



Annual Action Plan

Fiscal Year 2018 – 2019

City of Hamilton
Department of Community Development
Neighborhood Development Division
345 High Street
Hamilton, Ohio 45011

Submit to U.S. Dept. of Housing & Urban Development
Spring 2018



Funding originally designated for Public Facility Improvements(i.e Parks Conservancy) in the amount \$55,000 approved in FY 2018/19 has been amended for Public Facility Improvements for the City of Hamilton Fire Department for an equivalent funding amount.

Executive Summary

Annual Action Plan
2018

5

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Amendment to the Annual Action Plan covers both CDBG and HOME program funded projects for the 2018-2019 Program Year for the period of May 1, 2018 through April 30, 2019.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City of Hamilton has identified the below listed outcomes through the Annual Action Plan Update process:

- Healthy, safe, viable, affordable housing stock;
- Continuum of Care that easily transitions the homeless population to permanent housing;
- Stable, growing permanent employment opportunities for all city residents;
- Public Services that provide assistance to city residents to become more self-sufficient; and
- Public Facility and Infrastructure that addresses and meets the needs of city residents.

As indicated in Section III: Management Process, the City feels strongly that an appropriate and efficient delivery system is in place to carry out the activities identified in the Annual Action Plan.

The City has maintained the necessary and required Community Development Block Grant (CDBG) timeliness ratios; HOME rules on reserved, committed and expended funds have been met. The City continues to desk monitor on a monthly basis and site-visit on an annual basis all sub recipients. New subrecipients may receive two site-visit monitoring sessions during the program year. Subrecipients that have not performed for any reason are evaluated in writing. If non-performing subrecipients cannot or will not meet its agreement obligations, the City terminates its agreement. The City does not allow these subrecipients to apply for future funding until it demonstrates its ability to accomplish obligations. Very rarely has the city had subrecipients who have not complied.

The vast majority of quantifiable evaluation numbers in Integrated Disbursement and Information System (IDIS) have been met. If numbers (goals) are not met, in all cases, justified reasons have been given and accepted by HUD. The City periodically reviews IDIS measures, program goals and overall performance. These reviews are done to ensure that goals, objectives and priorities are being met.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Evaluation of past performance has led the City to the understanding that the development and maintenance of the City's affordable housing stock is imperative to community development and quality of life. The City aspires to continue emergency/minor home repair and housing rehabilitation and also stabilization. The City will continue to work with partner agencies to develop affordable housing units for very low/low income residents. Additionally, the City will continue to clear vacant, unsafe, and blighted residential nuisance properties that adversely impact the health, safety, and welfare of residents.

Evaluation of past performance has also revealed that it is necessary to expand economic development opportunities, focus efforts in public service, and make improvements to public facilities. In regards to economic development the City will support programs that encourage investments, retain and create jobs, revitalize business districts and increase employment-training opportunities. The City will continue to provide access to the Revolving Loan Fund (RLF) to key business and start-up investments. The City focuses its efforts in public service to address the unique needs of low to moderate income (LMI) individuals/families in the jurisdiction. The City understands the continued need to concentrate efforts and funds in fair housing, homeless services, affordable public transportation, youth recreation, and crime victim advocacy. Lastly, the City has found through past performance that there is a need for improvements to public facilities and infrastructure. As a result, the City will commit funds to make public improvements that enhance and compliment the neighborhoods and economic development activities.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Amendment Process:

The City not only follows HUD requirements, but also the locally adopted amendment procedure. The procedure is explained in greater detail below in the "Summary".

Citizen Participation Process for original AAP submission:

The City of Hamilton has worked to create an effective Citizen Participation Process to ensure the appropriate, effective, and comprehensive use of Community Development Block Grant (CDBG) and HOME funds. The City uses a four (4) point approach to engage active citizen participation (conducting a total of 4 public meetings) in the Consolidated Planning process which includes a needs assessment survey, public input meetings, draft Consolidated and/or Annual Action Plan comment period, and finally two (2) public hearings. As a means of attaining the feedback of residents residing in high

poverty/low income areas of the jurisdiction, the City made efforts to conduct meetings in these said income areas (e.g. Alive After 5, Boys & Girls Club, Serve City, and Neighborhood Housing Services).

The City of Hamilton continues to make efforts to ensure that all citizens, regardless of language barriers and physical ability, are provided an opportunity to participate in the formulation of both the Consolidated Plan and Annual Action Plan. These efforts include the following:

1. Public Meeting Notification flyers printed in English and Spanish;
2. Spanish and American Sign Language (ASL) translation available upon request at all public meetings/hearings and;
3. Extensive consultation with Butler County Homeless Coalition in quarterly meetings;
4. Coordination and posting of Public Meeting Notification Flyers in English and Spanish with local service agencies.

Additionally, all facilities, offices and public/semi-public spaces used for citizen participation are fully accessible for those with physical limitation.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Amendment:

The City of Hamilton did not receive any public comments concerning the amendment of CDBG funds designated for Public Facility Improvements. The written comment period for the amendment lasted 30-days and commenced January 26, 2019 through February 26, 2019. The amendment comment period was posted in the local Journal News. On February 27, 2019, the City held the 1st Reading and Public Hearing for the Amendment. On March 13, 2019 the Amendment received final approval by City of Hamilton City Council members.

Original AAP submission:

The City of Hamilton received public comments via Needs Assessment Surveys and Public Input Meetings. Both processes provided diverse yet concise feedback concerning public opinion and needs of the jurisdiction's citizens.

General consensus among data collected via the online and paper Needs Assessment Surveys suggests that Youth Service Programs, Employment/Job Training, Housing Rehabilitation, and Street Repaving/Repair Storm Water (Drainage Improvements) are all Significantly Needed services. While

Child Care Services, Services for Physically Disabled, Services for Developmentally Disabled, Home Accomodations/Modifications, Water/Sewer Improvements, Public Parks and Recreation Facilities, and Neighborhood Business District Improvements are each classified as a Moderate Need.

Written feedback on the Needs Assessment surveys suggests that Street Repaving is a significant need. The following statements were received, "Fix the streets, storm sewers in some areas", "Do some road preservation", and "Roads should be taken care of and paved". As a result of the comments, the City has and plans to continue to commit funds to Street Repaving/Storm Water Repair. Feedback also stated that "our young people do not have enough places to congregate", "kids are bored", and "Hamilton needs more things for teens to do to stay out of trouble". In response to the stated comments, the City of Hamilton plans to commit funds to the Butler County Boys and Girls Club, Greater Miami Valley YMCA (Summer Playground Program and Booker T Washington Programming), and Hamilton Living Water Ministry (which provides after school services to local youth) to benefit the youth in the community. The need for Home Accomodations/Modifications was also specifically mentioned. As a result, the City of Hamilton plans to continue to fund the Neighborhood Development Division's Emergency Minor Home Repair and Housing Rehab.

Feedback collected during the public meetings suggests that Youth Services, Economic Development, and Housing are viewed as Significant Needs. All of which will also be addressed while determining funding allocation (e.g. funds are anticipated to be committed to new home development, Fair Housing Services, Economic Development (RLF), etc.).

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

Original AAP Submission:

After the draft Annual Action Plan was prepared, there is a 30-Day Public Comment Period. A Legal Notice was published and the city website was updated to inform residents and interested parties where the draft 2018-2019 Annual Action Plan was available for public review, including a list of places the draft was available for viewing. The Legal Notice indicating where the draft Annual Action Plan would be available within the community was published on **November 20, 2017** in the Hamilton Journal News. Any public comments received during this period would be responded to in writing within fifteen (15) working days. The draft Annual Action Plan Update was also available for viewing or download from the City of Hamilton website.

The City of Hamilton will provide a timely and substantive response to all written complaints. Upon receipt of a written comment, the City will prepare and forward a written response (including clarification and/or corrective action as needed) and any other related documents will remain on file in

the Community Development Department. Written comments were received during the thirty (30) days Public Comment Period in relation to the **2018-2019** Annual Action Plan Update. Written responses were provided.

7. Summary

Amendment Process:

The City may amend its approved plan whenever it makes one of the following decisions:

- To make a change in its allocation priorities or a change in the method of distribution of funds;
- To carry out an activity, using funds from any program covered by the consolidated plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD), not previously described in the Action Plan; or
- To change the purpose, scope, location, or beneficiaries of an activity.

A **Substantial Amendment** has been defined as and includes the following:

- Major budget adjustment related to financial resources (e.g. reallocation of funds; reimbursements, repayments, recaptures, and/or program income);
- Reallocation of program dollars exceeding 50%;
- A proposed change in the allocation or selection criteria for programs;
- Verbage concerning HOME funds and allocation;
- Addition and/or removal of programs.

The City not only follows HUD requirements, but also the locally adopted amendment procedure. The following adopted procedures will be followed:

- The City will receive an amendment in writing from either a sub-recipient or appropriate staff member. The written amendment will clearly state the reason for the change, the amount of the change, the beneficiary impact as well as any other pertinent information;
- The City will determine whether the amendment request is consistent with the stated and approved local Annual Action Plan and Consolidated Plan;
- The City will make a determination whether to proceed with the proposed amendment;
- The City will publish via social media that an amendment is being considered and where a copy of the written request is available for public review;
- The City will allow a thirty (30) day public comment period; this period will commence upon the date of publication.

The City of Hamilton continues to make efforts to ensure that all citizens, regardless of language barriers and physical ability, are provided an opportunity to participate in the formulation of both the Consolidated Plan and Annual Action Plan. These efforts include the following:

- Public Meeting Notification flyers printed in English and Spanish;
- Spanish and American Sign Language (ASL) translation available upon request at all public meetings/hearings;
- Extensive consultation with Butler County Homeless Coalition in quarterly meetings and;
- Coordination and posting Public Meeting Notification Flyers in English and Spanish with local service agencies.

Additionally, all facilities, offices, and public and semi-public spaces used for citizen participation are fully accessible for those with physical limitations.

Contingency Provisions:

Upon final allocation notification from HUD the City will proportionally adjust one or more proposed activities' budgets according to the increase or decrease from the estimated funding levels to match the actual allocation amounts.

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

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

Describe the agency/entity 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	HAMILTON	Finance Dept./Neighborhood Development Division
HOME Administrator	HAMILTON	Finance Dept./Neighborhood Development Division

Table 1 – Responsible Agencies

Narrative (optional)

The City of Hamilton is submitting an Amendment to the Annual Action Plan for Fiscal Year **2018-2019** in accordance with 24 CFR 91.505. The Amendment to the Annual Action Plan identifies the activities to be funded with Community Development Block Grant (CDBG) resources received during the program year. The amended funds were originally designated for Hamilton Parks Conservancy in the amount of \$55,000, and are now being amended for use by the City of Hamilton Fire Department for station improvements. The City of Hamilton received approximately \$1,420,725.00 in CDBG funds and \$393,338.00 in HOME funds. The City will continue to concentrate its Community Development efforts in four (4) principal areas: Housing, Economic Development, Public Services, and Public Facility Improvements.

Consolidated Plan Public Contact Information

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Hamilton, OH 45011

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The priority needs for the Consolidated Plan and Amendment to the Annual Action Plan are determined by consultation with citizens, social service agencies, housing assistance providers and City Council. The five-year Strategic Plan for Hamilton specifies the types of activities that will be pursued based upon available resources. The highest priority needs in Hamilton include Drug/Substance Abuse Services, Youth Services Programs, Employment/Job Training, Mental Health Services, Crime Awareness/Prevention, and Public Facilities/Infrastructure Improvements. Housing projects in the jurisdiction will be ongoing and other associated projects will continue to be held at a high priority.

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(I))

The City of Hamilton consults with subrecipients, public and assisted housing providers and developers, social service agencies, as well as other government industries regarding coordination efforts in the jurisdiction. The jurisdiction maintains a productive and cooperative partnership with the local housing authority (Butler Metropolitan Housing Authority).

The jurisdiction works cooperatively with the Butler County Housing and Homeless Coalition to ensure priority needs of homeless persons/families and those suffering from mental illness. The jurisdiction has worked to ensure that all aspects of the "Continuum of Care" are being adequately addressed. As a result, the jurisdiction will continue to support aspects of the "Continuum". The City works with local nonprofits that provide direct public services not only including housing assistance but also health, crime reduction, homeless prevention (e.g. Serve City), fair housing (H.O.M.E.) and transportation services (BCRTA).

Local government coordination and cooperation occurs in the form of consultation and project implementation. The City of Hamilton cooperates with Butler and Hamilton counties to obtain accurate information concerning persons with HIV/AIDS and the homeless . Lead-based paint hazard reduction is coordinated with the state of Ohio.Â

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 City of Hamilton works cooperatively with the Butler County Housing and Homeless Coalition to ensure priority needs of homeless persons and families. The City has worked to ensure that all aspects of the "Continuum of Care" are being adequately addressed. The City has

continued to support aspects of the Continuum of Care . Funding of supportive services, emergency/temporary shelter assistance, facilities acquisition and transitional units has and will continue to be done to support the needs of the homeless.

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The City of Hamilton, as a member of the Butler County Homeless and Housing Coalition, has identified the following objectives to assist the homeless:

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1. Create new and permanent beds for chronically homeless persons;
2. Increase the percentage of homeless persons staying in permanent housing;
3. Increase percentage of homeless persons moving from temporary to permanent housing;
4. Increase percentage of homeless persons becoming employed; and
5. Ensure the Continuum of Care has a functional HMIS System.

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

The City of Hamilton is an active participant in the Butler County Housing and Homeless Coalition (BCHHC). The BCHHC has applied and receives funding through the balance of State Continuum of Care process. The City participates in quarterly BCHHC meetings and anticipates continuing to work with the BCHHC and local agencies to develop a community wide policy for discharging coordination. Representatives for the City also maintains a position as an Executive Committee member of the BCHHC.

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2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated



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

The City of Hamilton consulted with organizations and representatives that could provide applicable and experienced feedback concerning the jurisdiction's housing, homeless, development, and support service needs.Â

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	Butler County Housing & Homeless Coalition	Butler County is applying for a renewal grant for additional units of Shelter Plus Care rental assistance to serve chronically homeless single adults with qualifying disabling conditions. Butler County's and the Continuum of Care's efforts align with the jurisdiction's efforts to support and create housing opportunities for homeless and disabled individuals in the community.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Hamilton has and plans to continue to consult with various housing providers, community representatives, service providers, business owners, and citizens during the Consolidated Plan and Annual Action Plan processes.Â

AP-12 Participation – 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 of Hamilton has worked to create an effective Citizen participation Process to ensure appropriate, effective, and comprehensive use of Community Development Block Grant (CDBG) and HOME funds. The City uses a four (4) point approach to engage active citizen participation in the Consolidated Planning process which includes a needs assessment survey, public input meetings, draft Consolidated and/or Annual Action Plan comment period, and finally two (2) public hearings.

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	Needs Assessment Survey - Mail	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad	The City of Hamilton mailed approximately two thousand (2000) randomly selected Needs Assessment Surveys. Approximately two hundred eighty nine (289) surveys were completed and returned at an approximate 14%	The following were recorded as "significant needs": Drug/Substance Abuse Services, Services for the Homeless, Youth Services/Programs, Health Services, Employment/Job Training, Child Care Services, Mental	The City of Hamilton takes into consideration all responses received.	

		community Residents of Public and Assisted Housing	return rate.	Health Services, Services for Physically Disabled, Services for Developmentally Disabled, Crime Awareness/Prevent ion, Services for Battered and Abused Spouses/Children, Transportation Services, Elderly/Senior Services, Emergency Minor Home Repair Programs, Housing Rehabilitation, Sidewalk Repair/Installation, Water/Sewer Improvements, Storm Water/Drainage Improvements, Historic Preservation, Economic Vitality of		
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2	Needs Assessment Survey - Online	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>The City of Hamilton received 34 online responses to the Needs Assessment Survey.</p>	<p>Downtown Hamilton, Improvement of the Visual Appearance of Primary Business Districts.</p> <p>Survey results concluded that the following are of a Significant Need: Drug/Substance Abuse Services, Youth Services Programs, Employment/Job Training, Mental Health Services, Crime Awareness/Prevention, Street Repaving/Repair, Storm Water Drainage) Improvements, and Youth Centers. Additionally, survey results concluded that Quality of</p>	<p>The City of Hamilton takes into consideration all received comments.</p>	<p>https://docs.google.com/a/hamilton-oh.gov/forms/d/e/1FAIpQLSemQ7SwG8Ky0S5hgor9ni_thwq_RGnxMGnGu3lawU_Ww86bNA/viewform</p>
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				Housing is of greater need than Cost of Housing in the jurisdiction. Removal/demolition of unsafe/dangerous		
				abandoned buildings, Economic Vitality, and improvements to the visual appearance of primary businesses, etc. were each listed as a "Very Important" need.		

3	Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>14 individuals participated in providing feedback via a tri-fold poster which afforded the opportunity to place a push pin to identify their highest priority needs in the City of Hamilton.</p>	<p>Feedback collected suggested that Employment/Job Training, Childcare Services, and Youth Services/Programs were the highest priority among those surveyed.</p>	<p>The City of Hamilton takes into consideration all received comments.</p>	
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		Minorities			
		Non-English Speaking - Specify other language: Spanish			
4	Public Meeting	Persons with disabilities	Two (2) City of Hamilton employees were present at the meeting.	No comments were received.	The City of Hamilton takes into consideration all received comments.
		Non-targeted/broad community			
		Residents of Public and Assisted Housing			
5	Public Meeting	Minorities	Nineteen (19) participants and three (3) City of Hamilton staff members were present at the Public Meeting at Neighborhood Housing Services (NHS).	After being separated into groups of four (4), the participants provided feedback suggesting that Economic Development and Housing (e.g. New Construction, Minor Home Repairs, and Rental	The City of Hamilton takes into consideration all received comments.
		Non-English Speaking - Specify other language: Spanish			
		Persons with disabilities			
		Non-targeted/broad			

		community Residents of Public and Assisted Housing		Housing) were the highest priority needs. Individual assessments revealed that the majority of participants rated Drug/Substance Abuse Services, Youth Services/Programs, Services for Developmentally Disabled, Transportation Services, and Youth Centers as Significant Needs.		

6	Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p>	Two (2) participants were present at the public meeting at Serve City.	One (1) participant stated that Homelessness should be considered a the Significant Need. While the other participant stated that Youth Services/Programs should be classified as a Significant Need. Both participants stated that	The City of Hamilton takes into consideration all received comments.	

7	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Public Officials</p>	<p>Planning commissioners approved the Draft FY 2018-2019 Annual Action Plan with the inclusion of one recommendation.</p>	<p>Planning Commissioners recommended that if additional 2018-2019 CDBG funds become available that the City of Hamilton considers utilizing the remaining funds for the Historic Hamilton LLC- Historic Crawford House Restoration project.</p>	<p>The City of Hamilton takes into consideration all received comments.</p>	<p>https://www.hamilton-city.org/AgendaCenter/ViewFile/Agenda/_01162018-756</p>
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8	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>City of Hamilton City Council</p>	<p>Representatives of the City of Hamilton's Finance Department presented the 2018-19 Annual Action to the City of Hamilton City Council and mayor for approval of the Annual Action Plan Update as presented to the City of Hamilton's Planning Commission.</p>	<p>City of Hamilton City Council members made a motion to receive and approve the Annual Action Plan Update as presented to the Planning Commission.</p>	<p>The City of Hamilton takes into consideration all received comments.</p>	<p>https://www.hamilton-city.org/AgendaCenter/ViewFile/Agenda/_02142018-770</p>
9	Public Hearing	<p>Non-targeted/broad community</p>	<p>The amendment of funds was presented before City Council for the 1st Reading on February 27, 2019. The amendment received final approval on March 13, 2019.</p>	<p>City of Hamilton City Council members made a motion to receive and approve the Amendment to the Annual Action Plan.</p>	<p>The City of Hamilton takes into consideration all received comments.</p>	<p>https://www.hamilton-city.org/AgendaCenter/ViewFile/Agenda/_03132019-894</p>

10	Newspaper Ad	Non-targeted/broad community	The City of Hamilton held a public comment period that commenced January 25, 2019 through February 26, 2019.	The City did not receive any comments concerning the amendment of funds.	The City of Hamilton takes into consideration all received comments.	
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Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Hamilton has utilized Community Development Block Grant (CDBG) in the approximate amount of \$1,420,725 and HOME entitlement funding in the amount of \$393,338.15 for fiscal year 2018-2019. The City proposed to maintain its Housing Rehabilitation program through its established Revolving Loan Fund (RLF). The City will continue to work with a local CHDO to provide down-payment and closing cost assistance to qualified persons. The City will continue to work with local non-profit organizations to create housing units for those moving from local shelters into permanent housing. The City also continues to work with non-profit organizations to develop affordable housing units for extremely low-income residents.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		

CDBG	public - federa l	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,420,725	54,623	0	1,475,348	0	Program Income includes estimated housing and commercial revolving loan funds.
HOME	public - federa l	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	393,338	15,004	0	408,342	0	
General Fund	public - local	New construction for ownership Other	49,167	0	0	49,167	0	Estimated at 12.5% Match for HOME funds

Table 1 - 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 Department of Community Development continues to broaden and strengthen relationships with appropriate agencies and other City of

Hamilton departments to implement physical improvements, special code enforcement and public services that benefit very low and low to moderate income city residents. Through these relationships, the City will work to provide emergency/minor home repairs to eligible low-income homeowners as well as remove and clear dangerous, dilapidated and vacant buildings.

The objectives of the CDBG and HOME programs include the revitalization, preservation, conservation and redevelopment of neighborhoods; stimulating economic development; and providing public improvements, which principally benefit persons of low and low-moderate income.

The 12.5% HOME Match will be satisfied from the City's General Funds.

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

The City of Hamilton operates a Landbank Program. Through the program the City may donate landbank property to nonprofit organizations for the development of affordable housing.

Discussion

N/A

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Clearance and Demolition	2017	2021	Non-Housing Community Development	Urban Renewal Area Low/Moderate Income Areas All HUD eligible areas within the City of Hamilton	Clearance and Demolition	CDBG: \$143,171	Buildings Demolished: 3 Buildings Housing Code Enforcement/Foreclosed Property Care: 5000 Household Housing Unit Other: 250 Other

2	AFH Goal 1: Location/Type of Affordable Housing	201 7	202 1	Affordable Housing Public Housing	All HUD eligible areas within the City of Hamilton	AFH Factor 1: Location/t ype of affordable housing	CDBG: \$265,840 HOME: \$398,512	Homeowner Housing Added: 1 Household Housing Unit Homeowner Housing Rehabilitated: 75 Household Housing Unit Direct Financial Assistance to Homebuyers: 6 Households Assisted
3	Public Facilities/ Improvements	201 7	202 1	Non- Housing Communit y Developm ent	Urban Renewal Area Low/Mode rate Income Areas All HUD eligible areas within the City of Hamilton	Public Facilities Public Improvem ents	CDBG: \$557,729	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 31000 Persons Assisted

4	Public Services	2017	2021	Non-Housing Community Development	Urban Renewal Area Low/Moderate Income Areas All HUD eligible areas within the City of Hamilton	Public Improvements Public Services AFH Factor 7: Transportation	CDBG: \$209,560	Public service activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted
5	Economic Development	2017	2021	Non-Housing Community Development	Urban Renewal Area Low/Moderate Income Areas All HUD eligible areas within the City of Hamilton	Economic Development	CDBG: \$13,783	Jobs created/retained: 1 Jobs Businesses assisted: 1 Businesses Assisted
6	Fair Housing	2017	2021	Affordable Housing Public	Urban Renewal Area	AFH Factor 1: Location/t	CDBG: \$8,000	Other: 175 Other

				<p>Housing Homeless Non-Homeless Special Needs</p>	<p>Low/Moderate Income Areas All HUD eligible areas within the City of Hamilton</p>	<p>type of affordable housing AFH</p> <p>Factor 6: Availability of affordable units AFH</p> <p>Factor 7: Transportation AFH</p> <p>Factor 2: Private Discrimination AFH</p> <p>Factor 3: Source of Income Discrimination AFH</p> <p>Factor 4: Impediments to Mobility</p>	
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						AFH Factor 5: Lack of Assistance for Transition ing		
7	Homeless Activities	201 7	202 1	Homeless	Urban Renewal Area Low/Mode rate Income Areas All HUD eligible areas within the City of Hamilton	Homeless Activities	CDBG: \$30,000	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted

9	AFH Goal 7: Transportation	2017	2021	Non-Housing Community Development	Urban Renewal Area Low/Mode rate Income Areas All HUD eligible areas within the City of Hamilton	AFH Factor 7: Transportation	CDBG: \$20,000	Other: 700 Other
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Table 2 – Goals Summary

Goal Descriptions



Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Hamilton's Neighborhood Development Division continues to broaden and strengthen relationships with appropriate agencies and other City of Hamilton Departments to implement physical improvements, special code enforcement, and public services that benefit very low and low to moderate income city residents. Through these relationships, the City will work to provide emergency/minor home repairs to eligible low income homeowners as well as remove and clear dangerous, dilapidated and vacant buildings.

Projects

#	Project Name
1	HOUSING
2	ECONOMIC DEVELOPMENT - DIRECT FINANCIAL ASST. CRLF
3	HEALTH DEPT. SPECIAL CODE ENFORCEMENT, DEMOLITION & CLEARANCE, & REMEDIATION SLUM & BLIGHT
4	PUBLIC FACILITIES & IMPROVEMENTS - 2018
5	PUBLIC SERVICES - 15% CAP
6	NDD CDBG ADMINISTRATION 20% CAP
7	SELF - REHAB AND RESALE FOR HOMEBUYER
8	NDD - HOME ADMINISTRATION 10% CAP
9	NHSH DOWN PAYMENT & CLOSING COST ASSISTANCE 2018
10	CHDO OPERATING EXPENSE - 5% CAP
11	PARTNERSHIPS FOR HOUSING SPECIAL NEEDS RENTAL HOUSING
12	NHSH NEW CONSTRUCTION FOR HOMEOWNERSHIP - 701 N E ST
13	UNPROGRAMMED FUNDS - CONTINGENCY

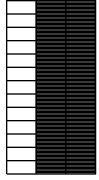
Table 3 - Project Information

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

The objectives of the CDBG and HOME programs include the revitalization, preservation, conservation and redevelopment of neighborhoods; stimulating economic development; and providing public improvements which principally benefit persons of low and low-moderate income.

The HOME Match will be satisfied from the City's General Funds.

AP-38 Project Summary
Project Summary Information



AP-50 Geographic Distribution – 91.220(f)

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

The City of Hamilton has a diverse geographic area consisting of a varying range of income levels and minority groups. Historically, the jurisdiction is split into six (6) wards (1 (North), 1(South), 2, 3, 4, 5, 6 (North), 6 (South). Wards 2, 4, 5, and 6 (North) are the most integrated areas of the jurisdiction. The four (4) wards have populations of Black, Non-Hispanics, Hispanics, and White, Non-Hispanics. The highest population of Black, Non-Hispanics reside in the 2nd ward. The 4th, 5th and 6th (North) wards also possess a very small population of Asian/Pacific Islander, Non-Hispanics.

Results from the City's AFH suggests that individuals/families residing in the 2nd and 4th wards of the jurisdiction are more likely to be exposed to areas of concentrated poverty. The 2nd and 4th wards also possess a greater population of Black, Non-Hispanics and Hispanics.

The above data has prompted the City to continue to focus on projects that benefit individuals/persons residing in areas of the jurisdiction that are segregated (e.g. the City has in the past and plans to continue to commit funds in the 2nd ward to benefit individuals, families, and children) or experience increased levels of poverty.

Geographic Distribution

Target Area	Percentage of Funds
Urban Renewal Area	100
Low/Moderate Income Areas	100
All HUD eligible areas within the City of Hamilton	

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

As part of the Consolidated Plan and Annual Action Plan development, the City determined that it is best to focus the limited FY 18-19 funding resources within target geographical neighborhoods. Maps of the five (5) target areas are included in the appendix of the Consolidated Plan. The five areas and corresponding census tracts are Rossville (CT 11), German Village (CT 146), Dayton Lane/North Dayton Lane (CT 6), Wilson Symmes/2nd Ward (CT 3), and Jefferson/North Jefferson (CT 4).

Discussion

The City reviewed 2010 Census and statistical information for ten (10) neighborhoods that have been determined to have at least 70% of its population with low and moderate incomes (80% of the City's

Median Family Income). The determined neighborhoods are: Bonnacker/Lincoln, Dayton Lane/North Dayton Lane, East Hamilton, German Village, Gordon-Cereal/Star Hill, Jefferson/N.Jefferson, North End, North Lindenwald, Rossville and Second Ward/Wilson Symmes. Information from the U.S. Census Bureau was analyzed and assigned a point value. The following information was used for the analysis: Population, Number in Household, Percentage of Households with Incomes Below \$10,000, Median Household Income, Per Capita Income, Percentage of Population Living below the Poverty Level, Number of Housing Units Vacant, Percentage of Rental Housing Units, and Percentage of Housing Units built prior to 1939. From these ten (10) neighborhoods the five (5) targeted areas were selected.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Hamilton has and plans to continue to invest resources in developing affordable housing not only in the Neighborhood Initiative Area (NIA) but also supports down payment and closing cost assistance through Neighborhood Housing Services (NHS) of Hamilton, Inc.'s, funding for acquisition of vacant properties to be utilized for new development. The City also commits funds to the rehabilitation of occupied units by extremely low - low income individuals/families.

The City also invests resources in the development of rental housing in conjunction with NHS. The City works with NHS to prioritize neighborhoods, identify sites, and guide the architectural design of rental housing developments.

One Year Goals for the Number of Households to be Supported	
Homeless	100
Non-Homeless	0
Special-Needs	2
Total	102

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	2
The Production of New Units	1
Rehab of Existing Units	55
Acquisition of Existing Units	10
Total	68

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

The City of Hamilton plans to commit funds to the following housing providers as an effort to increase the availability of affordable housing in the jurisdiction:

- Neighborhood Housing Services (NHS) - Down-payment/Closing Costs Assistance;
- Neighborhood Housing Services (NHS) - New Construction for Homeownership
- SELF - Rehabilitation and Resale Program;
- SELF - Neighbors Who Care Repair Program;

- The City of Hamilton's Minor Home Repair Program;
- Partnerships for Housing - Multifamily Acquisition Program.

AP-60 Public Housing – 91.220(h)

Introduction

The City of Hamilton's public housing is administered and managed by Butler Metropolitan Housing Authority (BMHA). BMHA has the ability to operate throughout Butler County. Currently 50% of all public housing units administered by BMHA are within the City of Hamilton. BMHA maintains approximately 1142 Public Housing units and 545 Housing Choice Vouchers as of February 2016 (per BMHA Administration). BMHA's units range from studio to four-bedroom apartments. One of BMHA's most recent projects includes the Beacon Pointe redevelopment, phase 1 of the development added 60 dwelling units on a vacant site within a significant needs area.

BMHA conducted a market analysis in 2005 to determine the types of units needed for future demand. BMHA's units in the City of Hamilton range from twenty to over sixty years in age. The units are primarily large family three and four bedroom units. BMHA has concluded that based on current demand and demographics smaller units (e.g. one and two bedroom units) will be needed in the future. Additionally, senior housing units will have an increase in demand. As the number of elderly/senior population in the jurisdiction increases.

Actions planned during the next year to address the needs to public housing

BMHA plans to investigate the possibility of partnering with U.S. Department of Veteran's Affairs Administration as well as other agencies to provide veteran housing. BMHA plans to accomplish this by potentially utilizing several options including site based waiting list with specific preferences for veterans.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

BMHA utilizes the following strategies to encourage public housing residents to become more involved with management and participate in homeownership:

BMHA encourages the development of Resident Councils at each of their housing sites;

BMHA is actively working with Supports to Encourage Low Income Families;

BMHA is actively working with Neighborhood Housing Services (NHS) to provide information to possible PHA residents and HCV participants.

If the PHA is designated as troubled, describe the manner in which financial assistance will be

provided or other assistance

The local PHA has not been designated as troubled.

Discussion

During the period of BMHA's 5yr/Annual Action Plan, the PHA has completed Beacon Pointe (60 units of affordable housing), and the demolition/disposition of Midtown Village.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City of Hamilton is an active participant in the Butler County Housing and Homeless Coalition (BCHHC). The BCHHC and Homeless Coalition apply and receive funding through the Balance of State Continuum of Care process. In addition, the City of Hamilton along with Butler County and City of Middletown has pledged financial assistance to the Butler County Housing and Homeless Coalition.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City seeks input from homeless persons through the solicitation of feedback during public meetings (e.g. Serve City) and the distribution of Public Needs Assessment surveys at public locations.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Hamilton routinely commits funding to address the needs of homeless individuals/families residing in emergency shelters or transitional housing (e.g. funding to local nonprofit organizations to support infrastructure repairs to a local shelter, etc.). The City also commits CDBG funds for a Victim's Advocacy Program (VAP). The VAP provides counseling and assistance to local victims of domestic violence.

Several community-wide agencies assist with homeless prevention such as rent and utility assistance through Supports to Encourage Low Income Families (S.E.L.F.) and the local Community Action Partnership of Greater Dayton, Ohio area office. Emergency shelter assistance is also provided via a voluntary church hospitality network, CHOSEN in Hamilton and SHALOM in nearby Middletown. Additionally, the City supports Transitional Living, Inc.'s working relationship with Butler Metropolitan Housing Authority (BMHA) to address the needs of homeless individuals/families with special needs. The Homeless Coalition, utilizing Butler County as the grantee, has applied for the recertification of twenty-three (23) units of Shelter Plus Care rental assistance to serve chronically homeless single adults with a qualifying disabling condition(s), and also the renewal of twenty (20) units of Shelter Plus Care rental assistance for homeless individuals and families with a qualifying disabling condition(s).

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were

recently homeless from becoming homeless again

The City of Hamilton plans and will continue to commit funds and support to programs and community organizations to assist homeless person in making the transition to permanent housing and independent living. The City plans to continue support to the local YWCA Life Skills and Housing Program. The program is a supportive, residential program for women, and transitional youth who are homeless and have a mental health diagnosis. The City also commits funds to the City of Hamilton's Internal Services for the Victim's Advocacy Program. The program provides counseling services to children and non-offending family members who have experienced trauma as a result of abuse. The program also provides assistance to individuals seeking to file Domestic Violence Civil Protection Orders (CPO) in the Butler County Domestic Relations Court.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The City of Hamilton has and plans to continue to assist low-income individuals and families from becoming homeless. As a result, the jurisdiction has partnered with and will facilitate discussions with local publicly funded institutions, systems of care, and organizations receiving assistance from public or private agencies to address the housing, health, social services, employment, education, or youth needs of the stated individuals and families. Example of programming supported by the City utilizing CDBG funds includes the support provided to the local YWCA's Life Skills and Housing Program, Victim's Advocacy Program, and Serve City's Supportive Homeless Services.

Discussion

The City of Hamilton will continue to promote and provide services to assist low-income and/or homeless individuals and families.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Two factors that affect the affordability of housing in a community are local property taxes and utility costs. According to the Butler County Auditor, [Rates of Taxation in Butler County, Ohio Tax Year 2016](#), the total effective rate class one for the City of Hamilton and the Hamilton City School District were the second (2nd) lowest in the immediate area. For example, Hamilton's taxes have decreased and are 56.19 mills as compared to: 59.35 mills for Fairfield City; 64.64 mills for Liberty Township; 43.26 mills for Oxford; and 74.77 mills for Middletown.

Hamilton owns and operates its own water, sewage treatment, gas and electric utilities. The gas and electric rates are generally less than other areas in Butler County that are served by Duke Energy. Hamilton's water costs are nearly one-third less than the County rates. Neither local taxes nor municipal utility costs are deemed barriers to affordable housing in Hamilton.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City of Hamilton will facilitate discussions with the City of Hamilton's Planning Commission to determine whether changes may be made to zoning and code requirements for housing units of families with five or more members.

Discussion:

Feedback gathered during the Assessment of Fair Housing process suggests that zoning and code requirements make the process of creating large housing units difficult. As a result the City plans to assess the zoning and code requirements.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Hamilton has and will continue to commit to actions that encourage and promote improvements to public facilities, economic development, public services, acquisition/new construction, and housing/rehabilitation. One example may be seen through the City's commitment to provide fair housing and tenant-landlord counseling services to local residents. The City continuously strives to eliminate housing discrimination and create a diverse and inclusive community.

Actions planned to address obstacles to meeting underserved needs

The City continues to invest resources into community development efforts that leverage and increase positive activities in distressed neighborhoods. These investments include Affordable Housing Development activities, Lead Safe Work Practices, and the Neighborhood Overlay Conservation Zoning District.

Actions planned to foster and maintain affordable housing

The City of Hamilton has and plans to continue to invest resources in developing affordable housing throughout the jurisdiction. The City also supports down payment and closing cost assistance through Neighborhood Housing Services (NHS) of Hamilton, Inc., and also funding for acquisition of vacant properties to be used for development.

Actions planned to reduce lead-based paint hazards

In an effort to reduce hazards in the City of Hamilton, the City utilizes Lead Safe Work Practices. These efforts lead to the creation of a residential facade program. The program encourages work to improve the exterior of income eligible owner occupied housing structures and improve its standard condition.

Actions planned to reduce the number of poverty-level families

The City feels that poverty reduction is an ongoing process. However, the City attempts to quantify program and project outcomes to measure against assumed baseline figures. As an example, the City assumed that 853 housing units have lead based paint issues (using HUD's formula for calculation). The City recognizes that lead abatement is proposed to be done on four- (4) units. Therefore, we can assume 849 units will have lead paint issues after the next grant cycle. Depending on projects and programs, baseline measures have and will continue to be developed. Additionally, the City uses statistical information for calculating the reduction rate of poverty. The three- (3) most used sources to determine the extent of poverty reduction by the City is unemployment rate, census income information and local income tax information.

Additional services planned to reduce the number of poverty-level families may include but not be limited to services for children, the elderly, job connection shuttle services, community outreach services, supportive homeless services, fair housing services, and victim's advocacy support services.

Actions planned to develop institutional structure

The delivery system in the City of Hamilton was enhanced by the development of a communications process with public service providers. Representatives from social service agencies and housing providers are part of the system. The formation of this process resulted in the community working together to identify problems, priorities, strategies and action plans to assist Hamilton citizens. The City is working toward closing gaps through consultation with citizens, community service providers and local public institutions, private industry, and nonprofit organizations.

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

Public Institution:

The City of Hamilton's Neighborhood Development Division will administer both the CDBG and the HOME programs. Funds will be used for a variety of activities which include, but may not be limited to, owner home rehabilitation, rental rehabilitation, home buyer assistance, capital improvements, economic development, and technical assistance to nonprofits and public services operated by nonprofits. The City may assist other public or nonprofit groups in providing other types of affordable housing assistance.

The Butler Metropolitan Housing Authority (BMHA) will continue and is responsible for carrying out the Comprehensive Public Housing Grant and Section 8 Voucher programs. As well as operating low income housing units. BMHA operates countywide and City of Hamilton Council appoints one board member to BMHA's board while the remaining members are selected by the County Commissioners. With the exception of BMHA units in Middletown, Ohio, BMHA owns and operates the majority of housing units located in the City of Hamilton. The City of Hamilton encourages all residents to participate in community planning efforts and the management of their units.

Private Industry

Private sector involvement includes financial institutions providing assistance via mortgage loans to assist with private rehabilitation (owner and renter) and also the first-time homebuyer program operated by Neighborhood Housing Services of Hamilton (NHS). There may also be private sector involvement in low-income housing tax credit projects for housing rehabilitation or new construction to increase affordable rental and home ownership opportunities.

Discussion:

Program Specific Requirements

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

Introduction:

N/A

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.	85.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

N/A

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The affordability period is determined by the total investment of HOME funds in the unit, regardless of whether or not the funds are reflected in buyer financing. If the assisted property is sold while under the resale restrictions, the home must be sold to a HOME eligible buyer approved by the jurisdiction. The price at resale must provide the original HOME-assisted homebuyer a fair return on the investment and be affordable to a reasonable range of low-income buyers. Therefore, sales price during the affordability period could occur at fair market value with the following limitations:

Fair return on investment is defined as the purchase price, plus 25% of the increase, if any, in value at the time of resale based on the valuation performed by a qualified Ohio-licensed appraiser. The appraisal would be the objective standard used at the time of the original purchase and at time of resale. The value of capital improvements, if any, would be determined by the value appraised at the time of resale.

The sales price shall not exceed a price that results in net proceeds (after first lien and seller closing costs) to the seller that exceeds:

1. the reimbursement of the original owner's investment including down payment and closing costs made at the time of initial purchase, if any;
2. the value of capital improvements , if any, to the property as determined by an appraisal;
3. the principal amortized on the first lien during the period of ownership.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The participating jurisdiction (PJ) uses the "recapture" method under the HOME program as required by 92.254. Specifically:

- The PJ uses the pro rata reduction model of recapture amount during affordability periods for HOME programs unless developer subsidy is used;
- Recapture amount is the direct subsidy received by homeowners in the PJ's homebuyer assistance

program;

- The amount of recapture is limited to net proceeds from the sale or transfer of title whether voluntary or involuntary. Net proceeds are defined as sale price minus superior loan repayment (other than HOME funds) and closing costs.

The participating jurisdiction (PJ) uses the “resale” method under the HOME program as required by 92.254 specifically:

- The PJ uses the resale model for new construction for homeownership when there is only development subsidy such as when Habitat for Humanity develops new construction for homeownership.
4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

N/A

The City of Hamilton will verify that housing remains affordable to subsequent purchasers during the HOME period of affordability. Housing will be considered affordable if the subsequent purchaser's monthly payment of principal, interest, taxes and insurance do not exceed 30% of the gross income of a qualified low-income family with an income less than 80% of area median income for the area.

