

Executive Summary

AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

This Action Plan outlines housing, community and economic development needs, priorities, strategies, and projects that will be undertaken by the City of Middletown with the funds that the City receives from the U.S. Department of Housing and Urban Development (HUD). As an entitlement community, the City receives an annual share of federal Community Development Block Grant (CDBG), and through the Butler County HOME Consortium, Home Investment Partnership (HOME) funds. In order to receive its CDBG entitlement, the City must submit this Third Year Annual Action Plan to HUD. The funds are intended to provide lower and moderate-income households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, development activities, public services, economic development, planning, and program administration.

2. Summarize the objectives and outcomes identified in the Plan

In program year 2017, the City of Middletown will utilize available funding including CDBG, NSP, NSP3, and HOME in a results-oriented approach. In addition, a large focus will be given to the next round of State issued demolition grants to demolish vacant and blighted residential housing in the City. Like the current 2016 program year, a significant portion of CDBG funding will be used in PY2017 for proactive code enforcement. Code enforcement staff will conduct a minimum of 4,000 inspections.

The City is budgeting \$50,000 of PY2017 CDBG funds for emergency home repairs. This will assist an estimated 30-50 low-income homeowners and be administered through a local non-profit called People Working Cooperatively. The City remains committed to affirmatively furthering fair housing and is budgeting CDBG funds for fair housing services through Housing Opportunities Made Equal (fair housing testing and assistance - \$5,000 budgeted – estimated 15 people served) and Legal Aid of Greater Cincinnati (legal representation for low-moderate income households with fair housing issues, foreclosure prevention, and tenant/landlord disputes - \$15,000 budgeted – estimated 10 new clients served). We will budget \$17,500 in program year 2017 for residential rehab and partner with the non-profit S.E.L.F. to provide the free labor. We have also budgeted \$41,000 to expand evening programming to the Robert 'Sonny' Hill Jr. Community Center operated by the non-profit Community Building Institute. This programming will offer the local community additional quality of life activities that will vary from day to day. The City will also budget \$46,000 for the Middletown Area Senior Center to replace the Center's kitchen equipment that is utilized to provide meals for vulnerable older adults aged 65 and older. In 2016 The Middletown Senior Center provided 137,654 home delivered, and on and offsite congregate meals.

3. Evaluation of past performance

The City of Middletown continued to utilize code enforcement as a priority in PY2016. In addition, the City worked to sell recently rehabbed homes through NSP3 to low income families and continued demolition of blighted, abandoned housing through the Neighborhood Improvement Program grant. We continued sub recipient funding to People Working Cooperatively for emergency repairs for low income households. The balance of funding was utilized by other local non-profits to provide legal and fair housing services in our community. The City accomplished the following in program year 2016:

- Served 55 low income households with emergency repairs through the non-profit, People Working Cooperatively.

- Served 38 households with fair housing complaints and investigations through the non-profit, Housing Opportunities Made Equal (H.O.M.E.).

- Served 38 households with legal issues involving tenant/landlord disputes, foreclosures, and fair housing complaints.

- Completed 6,678 code enforcement inspections (includes re-inspections) of which 2,080 were resolved voluntarily and 3,297 were resolved contractually.

In addition, the City was able to partner with additional non-profits to make improvements to their public facilities. We retain a heavy focus on the demolition of blighted, vacant, abandoned housing throughout the City.

4. Summary of Citizen Participation Process and consultation process

It is a good practice to consult with local housing agencies when preparing the Annual Action Plan. Butler Metropolitan Housing Authority is aware of the City's Consolidated Plan goals and strategies and each year's Action Plan priorities. We have a strong working relationship with Butler Metropolitan Housing Authority.

The City takes every feasible effort to broaden public participation and reach out to minorities, non-English speaking persons, and individuals with disabilities. Please see the citizen participation plan which includes a televised public hearing and copies of the proposed plan placed at the public library, the senior citizen center, at the Community Revitalization Department in the City building, and on the City's web page. The plan was available

for input in person, at local community outlets and online to reach the broadest possible audience. Copies were available to take for later reading and comment. No comments were received.

The Middletown City Council held a public hearing to obtain citizen views and respond to citizen proposals:

Public Hearing: February 21, 2017	Published in Middletown Journal Paper: 2/7 and 2/9, 2017 via legal ad	City Council Chambers
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The **30-day Public Comment Period** ran from **February 9th, 2016 through March 11th, 2017**. The City of Middletown will consider any comments or views of citizens received in writing, or orally at the public hearings, in preparing the final consolidated plan.

5. Summary of public comments

No comments were received.

6. Summary of comments or views not accepted and the reasons for not accepting them

No Comments were received

7. Summary

See previous response.

PR-05 Lead & Responsible Agencies - 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	MIDDLETOWN	Community Revitalization
HOME Administrator	MIDDLETOWN	Neighborhood Housing Services of Hamilton

Table 1 – Responsible Agencies

Narrative

The Community Development Division of the Community Revitalization Department is the lead agency for the completion of the Consolidated Plan and the implementation of the Annual Action Plan, as well as the responsible party for the processing and distribution of federal funds under the CDBG program, once allocated by the federal government and approved by the City Council.

Other offices and agencies responsible for executing and administering programs covered by the Consolidated Plan include the City’s Department of Financial Services, Building Inspections, Code Enforcement, Parks and Recreation, Capital Improvement Program, and Planning and Zoning.

Consolidated Plan Public Contact Information

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AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

The development of this Action Plan included public hearings as well as consultation with public and private agencies that provide assisted housing, health services, mental health services, and social services. Community and economic development entities were also consulted.

It should also be noted that City staff members serve on various committees concerned with the needs of special populations in the County. Through this on-going involvement, the City is aware of housing and health needs and has provided various programs to meet such needs. These programs have included housing rehabilitation for elderly households, and support for various homeless and transitional housing programs.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

The Balance of State Continuum of Care (BOSCO) is comprised of the 80 rural counties in Ohio, covers all regions of the state, and represents diverse populations, needs, and capabilities. The Ohio Department of Development, Office of Housing and Community Partnerships (ODOD) and the Coalition on Homelessness and Housing in Ohio (COHHIO) serve as the lead agencies for the BOSCO.

To better facilitate local coordination and planning efforts, BOSCO members have also formed city, county, or multi agency county Continua of Care (CoC). These local CoCs address community level planning, identify service gaps, and plan and prioritize new and renewed homeless assistance projects. However, to compete for federal funding available through the Continuum of Care Homeless Assistance Programs, local CoCs in these 80 counties participate in the BOSCO.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The Butler County Housing and Homeless Coalition will apply for and receive funding on behalf of the coalition through the Balance of State Continuum of Care process.

Homelessness: Objectives identified in the Middletown strategic plan are to review the proper level of section 8 vouchers to assist low income or homeless individuals and families in securing safe and affordable housing and coordinate with local and regional governments and service agencies to provide technical assistance for homeless service providers. This is accomplished county-wide through the

coalition. The Butler County Housing and Homeless Coalition is a wide ranging group of municipalities and non-profit providers working in coordination on homelessness. The members include the City of Hamilton, the City of Middletown, Butler County, Butler County Children's Services Board, Butler Metropolitan Housing Authority, Butler Behavioral Health-Workplace Associates, Legal Aid, Lifespan, Neighborhood Housing Services, Inc., S.E.L.F., Sojourner Recovery Services, Transitional Living, Faith Works, Inc., Hope House, Mercy Franciscan at St. Raphael, Serve City, the YWCA, the VA, and Butler County Success. This group provides multiple services to area homeless including not only shelter, but also transportation, employment, mental health, and substance abuse services. The VA has become more active reaching out to veterans and matching needs with services. The major obstacles to completing these steps are funding.

Chronic Homelessness: Butler County, including Middletown, have consistently low numbers of unsheltered individuals and families documented in the point in time counts. The City of Middletown, in conjunction with regional partners in the Butler County Housing and Homeless Coalition will continue to provide outreach and appropriate social services to assist the homeless. The Butler County Housing and Homeless Coalition administers Shelter Plus Care vouchers to get chronically homeless individuals housed. Butler County administers additional Shelter Plus vouchers to assist Butler County chronic homeless.

Homeless Prevention: Services offered to residents of Middletown and Butler County include the Emergency Money Fund administered through St. Raphael. There are also funds available for emergency rent and utility payment through SELF, the local Community Action Program (CAP) agency. Additionally, Butler Metropolitan Housing Authority (BMHA) has a working relationship with Transitional Living who provides mental health assessment and permanent housing placement services.

Discharge Coordination Policy: Activities planned to implement a community-wide discharge policy begin with the Butler County Housing and Homeless Coalition. Homeless providers serving not just Middletown, but the entire county meet monthly and are developing a community-wide policy.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

N/A

2. Agencies, groups, organizations and others who participated in the process and consultations

Butler County Homeless & Housing Coalition: Services – homeless; homeless needs – chronically homeless, families with children, veterans, unaccompanied youth; homelessness strategy

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	PEOPLE WORKING COOPERATIVELY
	Agency/Group/Organization Type	Community Services
	What section of the Plan was addressed by Consultation?	Community Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Application and Inquiries
2	Agency/Group/Organization	HOUSING OPPORTUNITIES MADE EQUAL
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Application and Inquiries
3	Agency/Group/Organization	SELF (SUPPORTS TO ENCOURAGE LOW-INCOME FAMILIES
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Application
4	Agency/Group/Organization	NEIGHBORHOOD HOUSING SERVICES OF HAMILTON
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Programs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Application and Inquiries

Identify any Agency Types not consulted and provide rationale for not consulting

To the best of its ability, the City has been in contact with all known agencies and organizations involved in activities that are relevant to CDBG, HOME, and ESG activities and programs.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		

Table 3 - Other local / regional / federal planning efforts

Narrative

As noted above, the City coordinates with a range of public entities, including the Planning, Health and Economic Development offices of Butler County and a number of State agencies in the development and execution of a range of programs and activities

AP-12 Participation - 91.401, 91.105, 91.200(c)

**1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

The City considers the involvement of its low- and moderate-income residents to be essential to the development and implementation of its Annual Action Plans.

As noted in PR-10, Consultation, well publicized public hearings were held on two occasions – in the Community Revitalization Department Conference Room in City Hall, One Donham Plaza, and on at a City Council meeting. These sessions were part of a concerted effort to obtain as much public input as possible in the course of Plan preparation.

The City ensures that all Public Hearings are held at times and locations convenient to potential and actual beneficiaries and with accommodations for persons with disabilities. Upon request, in advance of the meeting, the City will attempt to make accommodations for those individuals in need of special assistance. The City also provides technical assistance workshops for all interested in the programs.

The Citizen Outreach Participation Table below provides details about the various outreach efforts.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	None Received	None Received	None Received	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
2	Newspaper Ad	Non-targeted/broad community	None Received	None Received	None Received	
3	Internet Outreach	Non-targeted/broad community	None Received	None Received	None Received	
4	Plan is available at local library and senior center.	Non-targeted/broad community	None Received	None Received	None Received	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.420(b), 91.220(c) (1, 2)

Introduction

The City of Middletown, like many communities, is faced with the challenging task of meeting increasing needs with fluctuating and/or decreasing federal and state resources.

The figures shown in the table below reflect HUD's current allocations. The figure for "Expected Amount Available Remainder of ConPlan" anticipates level funding using the 2014 allocation amounts and projecting those amounts over the four remaining years covered by the Consolidated Plan.

If there are further funding cuts to CDBG over the coming years, the City will adjust accordingly and craft Annual Action Plans reflective of funding realities.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	670,261	0	0	670,261	0	

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City administration recognizes that the City's annual entitlement and formula allocations are not sufficient to meet all of its needs, and that leveraging resources is critical to achieving the City's goals. The City continues to cultivate funding partners who can match the City's investment of CDBG funds. Additional funds need to be raised to ensure that more affordable housing is available for those in need.

To that end the City seeks funds from the County, the State and grants from other entities, both public and private. In particular, the City has worked closely with the Butler County Office of Community Development as a member of the County's Home Investment Partnership (HOME) Program. The City has historically solicited applications for owner-occupied rehabilitation projects for referral to the County program. The City has been successful in leveraging significant funds from the State Demolition Grant Program and will continue this effort.

Matching requirements have been satisfied with other eligible financial resources and/or in-kind services, and the City will continue to seek this type of matching as well as financial matches.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

In cooperation with Butler County, the City is part of the Butler County Land Bank. Middletown's intention is to utilize the land bank to acquire vacant lots and properties to use for resale, demolition, or possible rehabilitation.

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Revitalization	2015	2019	Affordable Housing	CD Target Areas	Provide Safe, Affordable Housing Opportunities	CDBG: \$65,000	Rental units rehabilitated: 50 Household Housing Unit
2	Neighborhood Revitalization	2015	2019	Affordable Housing	CD Target Areas	Clearance and Demolition	CDBG: \$369,209	Buildings Demolished: 10 Buildings
3	Public Services	2015	2019	Non-Housing Community Development	CD Target Areas	Public Service Programs, especially for the Elderl	CDBG: \$20,000	Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted
4	Fair Housing	2015	2019	Non-Housing Community Development	CD Target Areas	Fair Housing	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted
5	Public Facilities Improvements	2015	2019	Non-Housing Community Development	CD Target Areas	Public Improvements/Infrastructure, including stre	CDBG: \$87,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted
6	Homeless Activities	2015	2019	Homeless	CD Target Areas	Homeless Activities	CDBG: \$0	Homeless Person Overnight Shelter: 250 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Economic Development	2015	2019	Non-Housing Community Development	Citywide	Economic Development	CDBG: \$0	Businesses assisted: 5 Businesses Assisted

Table 6 - Goals Summary

Goal Descriptions

1	Goal Name	Housing Revitalization
	Goal Description	Housing Revitalization – Emergency home repairs, home rehabilitation
2	Goal Name	Neighborhood Revitalization
	Goal Description	Code enforcement, demolition; neighborhood improvements
3	Goal Name	Public Services
	Goal Description	Programs for the elderly, youth, and persons with disabilities
4	Goal Name	Fair Housing
	Goal Description	Fair Housing programs and services; support for legal aid
5	Goal Name	Public Facilities Improvements
	Goal Description	Repairs and Improvements to public facilities
6	Goal Name	Homeless Activities
	Goal Description	Homeless prevention, emergency shelters, transitional housing though no projects will be funded in 2015.

7	Goal Name	Economic Development
	Goal Description	Façade programs, loan programs, technical assistance, though no projects will be funded in 2017

Table 7 – Goal Descriptions

AP-35 Projects - 91.420, 91.220(d)

Introduction

The development of the Annual Action Plan involved consultation with those agencies involved in delivering housing and housing services within Middletown. Meetings and discussions were held between the staff of the City's Community Revitalization Department and other City Departments, as well as conducting meetings with appropriate housing and social service agencies regarding the housing needs of children, elderly persons, persons with disabilities, homeless persons. Public input was also solicited through focus groups, public hearings, and a web-based survey. All projects selected to receive funding meet objectives and goals set by the City to address housing and social needs.

#	Project Name
1	Emergency Repair Program
2	Rehab Program Delivery
3	Fair Housing (H.O.M.E.)
4	Legal Aid of Greater Cincinnati LLC
5	Community Center Programming
6	Senior Center
7	Code Enforcement
8	Demolition
9	Planning and Administration

Table 8 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

These projects are deemed to be of the highest priority and meet the greatest need. The chief obstacle to meeting these needs is a lack of resources to provide a greater level of assistance. All allocation amounts and specific projects have been approved by the Community Revitalization Department staff and the City Council.

AP-38 Project Summary

Project Summary Information

1	Project Name	Emergency Repair Program
	Target Area	City Wide
	Goals Supported	Housing Revitalization
	Needs Addressed	Provide Safe, Affordable Housing Opportunities
	Funding	CDBG: \$50,000
	Description	Emergency Repairs for homeowner units
	Target Date	4/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	50
	Location Description	City Wide for LMI Persons
	Planned Activities	Emergency/minor repairs for low and very low income homeowners
2	Project Name	Rehab Program Delivery
	Target Area	CD Target Areas
	Goals Supported	Housing Revitalization
	Needs Addressed	Provide Safe, Affordable Housing Opportunities
	Funding	CDBG: \$15,000
	Description	Legal costs and program administration of outstanding rehab loans

	Location Description	City Wide for LMI Persons
	Planned Activities	Fair housing counseling, testing, and training.
4	Project Name	Legal Aid of Greater Cincinnati LLC
	Target Area	Citywide
	Goals Supported	Fair Housing
	Needs Addressed	Fair Housing
	Funding	CDBG: \$15,000
	Description	Legal Aid attorneys will use negotiation and civil legal proceedings to help tenants of deteriorated rental property find resolution by making the owners comply with health and housing codes. Legal aid will also provide foreclosure counseling and investigate fair housing violations.
	Target Date	4/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	25
	Location Description	City Wide for LMI Persons
	Planned Activities	Legal Aid will remediate tenant/landlord disputes as well as provide foreclosure prevention counseling and investigation of fair housing violations.
5	Project Name	Community Center Programming
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public Service Programs, especially for the Elderl
	Funding	CDBG: \$41,000

	Description	Provides necessary funding to allow the Community Center to have extended hours in the evening for additional programming and outreach.
	Target Date	4/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	2 new jobs at the Center and an additional 40 individuals at the Center for programming.
	Location Description	City Wide for LMI Persons
	Planned Activities	CBI will hire 2 additional staff focused on developing evening programs that engage local adults and families in quality of life activities and that also builds relationships with local teenagers to provide an alternative to other high-risk activities.
6	Project Name	Senior Center
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public Service Programs, especially for the Elderl
	Funding	CDBG: \$46,000
	Description	Provide funds to replace deteriorate kitchen equipment used to provide meal for elderly at the Senior Center and meals that are delivered.
	Target Date	4/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	1000
	Location Description	City Wide for LMI Persons

	Planned Activities	Offset the operational costs of a bus, such as, gasoline, maintenance, insurance and driver salary.
7	Project Name	Code Enforcement
	Target Area	CD Target Areas
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Provide Safe, Affordable Housing Opportunities
	Funding	CDBG: \$330,345
	Description	Provide Code Enforcement Sevices
	Target Date	8/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	2000
	Location Description	Census tract block groups that are at 51% or above LMI
	Planned Activities	Demolition and clearance of vacant and blighted structures. Provide code enforcement services to ensure all property is kept to local code requirements.
8	Project Name	Demolition
	Target Area	Citywide
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Clearance and Demolition
	Funding	CDBG: \$38,864
	Description	Funds will be used for the demolition and clearance of vacant and blighted properties throughout Middletown
	Target Date	4/30/2019

	Estimate the number and type of families that will benefit from the proposed activities	1
	Location Description	City Wide
	Planned Activities	Demolition and clearance of vacant and blighted structures.
9	Project Name	Planning and Administration
	Target Area	Citywide
	Goals Supported	Housing Revitalization Neighborhood Revitalization Public Services Fair Housing Public Facilities Improvements
	Needs Addressed	Provide Safe, Affordable Housing Opportunities Public Improvements/Infrastructure, including stre Clearance and Demolition Fair Housing
	Funding	CDBG: \$129,052
	Description	General Planning and Administration expenses
	Target Date	4/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	

Planned Activities	Planning and Administration expenses
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AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Geographic Distribution

Target Area	Percentage of Funds
Citywide	50%

Table 9 - Geographic Distribution

There are also designated CD Target areas for code enforcement. These areas were decided on utilizing the income data from HUD resources and income data from the US census. Any block group that was designated at 51% or more LMI is within the target area. Approximately 50% of the CDBG funds will be utilized in these areas.

Rationale for the priorities for allocating investments geographically

Activities will be focused on the City's low-mod block groups and the needs of residents in to those areas. They suffer from high poverty levels, a high number of foreclosed, and vacant and City-owned properties.

The City has worked closely with the public and civic leaders to ascertain the priority needs within the targeted areas. As noted above, these areas emerged in the course of examining the data, but were also frequently mentioned in the course of focus group discussions. These discussions confirmed the already known needs of these areas, complementing or corroborating the data.

Discussion

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

The greatest challenge to meeting underserved needs in the coming year will be meeting the increased need for program activities with a limited amount of funding. To overcome this significant challenge the City will work more efficiently, seek a greater level of collaboration with other agencies and organizations, and aggressively seek opportunities to leverage funds.

Actions planned to address obstacles to meeting underserved needs

The greatest challenge to meeting underserved needs in the coming year will be meeting the increased need for program activities with a limited amount of funding. To overcome this significant challenge the City will work more efficiently, seek a greater level of collaboration with other agencies and organizations, and aggressively seek opportunities to leverage funds.

Actions planned to foster and maintain affordable housing

The City places great emphasis upon seeing that decent, safe affordable housing is available for low-income residents to the extent possible. The City also believes that rehabilitation of both rental and owner housing units is a High priority, as these efforts keep people in affordable housing and, especially for extremely low-income and elderly homeowners, may serve to prevent homelessness. Homeless activities, ranging from providing emergency shelter to preventing homelessness receive a High priority. Thus, the City will focus on multiple efforts including rental rehabilitation, as well as homeowner repair to provide affordable housing and in many instances prevent homelessness.

Actions planned to reduce lead-based paint hazards

Since inception of the CDBG program, all homes older than 1978 scheduled for rehabilitation activities receive lead based paint testing to determine the extent of lead hazards. Lead was found mostly in small amounts such as frames on the doors and was usually on the exterior of the house. All of the lead that was found was addressed by interim controls and abatement through covering and/or painting.

The City will also continue the tasks described in SP-65 the following steps this program year to meet

lead based paint requirements.

Actions planned to reduce the number of poverty-level families

As noted above, the City's anti-poverty strategy is part of a coordinated effort to create jobs and improve the local economy. CDBG provides the core funding for critical basic needs including health, childcare, housing, and transportation because the creation of economic opportunities is not an isolated solution to alleviating poverty. The City works with community partners to identify educational, life skills and training needs and provide opportunities for self-empowerment that will enable low- and moderate-income residents to become and continue to be self-sufficient and economically independent. In particular, the City will support youth training and employment programs that will lead to job opportunities for area residents. These programs have an immediate impact on primary needs of the low-income population and the causes of poverty.

Also, the City will encourage the efforts of the Butler Metropolitan Housing Authority and the Warren Metropolitan Housing Authority, which administer the Section 8 vouchers within the City and the Section 8 Family Self Sufficiency (FSS) program (which teaches self-help skill to low income families with children).

Actions planned to develop institutional structure

Please see the following response.

Actions planned to enhance coordination between public and private housing and social service agencies

The City has identified gaps in institutional structure for implementing the Consolidated Plan and ways to enhance coordination among housing agencies and social service providers. These gaps included a lack of sufficient resources, limited coordination between service providers, and the difficulty of social services agencies in obtaining Middletown specific data. As noted in PR-10, the City has been proactive in addressing these gaps and undertaken a number of specific actions to overcome these gaps.

The City will continue to work closely with Butler County in several areas including social services, lead abatement and mental health services. The City anticipates continued to participation in the Butler County Housing and Homeless Coalition.

The City will continue to seek to establish new relationships with the private sector to accomplish

economic and community development activities.

Discussion

The City of Middletown, Community Revitalization Department, will take the key role for implementation and monitoring its housing and community development projects to ensure long-term compliance with program requirements and comprehensive planning requirements. Community Revitalization staff will conduct monitoring visits with all sub-recipients as needed as well as desk reviews, and financial and performance monitoring on a quarterly basis.

Monitoring of all City operated projects will be done through desk reviews, periodic reviews of the Action Plan and Consolidated Plan, reviews of funding applications, and through compliance with all applicable federal regulations.

Each housing program funded by the City of Middletown will be reviewed for compliance with federal regulations such as Section 504/Handicapped Accessibility, Lead Based Paint requirements, Housing Quality Standards (IPMC), Davis-Bacon, Section 3, and other federal requirements.

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

Discussion

Attachments