



**Department of  
Development**

Office of Housing and Community Partnerships

# **Fiscal Year 2008 Ohio Consolidated Plan Executive Summary**

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## **July 2008**

**Prepared By:**

**Ohio Department of Development**

**Community Development Division**

**Office of Housing and Community Partnerships**

**Ted Strickland**, Governor of Ohio

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## **Introduction**

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

- A summary of the citizen participation and consultation process (pages 1-2).
- Objectives and outcomes and an evaluation of past performance (pages 8-19)
- Summary of comments on the plan and responses to comments (pages 20-27)

A budget table from the FY 2008 Ohio Consolidated Plan is also included on page 7, along with a summary of the changes proposed for the 2008 plan on pages 3-6. Information on the State's past performance includes a listing of each program's goals and objectives, as well as performance measures and performance indicators for each objective. Please note that the current 2007 program will not be fully implemented until June 30, 2007. Therefore, the most current summary data addressing past performance is for the 2006 program year. Much more detailed information about the 2006 programs and activities is available in the Fiscal Year 2006 Consolidated Plan Annual Performance and Evaluation Report, which is required to report on the progress that the state has made in carrying out its Strategic Plan and its Action Plan. The report covers the Community Development Block Grant (CDBG) Program, the HOME Investment Partnerships (HOME) Program, the Emergency Shelter Grant (ESG) Program and the Housing Opportunities for Persons With AIDS (HOPWA) Program. Copies of the FY 2006 Annual Performance Report (APR) may be obtained from OHCP upon request, please call (614) 466-2285 or stop by the OHCP office, which is located at 77 South High Street, 24<sup>th</sup> floor, Columbus, Ohio 43216-1001. The FY 2006 APR is also posted on the web at [www.odod.state.oh.us/odd/ohcp/publications.htm](http://www.odod.state.oh.us/odd/ohcp/publications.htm).

## **FY 2008 Citizen Participation and Consultation Process**

OHCP carried out a number of activities designed to obtain comments, perspectives, and opinions of citizens during the preparation of the FY 2008 Ohio Consolidated Plan. Notification of all public hearings and meetings was made at least 10 days in advance of the meetings through newsletters, direct mail and through publication in newspapers of general circulation throughout the state. Records of these actions and documentation are available for review at the OHCP office, located on the 24th floor at 77 South High Street in Columbus, Ohio during regular business hours. The specific citizen participation activities are described below.

### **Public Hearing On Needs**

OHCP held a public hearing on needs issues on October 3, 2007 in the Lobby Hearing Room of the State Office Tower, 30 East Broad Street, in Columbus. Several suggestions or comments were made on needs issues at the hearing, which were presented and discussed at the Program Advisory Committee meetings.

### **Program Advisory Committees**

Meetings were held with 10 Program Advisory Committees on October 18 and 19, 2007. Each of the Program Advisory Committees was comprised of at least 10 members, including local officials, program administrators, non-profit organizations, and other agencies, organizations and individuals familiar with OHCP's programs and/or the Housing Development Assistance Program administered by OHFA. This year participation on the committee was solicited by notification to all local organizations and persons on the OHCP mailing list, which includes over 1,100 organizations. The notification also provided information on the public hearing on needs which was held on October 3, 2007.

The following Program Advisory Committee meetings were held:

Formula Allocation/Imminent Threat/Neighborhood Revitalization Program Advisory Committee  
Water and Sanitary Sewer Program Advisory Committee  
Fair Housing/New Horizons Program Advisory Committee  
Economic Development Program Advisory Committee  
Microenterprise Business Development Program Advisory Committee  
Community Housing Improvement Program Advisory Committee  
Housing Development Assistance Program Advisory Committee  
Comprehensive Downtown Revitalization Program Advisory Committee  
Homeless Assistance Program / Housing Assistance Program Advisory Committee  
Housing Opportunities for Persons With AIDS Advisory Committee

### **Consolidated Plan Program Advisory Committee Meeting**

The FY 2008 Ohio Consolidated Plan Advisory Committee met on February 6, 2008 to review the draft FY 2008 Ohio Consolidated Plan. The Ohio Consolidated Plan Advisory Committee was comprised of about 30 persons who represent a variety of public and private organizations that are involved with programs and issues related to housing and community development. Several comments and suggestions were made by the committee members, a number of which were incorporated into the draft plan.

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

On March 1, 2008, notification was sent to approximately 1,100 agencies and organizations, informing them that the FY 2008 Draft Ohio Consolidated Plan and Executive Summary was posted on OHCP's website ([www.odod.state.oh.us/cdd/ohcp](http://www.odod.state.oh.us/cdd/ohcp)) for their review and comment. This notification also announced the beginning of the mandatory 30-day public comment period on the draft plan, which included a public hearing at the Lobby Hearing Room of the Rhodes State Office Tower on 30 East Broad Street on March 19, 2008 in Columbus, Ohio at 1:30 p.m. Notice of the public comment period and the public hearing was posted in 12 newspapers of general circulation throughout Ohio. Public comments received during the comment process or at the public hearing are included in the plan on pages 174-182, along with a response to each comment.

### **Submission to HUD**

The final plan document was submitted to HUD for a 45-day review period on April 25, 2008. Notification of the posting and availability of the final FY 2008 Ohio Consolidated Plan will be sent to about 1,100 agencies and organizations throughout the state.

## **FISCAL YEAR 2008 OHIO CONSOLIDATED PLAN**

### **Summary of Revisions**

#### **Introduction**

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

The revisions that are proposed in the FY 2008 Ohio Consolidated Plan are summarized below. Only significant program revisions are listed, not minor revisions, such as application due dates, etc.

#### **Community Housing Improvement Program (CHIP)**

- **Eligible Activities:** “Public Residential Rehabilitation, including Shelters for Special Needs Populations” was removed as an eligible activity.
- **Program Period:** The program period has been extended by two months, which will provide greater overlap between closing the previous year's program and starting up the current year program.
- **Grant Ceiling:** The grant ceiling remains the same -- \$500,000; however, the set aside for Rental Rehabilitation has been eliminated.
- **Community Housing Improvement Strategy (CHIS):** Prior to the submission of a CHIP funding application, each applicant must have an approved Community Housing Improvement Strategy or, for Entitlement Communities, an approved Consolidated Plan based on 2000 Census data and the Strategies element (Section 4) of the CHIS. The Strategy must have been submitted along with a copy of the community's Policy and Procedure Manual by November 2, 2007 in order for the community to be eligible to apply for FY 2008 CHIP funding, and by November 2, 2008 in order for a community to be eligible to apply for FY 2009 CHIP funding. Instructions for the CHIS and Policy and Procedure Manual may be found at the following OHCP website: <http://www.odod.state.oh.us/cdd/ohcp/CHISTools.htm>.
- **Project-Specific Applications:** Project specific activities will no longer be eligible under CHIP, but should be submitted under the discretionary program. Enough funds will be moved from the CHIP into the discretionary program to cover the amount of these projects typically funded through CHIP. Activities that have in the past been submitted as project specific, but will be done over and over again in a similar manner such as many Habitat for Humanity projects should have their program descriptions added to the communities policy and procedure manual and be submitted in the same manner as the “client-based” activities.
- **60% Expenditure Threshold:** Applications submitted by current CHIP grantees that have not expended at least 60% of any active CHIP grant funds, exclusive of administration, rental rehab supplement, and TBRA funds, will not be reviewed. OHCP will calculate the ratio of expended funds based on drawdown records, at the time of the application submission deadline.

## **Housing Development Assistance Program (HDAP)**

- 7) Timeline: Added a Construction Commencement Date for projects participating in the Housing Development Gap Financing program. Construction must begin within 12 months of signing the funding agreement.
- 15) B. Rental Projects (including Preservation Projects) - Grants:  
  
Language added: Projects that meet both the requirements established by OHFA for Permanent Supportive Housing and the above noted conditions are also eligible to request a grant.
- 18) Programs: Allows OHFA to exceed the established per-project limits for projects developed by State Certified CHDO's in an effort to ensure an adequate developer fee. Applies to HDAP funds used to develop Homeownership, Rental, Preservation and Housing Credit projects.

### **B. Housing Credit Gap Financing**

- Funding Limits: Increases the funding limit for projects that meet the criteria established for Permanent Supportive Housing from \$750,000 to \$1,000,000 (\$37,500 per unit). Increases the funding limit for Multifamily Bond projects that meet the project factors established for the Volume Cap selection from \$350,000 to \$500,000.
- 22) Application Review: Adds financial feasibility and marketability to the review criteria; removed local government and community support as minimum requirements. These are now considered with the project design criteria.
- Language added: The Ohio Housing Finance Agency reserves the right to establish policies that allow for additional gap financing through HDAP if, after evaluating the changing equity market, it is determined that the limits established for the Housing Credit Gap Financing do not adequately address the demonstrated needs for safe, decent and sanitary housing development.

## **Community Housing Development Organization (CHDO) Operating Grant Program**

- Total funds available: Removed the 5% set-aside for CHDO's in non PJ areas, which are new to the competitive operating grant program.
- Maximum Funding Awards (annually): Reduces sustaining grants from \$50,000 in non-PJs to \$45,000 in non-PJs.

Deleted the following requirements:

- Maximum of three CHDOs funded in PJ county and two in a non-PJ county;
- CHDOs applying for the sustaining grant funds must meet the Threshold Requirements;
- CHDOs in non-PJ areas that cannot yet meet the Threshold Requirements, may apply for the Capacity Building Grant.
- Grant Terms: Reduces the term from 24 months to 12 months.
- Application Review Process: Added: OHFA will review the continued eligibility of applicants based on goals and objectives provided in the Strategic Plan for affordable housing. Applicants must demonstrate that funds previously awarded were used in a manner consistent with this plan. OHFA will give consideration to applicants that were unsuccessful in the 2007 application process.

Deleted: Applicants that demonstrate that they have met the goals and benchmarks as committed to in the FY2005 application will be considered for funding.

### **Homeless Assistance Grant Program**

- **Maximum Award Amount:** Note: Requests in excess of the ‘Maximum Award’ listed above may be made if a waiver is submitted to and approved by OHCP by the date and for the reasons stated in the 2008 Homeless Assistance Grant Program application instructions.

### **Housing Assistance Grant Program**

- **Maximum Award Amounts:** Propose changing this requirement as follows: Maximum two-year awards for Emergency Home Repair/Handicapped Accessibility Modifications is \$500,000; and \$150,000 for Down Payment Assistance/Homebuyer Counseling. Requests in excess of \$500,000 for Emergency Home Repair/Handicapped Accessibility may be made if a waiver is submitted to and approved by OHCP by the dates and for the reasons stated in the 2008 Housing Assistance Grant Program application instructions
- **Threshold Requirements:** Propose deleting the requirement that grant applicants must be participating in the Homeless Management Information System (HMIS).
- **Rating Criteria #3, Income Targeting:** (Proposed new language is underlined): Extent to which the project serves low-income persons with household income at or below 35% of AMI for Emergency Home Repair/Accessibility Modifications and/or 65% AMI (with a preference of 50% AMI) for Down Payment Assistance/Homebuyer Counseling.
- **Eligible Activities:** Proposed to be revised as follows with new language underlined:
  - Emergency home repair/accessibility modifications that if not corrected could pose a threat to the health or safety of the occupants. Limit of assistance - \$5,000 per unit. Income targeting to households at or below 35% Area Median Income (AMI).
  - Down Payment Assistance – limit of assistance - \$3,000 (limited to 3% of purchase price plus out of pocket expenses). Income targeting to households at or below 65% AMI with a preference to persons at or below 50% AMI.
  - Homebuyer Counseling – pre- and post-purchase counseling must be tied to Down payment Assistance program. Income targeting to households at or below 65% AMI with a preference to persons at or below 50% AMI.

### **Housing Opportunities for Persons With AIDS Program**

- In the section “Grant Ceiling” the adjustment factor used to compute the maximum grant request was changed to 1.10 (from 1.15) for rural (non-HOPWA entitlement counties).

### **Community Development Program**

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

For Formula communities, OHCP will consider the already submitted CAS as the long-term plan of the community until they submit a new plan in 2014. For 2008, a CAS is only required if a new project will be funded in a new investment area.

- **CAS Expenditure Requirement:** This requirement is proposed to be eliminated.

**Water and Sanitary Sewer Program**

No changes are proposed for FY 2008.

**Microenterprise Business Development Program**

No changes are proposed for FY 2008.

**Comprehensive Downtown Revitalization Program**

No changes are proposed for FY 2008.

**Economic Development Program**

No changes are proposed for FY 2008.

**Discretionary Grant Program**

The deadline for OHTF Discretionary Grants was moved to April 1, 2008 (from April 14 in 2007)

**New Horizons Fair Housing Assistance Program**

No changes are proposed for FY 2008.

**Table 1: FY 2008 Consolidated Plan Program Summary**

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 <sup>(2)</sup>	Federal ESG	Federal HOPWA	State OHTF <sup>(3)</sup>
Community Housing Improvement Program <sup>(2)</sup>	\$24,988,515	18.9%	\$23,188,515	29.4%	\$7,500,000	\$15,688,515			\$1,800,000
Housing Development Assistance Program <sup>(3)</sup>	\$27,500,000	20.8%	\$7,500,000	9.5%		\$7,500,000			\$20,000,000
CHDO Competitive Operating Grant Program <sup>(4)</sup>	\$1,000,000	0.8%	\$1,000,000	1.3%		\$1,000,000			
Homeless Assistance Grant Program <sup>(5)</sup>	\$21,382,500	16.2%	\$2,980,000	3.8%			\$2,980,000		\$18,402,500
Housing Opportunities for Persons With AIDS	\$1,108,000	0.8%	\$1,108,000	1.4%				\$1,108,000	
Housing Assistance Grant Program	\$6,000,000	4.5%	\$0	0.0%					\$6,000,000
<b>Housing, Shelter and Support Subtotal</b>	<b>\$81,979,015</b>	<b>62.1%</b>	<b>\$35,776,515</b>	<b>45.3%</b>	<b>\$7,500,000</b>	<b>\$24,188,515</b>	<b>\$2,980,000</b>	<b>\$1,108,000</b>	<b>\$46,202,500</b>
Community Development Program <sup>(6)</sup>	\$20,400,000	15.5%	\$20,400,000	25.8%	\$20,400,000				
Water and Sanitary Sewer Program	\$9,500,000	7.2%	\$9,500,000	12.0%	\$9,500,000				
<b>Community Development Subtotal</b>	<b>\$29,900,000</b>	<b>22.7%</b>	<b>\$29,900,000</b>	<b>37.9%</b>	<b>\$29,900,000</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
Economic Development Program	\$5,800,000	4.4%	\$5,800,000	7.3%	\$5,800,000				
Comprehensive Downtown Revitalization Program	\$2,500,000	1.9%	\$2,500,000	3.2%	\$2,500,000				
Microenterprise Business Development Program <sup>(6)</sup>	\$600,000	0.5%	\$0	0.0%	\$0				\$600,000
<b>Economic Development Subtotal</b>	<b>\$8,900,000</b>	<b>6.7%</b>	<b>\$8,300,000</b>	<b>10.5%</b>	<b>\$8,300,000</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$600,000</b>
Discretionary Grant Program	\$1,997,500	1.5%	\$800,000	1.0%	\$700,000	\$0	\$100,000		\$1,197,500
New Horizons Fair Housing Assistance Program <sup>(7)</sup>	\$0	0.0%	\$0	0.0%	\$0				
Training and Technical Assistance Funds	\$465,600	0.4%	\$305,600	0.4%	\$305,600				\$160,000
Community Development Finance Fund	\$1,890,000	1.4%	\$0	0.0%					\$1,890,000
Resident Services Coordinator Program	\$315,000	0.2%	\$0	0.0%					\$315,000
Administration <sup>(8)</sup>	\$6,519,030	4.9%	\$3,884,030	4.9%	\$1,055,168	\$2,668,719	\$160,143	\$0	\$2,635,000
<b>Totals =</b>	<b>\$131,966,145</b>	<b>100%</b>	<b>\$78,966,145</b>	<b>100%</b>	<b>\$47,760,768</b>	<b>\$26,857,234</b>	<b>\$3,240,143</b>	<b>\$1,108,000</b>	<b>\$53,000,000</b>

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

(2) The CHIP allocation includes \$170,042 of HOME funds set aside for the ADDI.

(3) OHTF allocations are contingent upon approval by the OHTF Advisory Committee. Further, OHTF grant awards are contingent upon Controlling Board approval. OHFA will administer the HDAP and ODA will administer the Resident Services Coordinator Program. Therefore, in addition to program funds, OHFA will receive HOME and OHTF administrative dollars and ODA will receive OHTF administrative dollars. In addition, the allocation of OHTF dollars is contingent upon approval of the Ohio Biennium Budget.

(4) OHFA will administer the CHDO Competitive Operating Grant Program.

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

(6) The Community Development Program includes the funding allocation for the Formula Allocation, Neighborhood Revitalization, and CDBG Microenterprise Business Development grants.

(7) The New Horizons Fair Housing Assistance Program will be funded with dollars from previous years' CDBG allocations.

(8) Approximately 50% of the HOME and 60% 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 2005 Consolidated Plan and 2005-2009 Consolidated Plan Strategy. Because most of these grants continue for one or two years, the data for the performance indicators is based on the projected outcomes that were stated in the grant application and grant agreement. While these outcomes may vary to some extent from the actual outcomes, historically the variation has been negligible. Therefore, OHCP has determined that it is of more value to begin the process of performance measurement based on this information than wait for two years or more when the grants are completed and actual outcome data is available. As the actual grant data becomes available, the historical performance data will be adjusted so that a more accurate historical performance record can be established, which will allow a more accurate comparison to be made with long-term goals, particularly the extent to which the 2005-2009 Consolidated Plan Strategy was successfully implemented. Where possible, the 2005-2009 Consolidated Plan Strategy included numeric goals and the performance measures can be compared to those goals to monitor the state's progress in meeting them.

Regarding long-term goals, it should be noted that the federal HUD funding has been declining for several years, including a 12.3% decline in CDBG and HOME funds allocated to the state during 2004-2006 alone. Yet, during the last few years, costs have continued to escalate due to a variety of factors. Hurricane Katrina and other natural disasters have increased the cost of construction materials, and the imposition of lead-based paint requirements have increased the cost and complexity of residential rehabilitation, while extending the production timeframe. In such an environment, it becomes increasingly difficult to attempt to measure performance in light of long-term production goals, because the factors and assumptions the goals are based upon are continually changing. Apart from the long-term production goals, the performance measures and indicators still have value in that they illustrate the nature and extent of the impacts of the state's HUD-assisted programs on Ohio's communities and residents.

Note that there is a HUD-required performance measure report for the Housing Opportunities for Persons with AIDS Program, which is included in this section. This report does not follow the exact format as the other program reports.

## ***CHIP Performance Measures***

***Year: 2006***

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

### **Objectives:**

### **Performance Measures:**

Objective 1: Preserve affordable owner and renter housing for lower-income households by bringing the housing unit up to program standards and codes, eliminating hazards and deficiencies in major systems, and reducing maintenance cost.	Owner units brought to standard	402
	Renter units brought to standard	91
	Households unable to be assisted	
Objective 2: Eliminate lead-based paint hazards through the application of interim control measures based on a risk assessment followed by a clearance examination.	Units made lead-safe and passed clearance test	655
Objective 3: Improve affordability by reducing housing operating costs through energy efficiency improvements.	Units made more energy efficient	N/A
Objective 4: Improve accessibility to housing persons with disabilities by making modifications to dwelling units.	Units modified to improve accessibility for disabled persons	N/A
Objective 5: Expand housing opportunities for LMI households, by providing assistance that will enable them to acquire appropriate affordable housing that meets program and local standards.	New affordable units added to the housing stock	75
	Homebuyers Assisted	170
	Family Households of 3 or more persons assisted to acquire units with 3 or more bedrooms	154
	Large Family Households of 5 or more persons assisted to acquire units with 4 or more bedrooms	14
	Number of affordable unit years created	
	Renters assisted with rental assistance payments	254
	Households not assisted due to credit problems or other issues	N/A
Objective 6: Prevent homelessness and address immediate threats to health and safety caused by emergency housing issues, such as roof, plumbing, heating or electrical systems, or need for temporary housing assistance payments.	Households assisted with temporary housing payments	197
	Units Repaired for Immediate Health/Safety Threats	706
Objective 7: Provide supportive housing counseling services to assist lower-income households with acquiring or maintaining housing.	Persons or Families given housing counseling	50

***Housing - Housing Development***

***Year : 2006***

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

Objectives:

Performance Measures:

Objective 1: Expand affordable rental housing opportunities for lower-income persons and families in Ohio by using HOME funds to provide gap financing in conjunction with other funding sources, including Ohio Housing Credits, to fund approximately 30 projects and create about 1,200 units of affordable rental housing units annually.	Number Affordable Units Created:	826
Objective 2: Create long-term affordable housing opportunities for residents of rental housing.	Number of Affordable Housing Projects Assisted:	17
Objective 3: Expand rental opportunities for very low-income households by targeting families earning at or below 35% AMGI.	Number of unit-years of affordable housing created:	24,720
Objective 4: Establish linkages between projects and local supportive services agencies	Number of households at or below 35% of area median income to benefit from affordable, HOME-assisted housing:	83
Objective 5: Reduce housing costs by 10% for lower-income families by encouraging energy-efficient units that also provide universal design features.	Number projects that will better serve residents through linkages with support service agencies:	8
Objective 6: Encourage the development of housing that serves households with MR/DD, Severe and Persistent Mental Illness or Mobility/Sensory Impairments.	Number of lower-income households that will experience reduced housing costs of 10% or more through energy-saving / universal design features:	824
Objective 7: Encourage energy-efficient units that also provide universal design features.	Number of households with special needs that will be served by affordable housing units assisted with HOME funds:	82
Objective 8: Continue to review and refine the application process, minimizing barriers to accessing the program.	Number of households that will benefit from HOME-assisted units that incorporate universal design and/or energy efficient features:	824
Objective 9: Use housing resources to improve the quality of living for low- to moderate-income households and provide housing for residents of Ohio with special needs.	Number of comments received from advisory groups meetings:	0
	Number of low- or moderate-income households that will benefit from HOME-assisted projects with community service linkages, energy saving or universal design features and/or that serve special needs households:	824

**Housing - Community Housing Development Organizations**

**Year: 2006**

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

**Objectives:**

**Performance Measures:**

Objective 1: Offer continued support for eligible existing grantees that meet agreed upon benchmarks and milestones in the production of affordable housing.	Total CHDOs	32
	CHDOs meeting benchmarks and goals	32
	Number of affordable projects produced by CHDOs	9
	Number of affordable units produced by CHDOs	306
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Objective 2: Expand the program to include Sustaining Grants to CHDO's with service areas located in City/County Participating Jurisdictions.	Number of PJ CHDOs meeting production goals	13
	Percent of PJ CHDOs meeting production goals	13
	Number of projects produced by PJ CHDOs	6
	Number of units produced by PJ CHDOs	106
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Objective 3: Offer Capacity Building Grants to CHDO's new to the program.	Number of new non-PJ CHDOs meeting goals	1
	Projects by new non-PJ CHDOs	0
	Units by new non-PJ CHDOs	0

**Community Development Program  
Performance Measures Report**

**Program Year: 2006**

**Community Development Summary Data**

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

Objective 1: Assist Ohio cities and counties with addressing local community development needs by making grant awards to 80 counties and 49 cities in Ohio.

Measures 1:	Total funds distributed to local communities =	\$21,792,000
Measure 2:	Total number of activities funded (excludes administration) =	619
Measure 3:	Number of people benefiting from funded activities =	7,554,197

Objective 2: Revitalize neighborhoods and improve the quality of life for residents, by addressing all or part of the identified community development needs and/or housing needs in 100 areas annually.

Measure 1:	Number of Investment Areas Impacted by CDBG revitalization activities:	232
Measure 2:	CDBG-funded improvements that address identified needs in local Investment Areas:	315
Measure 3:	Persons benefiting from CDBG activities in Investment Areas :	413,104
Measure 4:	Low- and moderate-income persons benefiting from CDBG-funded Investment area activities :	240,124
	Total CDBG Funds in Activities in Investment Areas :	\$13,421,600
	Other Funds :	\$22,496,979

Objective 3: Address basic health and safety issues by constructing and or upgrading ing basic water and sanitary sewer infrastructure to comply with standards established by the EPA.

Measure 1:	Communities assisted new or upgraded or water or sanitary sewerage systems that comply with EPA	21
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Objective 4: Address basic health and safety needs of low- and moderate-income persons, neighborhoods and communities.

Measure 1:	Number of communities assisted with fire protection equipment:	33
Measure 2:	Number of persons in communities benefiting from improved fire protection equipment or facilities:	68,958
Measure 3:	Number of low or moderate-income persons benefiting from improved fire equipment or facilities:	40,837

Objective 5: Improve the quality of life for elderly persons and special needs populations by providing locally determined public services and facilities.

Measure 1: Persons assisted by public services by type of service provided:

<u>Public Service Provided</u>	<u>Beneficiaries</u>
Youth Programs and Services	65
Services for Disabled Persons	2,555
Services for Elderly Persons	120
Family and Individual Counseling	35
Medical and Nutrition Programs	400
Homeless and D.V. Services	2,350
Other Types of Services	82

Objective 6: Improve the quality of life for elderly persons and special needs populations by providing locally determined public services and facilities.

Performance Measures:	Number of Senior Centers improved or constructed:	9
	Number of elderly persons benefiting from construction or improvements to senior centers:	25,878

Objective 7: Maintain the cultural heritage of local communities through Historic Preservation activities.

Measure 1:	Local Historic Structures Preserved:	3
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**Economic Development Program Performance Measures**      **Program Year : 2006**

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

Objective 1: Create/retain 750 jobs and at least 400 jobs for LMI persons.

Performance Measures:	Number of communities provided with economic development grant assistance =	20
	Number of people whose jobs were created or retained as a result of CDBG-assisted economic development projects =	876
	Number of jobs created/retained for low- or moderate-income persons =	503

Objective 2: Provide CDBG assistance such that the average total cost per job created/retained is \$10,000 or less.

Performance Measure:	Average annual cost per job =	\$8,048
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Objective 3: Maximize participation of other resources such that projects leverage at least \$10 of other funds for \$1 CDBG funds (\$10 : \$1 leverage ratio)

Performance Measure:	Annual leverage ratio (other funds : CDBG funds) =	\$35.8 : \$1
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Objective 4: Improve the economic health and sustainability of local communities by adding to the tax base and local economy through expansion or retention of the existing businesses.

Performance Measures:	(a) Annual local income tax revenue:	\$409,081
	(b) Annual local corporate tax revenue:	\$479,304
	(c). Annual property tax revenue:	\$600,473
	Total (a-c) Additional local tax revenues generated annually =	\$1,488,858
	Projected additional dollars expended in the local economy annually* =	\$13,750,464

\*The impact of additional dollars is based on total projected payroll minus taxes (assumed to be 20%) and a 10% savings rate, and that each payroll dollar will turnover in the community about 1.4 times.

Objective 5: Increase the number of high-value business and jobs (high-technology/manufacturing) in local communities.

Performance Measure:	High-value businesses created, expanded or retained =	14
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Objective 6: Provide training and financial support to prospective business owners to facilitate the creation of new businesses.

Performance Measure: New businesses created = 5

Objective 7: Support the revitalization and rejuvenation of neighborhoods and communities, particularly areas with economic needs, through investment in new or existing businesses.

Performance Measures: Number of businesses located in :

ODOD-designated distressed area =	5
Locally-designated Enterprise Zone =	14
Central business district revitalization area =	0
Low-income neighborhood or community =	5

Objective 8: Support the creation and retention of business providing “living wage” jobs.

Performance Measures: Number and percent of jobs that are created or retained that exceed 150% of the poverty level = 666 76.0%

Number and percent of jobs created or retained that provide employee health benefits = 848 96.8%

**Downtown Revitalization Program Performance Measures Report      2006**

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

**Objectives:**

**Performance Indicators:**

Objective 1: Provide assistance to communities to revitalize Central Business Districts

Performance Measures:      Number of Central Business Districts Assisted =      6

Objective 2: Eliminate blighting conditions by rehabilitating buildings and facades located in areas that have been designated as distressed based on HUD criteria.

Performance Measures:      Number of buildings rehabilitated =      117

Percent of buildings rehabilitated =      30.5%

Objective 3: Eliminate blighting conditions by upgrading infrastructure in the designated downtown revitalization areas.

Performance Measures:      Streets improved or reconstructed (linear feet) =      2,108

Sidewalks improved or reconstructed (linear feet) =      3,678

Items installed as part of streetscaping (utility lines/poles, street lighting, benches, etc.) =      107

Parking Spaces constructed:      22

Objective 4: Leverage private and public funds for building and infrastructure improvements in the downtown revitalization area:

Performance Measures:      Other funds leveraged =      \$15,257,097

Objective 5: Improve or stabilize the business climate downtown.

Performance Measures:      \*Average decline in vacant floor space downtown =      Data NA

\*Increase in the number of businesses downtown =      Data NA

\*Increase participation in merchants/business association =      Data NA

Objective 6: Expanded or stabilized employment opportunities downtown.

Performance Measures:      \*Estimated increase in the number of jobs in downtown revitalization areas =      Data NA

Objective 7: Preserve the cultural and architectural heritage of local downtowns in Ohio.

Performance Measures:      \*Number of historic building or sites that have been preserved =      Data NA

## Report on Homeless Performance Measures

Year : 2006

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

Objective 1: Provide support to local agencies to provide emergency homeless shelters for persons and families needing temporary housing.

Performance Measures:	Number shelters assisted	92
	Number persons or households provided shelter	75,502

Objective 2: Transition homeless individuals and families from shelters to appropriate non-emergency housing opportunities as soon as possible and feasible.

Performance Measures:	Average length of stay previous report year (nights)*	0
	Average length of stay latest report year (nights)*	0

Objective 3: Where appropriate, assist homeless individuals and families with temporary transitional housing with the goal of moving into permanent housing.

Performance Measures:	Number assisted with transitional housing*	0
	Percent assisted with transitional housing*	0

Objective 4: Move homeless families and persons into permanent housing situations.

Performance Measures:	Number moved to permanent housing*	0
	Percent assisted with permanent housing*	0
	Number in permanent housing after 2 yrs*	0
	Percent in permanent housing after 2 yrs*	0
	Number moved to permanent housing with services*	0
	Percent moved to permanent housing with services*	0
	Number in permanent housing with services after 2 yrs*	0
	Percent in permanent housing with services after 2 yrs*	0

\*These performance measures are being redesigned for the FY 2008 Consolidated Plan and FY 2007 Annual Performance Report.

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

Year: 2006

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

**HOPWA Performance Chart 1 -- Planned Goal AND Chart 2 -- Actual Performance.**

HOPWA Grantee: State of Ohio Report Period: 07/01/2006 to 06/30/2007

Types of Housing Units dedicated to Persons with HIV/AIDS which were Supported during the Operating Year	Outputs Households				Funding e. HOPWA Budget	Funding f. HOPWA Actual	Funding g. Leveraged
	HOPWA Asst.		Non-HOPWA				
	a. Goal	b. Actual	c. Goal	d. Actual			
1. Tenant-Based Rental Assistance:	0	0	0	0	\$ 0	\$ 0	\$ 0
2. Units in Facilities Supported with Operating Costs: (Number of Households Supported)	56	30	0	0	\$ 55,000	\$ 54,947	\$ 226,891
3. Units in Facilities Dev. with Capital Funds and Placed in Service during the Program Year:	0	0	0	0	\$ 0	\$ 0	\$ 0
4. Short-term Rent, Mortgage & Utility Payments	819	781	0	0	\$ 413,300	\$ 410,322	\$ 67,415
<b>Hsg Dev. (Construction &amp; Stewardship of Facility Based Hsg) Output Units</b>							
5. Units in Facilities being Developed with Capital Funding but not yet opened	0	0	0	0	\$ 0	\$ 0	\$ 0
6. Stewardship Units of Housing Subject to 3- or 10- year use Agreements:	0	0	0	0	\$ 0	\$ 0	\$ 0
7. Adjustment to Eliminate Duplication	0	0	0	0	\$ 0	\$ 0	\$ 0
Total Unduplicated Number of Households/ Units of Housing Assisted	875	811	0	0	\$ 468,300	\$ 465,269	\$ 294,306
<b>Supportive Services Output Households</b>							
8. i) Supportive Services in Conjunction with HOPWA Housing Activities:	624	0	0	0	\$ 343,800	\$ 345,961	\$ 554,489
ii) Supportive Services not in Conjunction with HOPWA Housing Activities:	349	880	0	0	\$ 127,300	\$ 127,839	\$ 270,767
9. Adjustment to Eliminate Duplication:	0	0	0	0	\$ 0	\$ 0	\$ 0
Total Supportive Services:	973	880	0	0	\$ 471,100	\$ 473,800	\$ 825,256
<b>Housing Placement Assistance</b>							
10. Housing Information Services:	65	0	0	0	\$ 14,000	\$ 13,999	\$ 8,000
11. Permanent Housing Placement Services:	0	0	0	0	\$ 0	\$ 0	\$ 0
Total Housing Placement Assistance:	65	0	0	0	\$ 14,000	\$ 13,999	\$ 8,000
<b>Housing Development, Administration, and Management Services</b>							
12. Resource Identification	XXXXXXX	XXXXXXX	XXXXXXX	XXXXXXX	\$ 0	\$ 0	\$ 0
13. Grantee Administration (Maximum 3% of Total)	XXXXXXX	XXXXXXX	XXXXXXX	XXXXXXX	\$ 4,000	\$ 4,000	\$ 0
13. Project Sponsor Admin. (Maximum 7% of Total)	XXXXXXX	XXXXXXX	XXXXXXX	XXXXXXX	\$ 66,600	\$ 66,590	\$ 241,225
Total Costs for Program Year:	XXXXXXX	XXXXXXX	XXXXXXX	XXXXXXX	\$ 1,024,000	\$ 1,023,659	\$ 1,368,787

(Continued on next page)

**Housing Opportunities for Persons With AIDS Program  
Performance Measures and Indicators – (continued)**

**Performance Chart 3 -- Measuring Housing Stability Outcomes**

HOPWA Grantee: State of Ohio Report Period: 07/01/2006 to 06/30/2007

Type of Housing Assistance	(1) Total Number of Households Receiving HOPWA Assistance	(2) Number of Households Continuing	(3) Number of Exited Households Component and Destination
Tenant-Based Rental Assistance	0	0	1. (Emergency Shelter) = 0 2. (Temporary Housing) = 0 3. (Private Housing) = 0 4. (Other HOPWA) = 0 5. (Other Subsidy) = 0 6. (Institution) = 0 7. (Jail/Prison) = 0 8. (Disconnected) = 0 9. (Death) = 0
Facility-Based Housing Assistance	30	-61	1. (Emergency Shelter) = 0 2. (Temporary Housing) = 1 3. (Private Housing) = 88 4. (Other HOPWA) = 0 5. (Other Subsidy) = 0 6. (Institution) = 0 7. (Jail/Prison) = 0 8. (Disconnected) = 0 9. (Death) = 2
Short-term Housing Assistance	Total Number of Households Receiving HOPWA Assistance	Of the Total Number Households Receiving STRMU Assistance this Operating Year	Status of STRMU Assisted Households at the end of Operating Year
Short-term Rent, Mortgage, and Utility Assistance	781	215	1. (Emergency Shelter) = 0 2. (Temporary Housing) = 0 3. (Private Housing) = 0 4. (Other HOPWA) = 0 5. (Other Subsidy) = 0 6. (Institution) = 0 7. (Jail/Prison) = 0 8. (Disconnected) = 0 9. (Death) = 0
		What Number of those Households Received STRMU Assistance in the Two Prior Operating Years (ago)	
		237	1. (Emergency Shelter) = 0 2. (Temporary Housing) = 0 3. (Private Housing) = 0 4. (Other HOPWA) = 0 5. (Other Subsidy) = 0 6. (Institution) = 0 7. (Jail/Prison) = 0 8. (Disconnected) = 0 9. (Death) = 0

## Responses to Comments on the Draft FY 2008 Ohio Consolidated Plan

### Comment:

A community expressed concern about their reduction in the CDBG Formula Grant allocation, noting that their 2007 allocation was less than in 2006, while costs have increased.

### Response:

OHCP recognizes the importance of CDBG funds to local communities and the difficulty in addressing important needs because of increasing costs. However HUD's CDBG allocation to the State of Ohio has been reduced steadily over the past several years because of the continued decrease in federal funding of the CDBG program. Since 2001, the State of Ohio's CDBG allocation has been reduced by \$9.5 million, which is a 16.6% decrease. For federal Fiscal Year (FY) 2008, Ohio's CDBG allocation will be \$1.5 million less than in 2007, which is a 3.1% decrease in funding. This decrease in our state CDBG allocation will necessitate a reduction in funding among all of the FY 2008 programs that utilize CDBG funds, which will include reductions in annual funding provided to communities through the Community Development Program Formula Grants.

### Comment:

A special category should be established within the Housing Assistance Grant Program (HAGP) that would provide funds for lead abatement to units with funds to be distributed through a third party agency to lower-income households who have received Lead Hazard Control Orders and who live in communities without access to resources, such as federal Lead Hazard Control Grant funds.

### Response:

OHCP agrees that there is a need to assist households under Lead Hazard Control Orders, however, OHCP has been informed that legislation is being considered that would commit TANF funds for this purpose. In any case, it is too late in the planning process for the FY 2008 Consolidated Plan to initiate such a major change to the HAGP. Such a change would need to have been discussed at least during the Program Advisory Committee meetings held during October, 2007. Additionally, because the Ohio Housing Trust Funds are the source of funding for the HAGP, the OHTF Advisory Committee probably would need to be consulted.

### Comment:

There is a need for additional funding for the CHDO Operating Grant Program because far more well-performing CHDOs needed funding in 2006 and 2007 than was available. There is an increased need to address the number of foreclosed and vacant housing in Ohio and to produce new affordable housing units.

### Response:

The purpose of the Community Housing Development Organizations (CHDOs) Operating Grant Program is to support the development of viable non-profit organizations that meet the CHDO definitions prescribed by HUD and have the capacity to develop housing projects, and, particularly projects that receive HOME Investment Partnership Program funding. The HOME program requires the state to commit at least 15% of its annual allocation for CHDO projects. The state Currently there are 32 CHDOs throughout the state receiving CHDO Operating Grant assistance on an ongoing basis. Based on the FY 2006 Annual Performance Report, 9 produced successful projects, which is 28%. At that rate, it would take over three years for each CHDO to develop a successful project, which is quite a long time period. Providing operating grant assistance to more CHDOs necessarily would increase the number of CHDO projects competing for these funds, which are not anticipated to increase. In fact, due to reductions in federal funding, Ohio's HOME allocation from

HUD has decreased by \$6.4 million (19.4%) since 2002. Ohio's FY 2008 funding is \$1.35 million less than 2007, which is a decrease of 4.8%. Thus, increasing the number of CHDOs receiving operating grant funding would not create any appreciable increase in viable housing projects, but rather would have the effect of decreasing the production levels of each CHDO, which would negatively impact the overall performance measures for the program.

It may very well be true that there are "well performing CHDOs" that do not receive CHDO operating grant assistance, but that is not a valid basis for increasing funding. The questions that need to be examined are whether (1) there are a sufficient number of viable CHDO organizations for the state to meet the required threshold that 15% of HOME funds be committed to CHDO projects; (2) there is adequate geographic coverage across the state to assure that sufficient capacity exists to produce housing projects equitably with respect to the need; and (3) CHDOs receiving operating grant assistance are performing at an acceptable level of production to warrant continued operating support. OHCP and OHFA believe that the answer to the first two questions is "yes", and that the existing pool of CHDOs receiving operating grant assistance at its current level of \$1,000,000 is adequate to meet the demand for fundable HOME-assisted CHDO projects. With regard to the third question, OHFA continues to monitor the extent to which individual CHDOs are meeting production goals, or whether change need to be made to the existing pool of CHDOs receiving operating grant assistance.

**Comment:**

There is a need for more flexibility in the HDAP Gap financing Program, in particular that site control requirements for single family rehab project be relaxed so that holding costs may be managed.

**Response:**

The Ohio Housing Finance Agency (OHFA) appreciates your feedback on its singlefamily development program. OHFA is looking for ways to minimize the risks assumed by the development community, and maintaining site control in the current economic environment clearly poses a level of risk. OHFA is currently working on revising its site control requirements for homeownership projects, which should minimize this risk while still encouraging applicants to move quickly through the development process.

**Comment:**

More assistance should be provided from ODOD and OHFA for rehabilitation and demolition of vacant properties, both residential and commercial.

**Response:**

With respect to demolition of vacant properties, a number of programs are available through OHCP that permit demolition of vacant properties, including the Community Development Program, which allows demolition of residential, commercial or other type of structures both through Formula Grant and Neighborhood Revitalization Grants. A total of \$642,000 was expended through these grants in 2006 to demolish 64 structures. Any of the 43 cities and counties that receive a direct Community Development Block Grant (CDBG) allocation from HUD can use those funds for demolition (or housing rehabilitation) if they so choose. Also, Housing and economic development funds can be used to demolish structures when such an activity is necessary prior to site development or construction.

All of the CDBG, HOME, OHTF and Tax Credit programs can be (and often are) used for rehabilitation or repair of residential properties. The Downtown Revitalization program and CDBG Economic Development Program can be used for rehabilitation of commercial properties.

The obstacle to committing more funding for any of these activities is that the HUD funding received by Ohio has been declining for several years. Since 2001, the State of Ohio's CDBG allocation has been reduced by \$9.5 million, which is a 16.6% decrease. For federal Fiscal Year (FY) 2008, Ohio's CDBG allocation will be \$1.5 million less than in 2007, which is a 3.1% decrease in funding. Ohio's HOME allocation from HUD has decreased by \$6.4 million (19.4%) since 2002. Ohio's FY 2008 funding is \$1.35 million less than 2007, which is a decrease of 4.8%. Unless this trend is reversed, it will be unlikely that there can be an increase in funding for rehabilitation or demolition activities.

**Comment:**

ODOD could improve the functionality of Individual Development Accounts (IDA) if it would allow microenterprise programs to use a portion of the loan funds in the Microenterprise Business Development Program (CDC Program and possibly the CDBG Program) for account match. Microenterprise programs are more easily adapted to the state's grant periods than homeownership programs. They need less funding for start-up than a household needs to save for homeownership and they do not need to do the same level of credit repair as homeownership.

**Response:**

ODOD appreciates the comments on allowing the Individual Development Accounts (IDA) to be incorporated into the Microenterprise Business Development Program. This issue needs to be discussed as part of the CDBG Program Advisory Committees which are conducted in the fall. ODOD will not include this recommendation as part of the FY 2008 Program since all the issues pertaining to IDA should be addressed with the Microenterprise Advisory Committee first.

**Comment:**

Several comments were received suggesting that OHCP encourage more communities and CHIP grantees to offer a tenant based rental assistance program (TBRA), so that this resource could be used to move people from institutions back into the local community. Some comments suggested establishing a pilot rental assistance demonstration program for this purpose.

**Response:**

Tenant-based rental assistance has been eligible through the CHIP since its inception in 1992 and will continue to be an eligible activity in FY 2008. Communities could use tenant-based rental assistance to aid the transition persons with disabilities into the community. During the last reporting year of 2006, local CHIP grantees committed about \$1.2 million for rental assistance to approximately 250 lower-income households, which indicates that rental assistance is currently being offered in a number of local CHIP communities. OHCP expects that this activity will continue to be funded at about this level in FY 2008, though this is dependent on local community needs and priorities.

One of the difficulties in using the TBRA through the CHIP for a Pilot Rental Assistant Program is that the CHIP grants are for 2 years duration and there is no guarantee that the community will apply for or will receive a subsequent grant, or that the community will want to continue the TBRA activity. The only alternative to the CHIP would entail establishing and staffing an entirely new program, including a new funding distribution mechanism, requiring establishing system for training, application review, monitoring, reporting and a number of other issues. OHCP simply does not currently possess the administrative capacity to implement such a program. Moreover, the state's HOME funds are intended to primarily serve the non-participating jurisdiction areas of the state, so the other 23 HOME city and county grantees in the state would need to commit a portion of their HOME funds to establish such a rental assistance program on a state-wide basis.

Adding to this problem is that Ohio's HOME funding, along with that of other communities, has decreased by \$6.4 million (19.4%) since 2002, and the 2008 funding is \$1.35 million less than 2007, which is a decrease of 4.8%. This amount is greater than all of the rental assistance funds awarded through the CHIP in 2006. While persons could be transitioned into the community using state HOME TBRA funds, relying on these funds for long-term support or indefinite period of time involves a significant degree of uncertainty and may be putting these persons in a precarious situation. Another difficulty is that transitioning persons from an institution to the community very likely will require that support services be provided, both during the transition and for some period of time afterward, if not permanently.

A comprehensive state-wide approach is needed to appropriately address transitioning persons from institutions to communities, and such an approach is already in progress. You may be aware that the State of Ohio has received a "Money Follows the Person" or MFP grant, the main goal of which is to transition persons from institutions to communities. Mechanisms to coordinate this effort among state agencies and stakeholders have been established to implement this grant. The Ohio Department of Job and Family Services ODJFS has convened an Interagency Steering

Committee to coordinate MFP activities among those agencies involved in MFP planning and implementation, including: the Department of Aging (ODA), the Department of Alcohol and Drug Addiction Services (ODADAS), the Department of Health (ODH), the Department of Mental Health (ODMH), the Department of Mental Retardation and Developmental Disabilities (ODMR/DD), and the Office of Budget and Management. The MFP Planning and Advisory Committee brings together key stakeholders to advise and guide the program's planning and implementation.

Certainly there may be a role local CHIP communities can play in support of the implementation of the MFP grant by assisting some persons in transitioning from institutions to community settings, such as granting a year of TBRA funding to them while permanent rental assistance is arranged. However, OHCP does not believe it would be productive to establish a separate pilot program for tenant-based rental assistance, when that activity is already an eligible activity under the CHIP. An approach other than the CHIP, would require taking increasingly scarce resources from existing programs, such as CHIP or HDAP, adversely affecting the people needing housing assistance through those programs. It would also entail creating and staffing a complex and entirely new program that, without other local HOME grantee participation, would serve only the non-metropolitan area of the state. It would also require a long-term, and growing, commitment of funding from a decreasing and uncertain source of funds.

**Comments:**

Several comment were received suggesting that communities be encouraged to establish rental rehabilitation programs and home repair programs that could be used to make housing unit more accessible, particularly so that persons from institutions could transition from institution back into the community.

**Response:**

Many communities have established rental rehabilitation and repair programs, which has been an eligible activity since the inception of the CHIP in 1992. During the most recent reporting year, over \$1.7 million was committed through the CHIP for rental rehabilitation and repair, benefitting nearly 100 households, and \$2.5 million was expended through the Housing Development Assistance Program (HDAP) for rental rehabilitation projects benefitting 243 households. While exact figures are not available, certainly some of these funds were used for accessibility modifications.

OHCP has encouraged local communities to establish rental rehabilitation programs, and has even offered incentives for this purpose. However, the CHIP was established to allow communities to develop their own local plans, priorities and activities based on local needs and capacities, and also to avoid creating a myriad of housing programs to address each type of need. OHCP has required all communities to establish a Housing Advisory Committee to provide input to developing the CHIS, to assure that all housing needs are being considered. Ultimately it is the decision of each local community to determine which activities it will pursue, though OHCP determines if an application should be awarded funds.

**Comment:**

The proposed modification to the review criteria for the CHIP would require communities to target funds to a particular geographic area would disadvantage the Appalachian area of the state and is not a sensible strategy for rural areas. In rural areas there is not enough population to justify targeting \$100,000 to housing while greater housing needs may exist outside of target areas. Also the requirement that we must leverage 20% of the housing funds for infrastructure improvements in the target area changes the nature of the CHIP, and forces the community to commit CHIP funds where there is the greatest need for infrastructure improvements, as well as funding available for such improvements, rather than where the greatest housing need is located. Townships and villages in rural areas are not putting in new sidewalks, many places have water and new roads are not being built but there is a need in these communities for housing rehabilitation. I urge you to reconsider implanting a targeting approach, which was tried in the old Comprehensive Housing Program concept and abandoned.

**Response:**

First, it is important to note that targeting of funds is not required. Full ranking points may be obtained in this section of the review by giving priority to individuals living within the target area through the community's ranking system, as opposed to actually targeting funds to the target area. However, it is our hope that communities will take a sincere interest in the revitalization of small villages and neighborhoods within their communities and will seek to conduct this targeting in a way that will make a real difference for these communities.

The Office of Housing and Community Partnerships (OHCP) has the following reasons for encouraging community revitalization through the targeting of funds within the CHIP:

- It is important for housing programs to consider not only the effect of their efforts on individual households, but to also consider the effect of these efforts on the economic vitality and well being of the community as a whole.
- A greater impact can be made within a community by developing partnerships with other agencies working within the community, by leveraging various funding sources and other resources, and by developing partnerships with the members of the community themselves.
- By concentrating these various resources and partnerships to conduct work within a specific area, that we can make a discernable difference in the community, and that this difference will often lead to additional private investment and effort towards community improvements.

The comments compare this targeting requirement with the old Comprehensive Housing Program. However, there are some very real and significant differences between the former program and the current efforts.

- First, in the old Comprehensive Housing Program, all of the funds were targeted. This left no resources to address other issues that may arise on a community wide basis. The current CHIP requirements only require targeting of a small portion of funds, which leaves considerable funding to address other issues within a community.
- Second, in many cases, the amount of funds was more than could reasonably be spent within the limited time frame. The amount of funds required to be spent through CHIP within a targeted area is much smaller. This makes it much more likely to be achievable.
- Third, the old Comprehensive Housing Program did not place enough emphasis on planning and marketing, which is a required component through the current CHIP.

The comments mention that the problem is that “when you are working in rural Appalachian townships and villages generally there is not enough population in such a small area to justify targeting \$100,000 to housing”. However, OHCP believes that there is more than enough population to support this approach. To cite an example, in the most rural area in your county, there are four villages with populations ranging from 305 to 1676. Even the smallest and wealthiest of these has 146 housing units, 57 of the owner occupied houses in this village are valued at less than \$50,000. 88 of these houses were built prior to 1940. 48 of the households living in the village have incomes below \$15,000. If only half the village is included in the target area, that is 73 total housing units. With the planning and marketing that OHCP requires to garner community support (which OHCP will pay for, by the way, through up to \$10,000 in planning money through the grant), it should be relatively easy to find three owner occupied low income units in need of rehabilitation among these 73 houses (3 rehabilitations X \$30,000 average costs + the \$10,000 in planning money = \$100,000). Not to mention that there are a number of other options for activities that may be conducted within this target area in place of the private owner rehabilitation, including rental rehabilitation, acquisition/rehabilitation/resale, and new construction.

The comments also mention that “there may be houses in greater need that go undone”. Remember that these are \$500,000 grants. If the \$100,000 plus the full allowable administration request is taken from this amount, it still leaves \$340,000 to spend within the other areas of the county. The population of the four villages is equal to about 22% of the total county population, and the \$100,000 targeted to one of these villages is equal to about 23% of the available CHIP funds, minus the full allowable administration and the HFH supplement. Therefore, it is likely that at least this much of the CHIP money would be spent in these villages in any case. Targeting simply would concentrate the funds in specific

neighborhoods so that it has more impact. Also keep in mind that three of these villages have household median incomes below the county average, so people living in these communities would be even more likely to need assistance than people outside of these areas.

The comments note that we must leverage 20% of the housing dollars in infrastructure improvements to the target area. Actually, it is not a percentage, but a minimum dollar amount that is required to get full points. The dollar amount is \$20,000 (which is 20% of \$100,000, but if a community chooses to target additional funds, they are still only held to \$20,000 in other funds.) Also, while infrastructure is one option as a source of other funds, there are many other options. For example, we would count program income or funds provided as a match for rental rehabilitation or habitat for humanity projects. We would also suggest that when planning for both infrastructure and housing needs, that it makes sense to think about these in the larger context of how they will impact the community as a whole, and that it often makes sense to tie some of these funds together. We are not necessarily talking about sidewalks. However, we suspect that there may be a need for sewer improvements in some of these villages. Also, remember that Formula grant funds can be spent on housing activities as well as infrastructure.

For all of the above reasons, we believe that this is very workable, even in the most rural areas of the State, and that it does not disadvantage the Appalachian areas of Ohio. Hopefully, we have demonstrated that we have given considerable thought to the effects of this change, and that we have discussed this at length internally, with various grantees, and formally through the advisory committee process. OHCP will also review the success and workability of this process as it is implemented by communities across the state, and in particular, as it relates to very rural communities. Based upon this review, OHCP will make adjustments to its program, as necessary.

As an aside, OHCP is also altering the way that it calculates the distress points, which will result in additional points awarded to the more distressed areas of the state. The net result should be that the Appalachian areas of Ohio will fare better than in the past in comparison to the other areas of the state.

**Comment:**

The requirement that the home owner's income be at or below 35% of the Area Median Income (AMI), makes this money hard to utilize. Many home owner's at or below 35% AMI that require modifications are behind in their property taxes, behind in their mortgage payments, behind in their property insurance (or the insurance has lapsed), and are behind in many other home repairs needed, all of which disqualify them for this grant. Is there a specific reason that the home modifications monies has such a low income requirement when other programs, such as HDGF and OHTF Discretionary Grants, allow 50 - 80% AMI? People with disabilities needing home modification are more likely to have major outstanding medical bills than someone needing down payment assistance. Is it possible to raise the income requirement for home modifications to the same level as the down payment assistance and Discretionary Grants?

Under the Housing Assistance Grant Program, accessibility modifications have a limit of assistance of only \$5,000.00 and income of at or below 35% Area Median Income. The cost of purchasing and installing a stair-glide can cost over \$7,000.00. The cost of a first floor bathroom can be over \$10,000.00. The difference in cost would need to come from the low-income family, which in 99% of situations, would not be possible. Raising the income guidelines, or raising the limit could make a significant difference in utilizing these funds for their intended purpose.

There is a tremendous need for sources of funding for accessibility modifications for rental properties. This would mean that more Ohio Citizens with disabilities will be able to remain in their homes and save the Ohio Medicaid Program the \$6,000.00 a month per individual it costs to reside in a nursing home or assisted living facility. Also this would be beneficial for the Ohio Department of Jobs and Family Service's Money Follows the Person (MFP) demonstration grant called HOME Choice (Helping Ohioans Move, Expanding Choice) and the Olmstead Decision Ohio Access Success Project. These programs provide monies for people with disabilities to transition out of nursing homes back into the community, but the accessible, affordable housing isn't readily available at the exact time these programs have the monies available. Having resources to create accessibility of existing rental homes and apartments, would allow more individuals the opportunity to utilize these programs.

I attend several Homeless Services Collaborative and Continuum of Care meetings in three counties. All three counties have very limited emergency shelters and homeless shelters. These shelters have been unable, and in some cases unwilling, to address the needs of people with disabilities. The removal of "Public Residential Rehabilitation, including Shelters for Special Needs Populations" as an eligible activity under CHIP, may exacerbate this problem. ODOD should develop policies to assure the existence of local emergency preparedness plans that address the needs of people with disabilities of all ages including those who use oxygen or have service animals.

The first sentence of the Goal of the Homeless Assistance Grant Program states "to provide a continuum of housing/services to prevent persons from becoming homeless by providing homelessness prevention services and assistance", yet there are no performance measures listed to indicate how many individuals and families received this assistance. If the first sentence of the goal is focused on prevention, shouldn't the first measurable objective be focused on prevention as well? For people with disabilities, prevention assistance can mean remaining in their home or apartment instead of being institutionalized. Isn't preventing homelessness or institutionalization more cost efficient?

OHFA has mandated Visitability in all new construction and provided incentives for developers to include universal design features. ODOD should adopt these same policies which would create additional housing choices. This would also assist the ODOD in complying with certifying that the funds are being used to "Affirmatively Further Fair Housing".

**Response:**

The commenter indicated that the restriction of 35% median income limit for OHTF assistance provided through the Housing Assistance Grant Program makes these funds difficult to utilize because many potential clients in this income group are frequently in default on their mortgages and other obligations and that there is a need to assist families in the 50-80% of median income range as well.

The legislation that created the OHTF, as reflected in the Ohio Revised Code (ORC), includes specific beneficiary targets, including the requirement that 75% of the funds must be used for affordable housing and housing assistance for families and individuals with incomes at or below 50% of the area median income, and that "in making grants, loans, loan guarantees, and loan subsidies under this section, the department and the agency shall give preference to viable projects and activities that benefit those families and individuals whose incomes are equal to or less than thirty-five per cent (35%) of the median income for the county in which they live". Thus, for each OHTF dollar that is expended to assist a client with an income in excess of 50% of median income, three OHTF dollars must be expended to benefit persons below 50% of median income, with preference given to persons below 35%. The Housing Assistance Program emergency repair activity incorporated this income targeting restriction so that the department overall would be in compliance with both of these requirements.

The observation that some OHTF programs allow assistance to persons at 50-80% of median income is correct, but these programs are purposely limited in scope to assure that they will not exceed 25% of the overall funding. If the income restriction for OHTF emergency repair was increased to 50%, it may result in most or all of the beneficiaries being over 35% of median income, which would not comply with the ORC benefit requirements. Although the Housing Development Assistance Program (HDAP) projects assisted with OHTF funds undoubtedly include households with income below 35% of median income, it would be exceedingly difficult to structure these projects such that they reserved a certain percentage of units exclusively for households in the 0-35% income category. Consequently, the Housing Assistance Grant Program has been used as the best mechanism to achieve the 35% median income benefit requirement.

However, it may be possible to adjust the assistance limits for the Housing Assistance Grant Program such that accessibility modifications could be made to a limited percentage of units that would benefit households with incomes up to 50% of median income. Such an adjustment could address the needs you mentioned while assuring that overall OHTF expenditures complied with the OHTF benefit requirements. We will explore this further to see if such an adjustment can be made to the program.

The comments mentioned that the limit of \$5000 was not always adequate to address all of the accessibility modifications necessary for some projects. This limit of assistance was established many years ago and is not required by regulation in the ORC. We will consider increasing this limit, particularly in cases of accessibility modifications.

The commenter indicated that the list of Community Housing Improvement Program (CHIP) eligible activities was revised to exclude public rehabilitation, and that this could exacerbate the problem of finding resources that could be used to make emergency shelters accessible. CHIP has received very little interest in this activity over the past several years. Also, the scope of eligible CHIP activities has been reduced in recent years, in part due to the fact that our CDBG and HOME funds have decreased by about \$9 million, or 16%, since 2002, which necessitated narrowing the range of eligible activities to achieve CHIP's primary goal to provide affordable housing to low- and moderate-income households. Note that two of the three counties served by the commenter's agency are Community Development Block Grant (CDBG) Entitlements and Home Investment Partnership (HOME) PJs, so they would be ineligible for the CHIP resources, but your agency could seek to obtain the CDBG funds of the CDBG Entitlement grantees for this purpose.

Among the programs offered through the state's Consolidated Plan program, there are other funding alternatives. For example, the rehabilitation of shelters is an eligible activity through the discretionary program. In the case of Portage County and Ravenna, both communities receive annual CDBG Formula Grant funding. The Formula Grants can be used to fund any CDBG-eligible activity, including public rehabilitation. Also, communities have established local Revolving Loan Funds which allows them to retain program income, which can be expended for eligible activities. While program income is intended to be used for the same activity that generated the income, if qualifying projects are lacking, then funds can be used for any eligible activity. As of the most recent annual report, Portage County and Ravenna have a cumulative program income balance of about \$1 million. If either of these communities would like to utilize a portion of their program income for public rehabilitation, they should contact OHCP.

Finally, the comments mentioned that the goal of the Homeless Assistance Grant Program is preventing persons from becoming homeless by providing homeless prevention services and assistance, yet there are no performance measures listed to indicate how many families receive this assistance. The performance measures are designed to be indicators of what the programs and activities are achieving, not a comprehensive description of all activities, outcomes and beneficiaries. A comprehensive description of all program activities and beneficiaries is contained in the FY 2006 Annual Performance Report, which is available on the ODOD's website located at <http://www.odod.state.oh.us/cdd/ohcp/publications.htm>. As stated in the Consolidated Plan Executive Summary, the performance measures for the Homeless Assistance Grant Program are being revised for future reporting, and we will consider including a performance measure on homeless prevention activities.

The commenter mentioned the Ohio Housing Finance Agency's (OHFA's) visitability policy and suggested that the Ohio Department of Development (ODOD) adopt such a policy. While ODOD is not opposed to the concept of visitability, the policies that apply to the Consolidated Plan do not apply to all of ODOD programs. ODOD would need to evaluate the impact of such a policy on all ODOD program before such a policy could be applied department-wide. Also, the visitability concept is more appropriately applied to new housing construction where accessible design features can be integrated into a project prior to construction. OHFA handles the vast majority of new construction projects, whereas almost all of the programs administered by OHCP, such as CHIP, involve rehabilitation, repair or acquisition of existing housing. Although accessibility modifications are made to such units when appropriate for the occupants, applying visitability design features throughout would very likely cause the costs of rehabilitation for many projects to exceed maximum per-unit cost limits, making them infeasible. We need to be very careful about such unintended consequences of policies that could negatively affect housing preservation activities and other programs.