reporting progress as prescribed by HUD. The applicable Capital Fund Program Annual Statement/Performance and Evaluation Report for the PHA has been completed by the Housing Authority and submitted to the County Community Development Department. However, the documentation is voluminous. While referenced and readily available, this information is not reproduced herein as a practical matter.

The County plans no specific action with regard to resident initiatives because that responsibility lies with the Cincinnati Metropolitan Housing Authority. However, the County actively communicates with the Housing Authority, and gives input to changes considered for the Community.

In 2010, the County and CMHA began to actively pursue a new Cooperation Agreement for housing to be developed in Hamilton County, outside of Cincinnati. Although several meetings were held, and drafts were exchanged, this Agreement had not yet been executed by the end of the 2010 Program Year (February 28, 2011.) However, it is anticipated that a new Agreement will be executed by Spring 2011.

Lead-Based Paint Hazard Reduction - Hamilton County follows all current regulations with regard to lead based paint. Units assisted with HOME TBRA funds are inspected annually for compliance with the Lead Based Paint regulations.

Program Compliance - County program staff do a periodic review of County administered housing, community development, and emergency shelter grant programs to ensure compliance with program and comprehensive planning requirements. Generally, a desk review is performed at least annually, and on-site monitoring visits are completed approximately every two years, depending on the amount of funding provided, risk analysis, and federal regulations. The preparation, dissemination, and review of the Consolidated Annual Performance and Evaluation Report (CAPER) also provides opportunities for performance review by both the federal agency and interested citizens.

Reducing the number of persons living below the poverty level - Community Development Block Grant, HOME, and Emergency Shelter Grant funds cannot be used to directly support the incomes of persons to reduce the overall number of

persons living below the poverty level. The programs do, however, provide a number of support mechanisms to assist persons who are living below the poverty level. It is hoped that these supports, which range from rental housing assistance and counseling to direct food support from the FreeStore, to 1st month's rent and security deposit from Goodwill, will stabilize the lives of low income persons to permit them to take the actions necessary to improve their income and living standards.

F. Leveraging Resources

Many of the Community Development Block Grant projects also included contributions from local units of government to fully fund the activities. All of the social service providers assisted with Block Grant funds utilized other federal, state and/or local funds within their agency. All of the properties sold by our participating CHDO's utilized a first mortgage from a private sector lender in addition to a soft second mortgage provided by Hamilton County utilizing HOME funds. The HOME match requirements were met by counting State of Ohio funds used by the Mental Health and Recovery Services Board for its HAP rental assistance program.

G. Citizen Comments

On May 2, 2011, Hamilton County published a notice of the availability of its 2010 Consolidated Performance and Evaluation Report (CAPER). The notice detailed the programs covered by the Performance Report and invited citizens to obtain a copy of the report as well as to give comments. _____ comments were received by the May 25, 2011 deadline that was established in the Notice. Other than minor editing, the Performance Report submitted to HUD is the same document that was available for Citizen Review and Comment. This included the IDIS reports that were printed and appended to the County's submission to HUD.

H. Self Evaluation

In reviewing both the new and ongoing projects undertaken in 2010, it is evident that many projects were successful in providing help to communities and the County in general, by participating in the Community Development Block Grant Program. Homeownership Counseling funded by Community Development Block Grant to help prevent foreclosures began in 2007 and was immediately used by all four counseling agencies to begin to assist homeowners, and funding continued to be used throughout 2010. Funding for Countywide spot demolition for various participating communities in the County to demolish vacant, abandoned, and blighted residential buildings, was reduced in 2010 due to lack of available funds. The ULAP Project for demolition of commercial structures has been very popular, and funding was increased in 2010 to address the need. These programs, along with projects specific to the individual communities, has resulted in better visibility and functionality for these areas.

The attached chart, Summary of Specific Annual Objectives, outlines how projects

carried out in 2010 provided decent housing, a suitable living environment, and expanded economic opportunity, principally for low and moderate-income persons.

Indicators that describe results of projects completed in 2010 are shown in the IDIS reports, attached as part of this CAPER.

Barriers that had a negative impact on fulfilling the housing strategy of providing homes to low-income homebuyers included the downturn of the economy and tightened credit restrictions, which has put a damper on the CHDO activity of constructing and selling new homes. The County's two CHDO's, Cincinnati Housing Partners and Working in Neighborhoods, did very little rehab or construction during 2010, as they were actively trying to sell other homes, and did not want to build an over supply of homes that may not sell in this market.

One home was sold during the program year, two remained unsold, one was under contract and was ready to close at the end of the program year, and one had recently begun rehab.

Certifications of Consistency

Hamilton County, Ohio certifies that during FY2010, it provided Certifications of Consistency for HUD and other programs in a fair and impartial manner. The County further certifies that it did not hinder Consolidated Plan implementation by either action or willful action.

Performance Measures – see the accompanying Summary of Specific Annual Objectives chart to see the reports of actual measures for activities completed during the 2010 program year.

2010 Community Development Block Grant Program Narrative

Community Development funds were used to meet priority needs identified in the Consolidated Plan as previously described under Section A of the Consolidated Plan Narrative. Community Development Housing Funds for fiscal year 2010 were used either to benefit low-to-moderate income persons or eliminate slums and blight. Community Development housing funded activities included homeowner repair provided through the non-profit People Working Cooperatively, and community run repair programs in Colerain Township, Forest Park, Golf Manor, and Springdale. All housing funds and most other Block Grant funds went to high need priorities established by the Consolidated Plan.

There were no significant changes in the Community Development Block Grant Program during fiscal year 2010.

In reviewing the implementation of the Community Development Block Grant Program for FY 2010, Hamilton County pursued all resources that were identified to support Community Development Block Grant funded activities. Also, the County

cooperated with other entities in applying for other resources that supported the Community Development Block Grant Program or related activities identified in the Hamilton County Consolidated Plan. In addition, all grant funds were used either to primarily benefit low to moderate income persons or to eliminate slum and blight. The portion of 2010 Community Development Block Grant funds used to benefit low to moderate income persons also exceeded the overall benefit standard.

In 2010, Hamilton County did not fund any projects which involved the involuntary acquisition or demolition of occupied or recently occupied homes or businesses; no relocation was triggered by either voluntary or involuntary acquisition.

Hamilton County did not undertake any direct economic development activities utilizing Community Development Block Grant funds. The County does provide some funding from its Planning and Administrative dollars to Hamilton County Development Company, for economic development planning studies.

Hamilton County funded a number of direct benefit activities that served a limited clientele. Activities benefiting seniors or persons with handicaps met the presumed benefit criteria of the Community Development Block Grant Program. Activities that did not meet the presumed benefit criteria qualified by collecting income information from the project beneficiaries to assure that at least 51% of the beneficiaries were low to moderate income.

Hamilton County received program income to its Community Development Block Grant Program from three sources during 2010. A majority of program income came from loan repayments from the Housing Rehab Program. A second source of miscellaneous income was from the rental of facilities developed using Community Development Block Grant funds, that are rented during off hours when not used for their primary program purpose. The third source was from repayments from the Housing Repair Program. These repayments are from deferred loans that are repaid where the home is either sold or refinanced.

Hamilton County has not identified any Neighborhood Revitalization Strategy (NRS) areas in its jurisdiction for the CDBG Program.

2010 HOME Program Narrative

2010 HOME funds were allocated for four projects plus program administration. Because Hamilton County has an adequate supply of rental housing in standard condition, HOME funds were primarily used to make that housing affordable to low income persons through a Tenant Based Assistance Program. The County allocated \$1,000,000 for the in-house Tenant Based Assistance Program for one year, and \$260,000 for the Tenant Based Rental Assistance Program run by Excel Corporation was allocated out of 2009 funding for a two year contract. Cincinnati Housing Partners was allocated a portion of a set-aside of \$225,165 in 2010 CHDO funds to support new construction and acquisition with rehab in the Village of Lockland, the City of St. Bernard, and the City of North College Hill. This program

makes home ownership available to low-moderate income home buyers within these municipalities. The new construction and rehabilitation is part of an overall program to upgrade the housing stock within these communities. \$300,000 of HOME funds were set aside for rental housing gap financing for a Section 202 project to be developed by Volunteers of America.

As part of its overall monitoring responsibilities, Hamilton County inspected various HOME assisted units during the past year. All units inspected either initially met or were repaired to meet Housing Quality Standards or local code.

The County has an Affirmative Marketing Plan that is included in all contracts for HOME projects, that specifies what the County and the developer will undertake in marketing HOME assisted units. In 2010, all HOME projects that included construction and marketing of HOME units were developed by Cincinnati Housing Partners, an experienced developer and CHDO which has worked with the County developing housing for many years. As specified in the documents executed between the parties, outreach to minority and women owned businesses is made as part of the affirmative action provisions of the documents. Statistics are reported by the developer to the County for inclusion in the Form HUD-40107, outlining minority and women owned businesses used in contracts. Also, reports on the race of homebuyers of the housing developed by CHP is reported in the IDIS system.

2010 Emergency Shelter Grant Narrative

Hamilton County's Emergency Shelter Grant (ESG) Program makes up a relatively small portion of the Continuum of Care that was developed jointly by the City of Cincinnati and Hamilton County, but its ESG expenditures are consistent with the goals, objectives, and priorities of the CoC. Because of the limited funding available to Hamilton County, the County has expended all of its Emergency Shelter Grant funding for one activity to simplify the administration of the Program. The activity, the Mt. Airy Shelter, provides dormitory living and associated social services for homeless men with alcohol and chemical dependency problems. This shelter need was identified as a high priority need in the Consolidated Plan.

The Hamilton County Emergency Shelter Grant funds are combined with funds from the Community Development Block Grant Program to pay a portion of the operating costs of the Mt. Airy Center. The facility was previously operated by the Hamilton County Department of Human Services, but due to funding cutbacks and change in mission, operations of Mt. Airy were transferred over to Talbert House, a successful bidder of the RFP issued by the City of Cincinnati.

A new grant agreement was executed between Talbert House and Hamilton County Community Development for ESG and CDBG funding in 2009, as well as some of the CDBG-R funds awarded to the County. Matching funds for the ESG grant are provided by other funding sources that Talbert House receives for Mt. Airy, such as VA and state funding.

CD: PERFRPT2009