Strategic Plan

SP-05 Overview

Strategic Plan Overview

Clermont County is expected to receive an average of approximately $932,702 in federal funding each year, over the next five years, through Community Development Block Grant (CDBG) program. These federal funds will be used to address the following priority needs in the community:

- Economic Development
- Street, Sidewalk, Water/Sewer/Septic Improvements
- Fair Housing
- Job Training Activities
- Housing Rehabilitation
- Transportation Services
- Rental Housing Rehabilitation
- Permanent Supportive Housing
- Senior and Youth Facilities and Services
- Supportive Services
- Accessibility Improvements
- Emergency Shelters and Transitional Housing
- Down Payment Assistance
- Local and Regional Planning
- Property Acquisition/Resale
- Parks, Recreation, and Community Facilities
- Food Security
- Demolition Clearance and Remediation
- Code Enforcement
- Lead Paint Remediation
- Urgent Need

DRAFT - 4/15/15

Addressing these needs will assist Clermont County in achieving the over-arching housing and community development goals, as follows:

1. Enhance Economic Development Activities and Provide Customized Training Opportunities to Residents
2. Improve Public Facilities and Infrastructure
3. Increase Quality and Affordability of Owner Occupied Homes

4. Address the Needs of the Homeless and At-Risk Families
5. Increase Quality and Affordability of Rental Housing
6. Provide and Expand Public Services

Clermont County will administer and oversee the distribution of these federal program funds. The County will work with local units of government, housing agencies and public service providers to remove barriers to affordable housing, assist the homeless population, reduce the number of families experiencing poverty, and other efforts identified in this strategic plan.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 46 - Geographic Priority Areas

1	Area Name:	Low/Mod Area
	Area Type:	Eligible Census Tract/Block Group
	Other Target Area Description:	Eligible Census Tract/Block Group

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

While the County is not officially establishing Geographic Priority Areas in the 2015 to 2019 planning cycle. The County has identified the following potential Geographic Priority Areas to be evaluated during future Consolidated Planning processes.

Potential geographic priority areas in Clermont County:

- Low-Mod Census Tracts.
- Low income areas located in the southern portion of the County.
- Areas of the County where there is a lack of affordable housing, including Amelia, Batavia, Bethel, Felicity, New Richmond, Newtonsville, Goshen Township, Miami Township, and Union Township.

DRAFT - 4/15/15

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 47 – Priority Needs Summary

1	Priority Need Name	Economic Development
	Priority Level	Low
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Enhance Economic Development &Training Activities
	Description	Enhance economic development activities and provide job training opportunities.

DRAFT - 4/15/15

	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
2	Priority Need Name	Streets, Sidewalk, Water/Sewer/Septic Improvements
	Priority Level	Low
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Non-housing Community Development
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Improve Public Facilities and Infrastructure Enhance Economic Development &Training Activities
	Description	Address infrastructure needs for low-income residents and in low-income neighborhoods.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
3	Priority Need Name	Fair Housing
	Priority Level	Low

DRAFT - 4/15/15

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Increase Quality of Owner Occupied Homes Address the Needs of Homeless and At-Risk Families Increase Quality and Affordability of Rental Housing
	Description	Promote access to housing for all residents that qualify.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
4	Priority Need Name	Job Training Activities
	Priority Level	Low

DRAFT - 4/15/15

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Provide and Expand Public Services Enhance Economic Development &Training Activities
	Description	Provide Job Training Assistance to Low-income and special needs residents.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders
5	Priority Need Name	Owner Housing Rehabilitation
	Priority Level	Low

DRAFT - 4/15/15

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Individuals Families with Children Elderly
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Increase Quality of Owner Occupied Homes
	Description	Assist low-mod homeowners to complete necessary repairs.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
6	Priority Need Name	Transportation Services
	Priority Level	Low

DRAFT - 4/16/15

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Improve Public Facilities and Infrastructure Address the Needs of Homeless and At-Risk Families Provide and Expand Public Services Enhance Economic Development &Training Activities
	Description	Improve transportation for low-income residents.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
7	Priority Need Name	Rental Housing Rehabilitation
	Priority Level	Low

DRAFT - 4/15/15

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Address the Needs of Homeless and At-Risk Families Increase Quality and Affordability of Rental Housing
	Description	Provide adequate rental housing for low-income persons and families.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
8	Priority Need Name	Permanent Supportive Housing
	Priority Level	Low

DRAFT - 4/15/15

	Population	Extremely Low Low Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Address the Needs of Homeless and At-Risk Families Increase Quality and Affordability of Rental Housing Provide and Expand Public Services
	Description	Support Homeless prevention and rapid re-housing.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
9	Priority Need Name	Senior and Youth Facilities and Services
	Priority Level	Low
	Population	Extremely Low Low Moderate Middle Families with Children Elderly Public Housing Residents Rural Individuals Families with Children Elderly Frail Elderly
	Geographic Areas Affected	
	Associated Goals	Provide and Expand Public Services
	Description	Continue and improve programs and facilities that serve seniors and youth.

DRAFT - 4/15/15

	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
10	Priority Need Name	Supportive Services
	Priority Level	Low
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Provide and Expand Public Services Enhance Economic Development &Training Activities
	Description	Provide services and access to public resources for low-income residents.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
11	Priority Need Name	Accessibility Improvements
	Priority Level	Low

DRAFT - 4/15/15

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Improve Public Facilities and Infrastructure Increase Quality of Owner Occupied Homes Increase Quality and Affordability of Rental Housing Provide and Expand Public Services
	Description	Improve accessibility for low-income residents.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
12	Priority Need Name	Emergency Shelters and Transitional Housing
	Priority Level	Low

DRAFT - 4/15/15

	Population	Extremely Low Low Large Families Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Address the Needs of Homeless and At-Risk Families Increase Quality and Affordability of Rental Housing Provide and Expand Public Services
	Description	Provide housing and shelter opportunity to populations in need.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
13	Priority Need Name	Down Payment Assistance
	Priority Level	Low

DRAFT - 4/15/15

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Rural Individuals Families with Children Elderly Victims of Domestic Violence
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Increase Quality of Owner Occupied Homes Provide and Expand Public Services Enhance Economic Development &Training Activities
	Description	Provide down payment assistance to income eligible homebuyers.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
14	Priority Need Name	Local and Regional Planning
	Priority Level	Low

DRAFT - 4/15/15

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Improve Public Facilities and Infrastructure Increase Quality of Owner Occupied Homes Address the Needs of Homeless and At-Risk Families Increase Quality and Affordability of Rental Housing Provide and Expand Public Services Enhance Economic Development &Training Activities
	Description	Improve planning for regional coordination of housing and community development activities.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
15	Priority Need Name	Property Acquisition/Resale

DRAFT - 4/15/15

	Priority Level	Low
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Individuals Families with Children Persons with HIV/AIDS Victims of Domestic Violence Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Increase Quality of Owner Occupied Homes Address the Needs of Homeless and At-Risk Families Increase Quality and Affordability of Rental Housing
	Description	Acquire, rehabilitate, and resell properties to support low-income residents.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
16	Priority Need Name	Parks, Recreation, and Community Facilities
	Priority Level	Low

DRAFT - 4/15/15

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Improve Public Facilities and Infrastructure Increase Quality of Owner Occupied Homes Address the Needs of Homeless and At-Risk Families Increase Quality and Affordability of Rental Housing Provide and Expand Public Services Enhance Economic Development &Training Activities
	Description	Develop public facilities to improve quality of life for low-income residents and in low-income neighborhoods.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
17	Priority Need Name	Food Security

DRAFT - 4/15/15

	Priority Level	Low
	Population	Extremely Low Low Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Address the Needs of Homeless and At-Risk Families Provide and Expand Public Services
	Description	Provide food access services and programs to support low-income residents.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
18	Priority Need Name	Demolition, Clearance and Remediation
	Priority Level	Low

DRAFT - 4/15/15

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Families with Children Mentally Ill Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Non-housing Community Development
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Improve Public Facilities and Infrastructure Increase Quality of Owner Occupied Homes Increase Quality and Affordability of Rental Housing Enhance Economic Development &Training Activities
	Description	Demolish blighted properties.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
19	Priority Need Name	Code Enforcement
	Priority Level	Low

DRAFT - 4/15/15

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Increase Quality of Owner Occupied Homes Increase Quality and Affordability of Rental Housing Enhance Economic Development &Training Activities
	Description	Improve and continue code enforcement activities in low-income neighborhoods.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
20	Priority Need Name	Lead Paint Remediation
	Priority Level	Low

DRAFT - 4/15/15

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Rural Individuals Families with Children Elderly Frail Elderly
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Increase Quality of Owner Occupied Homes Increase Quality and Affordability of Rental Housing
	Description	Reduce exposure of low-income residents to lead paint hazards.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.
21	Priority Need Name	Urgent Need
	Priority Level	Low

DRAFT - 4/15/15

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Low-Mod Income areas and census tracts
	Associated Goals	Improve Public Facilities and Infrastructure Increase Quality of Owner Occupied Homes Address the Needs of Homeless and At-Risk Families Increase Quality and Affordability of Rental Housing Provide and Expand Public Services Enhance Economic Development &Training Activities
	Description	Provide resources to communities that lack the resources to address eligible urgent needs.
	Basis for Relative Priority	Priorities were determined through public engagement activities, which included focus groups, open houses and interviews with key stakeholders.

DRAFT - 4/15/15

Narrative (Optional)

The priority needs were determined through public outreach and coordination with local agencies and service providers. The County anticipates addressing these needs through program funding during the 2015 to 2019 planning cycle.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Tenant Based Rental Assistance is a potential avenue for funding and a priority based on the high amount of ELI and LMI persons in the County that experience cost burden (29.02%) and severe cost burden (7.01%).
TBRA for Non-Homeless Special Needs	Tenant Based Rental Assistance is an option to address non-homeless special needs
New Unit Production	New Unit production is a low priority due to availability of existing housing supply. New unit development will be prioritized only in Low Income areas, areas without affordable housing options (rural), and areas that can take advantage of infrastructure and transportation projects.
Rehabilitation	According to CHAS data, approximately 30% of households in Clermont County have one of the conditions defined as a Housing Problem making rehabilitation a high priority.
Acquisition, including preservation	Acquisition and preservation will remain a priority to encourage home ownership and eliminate blighted areas through redevelopment and code enforcement.

Table 48 – Influence of Market Conditions

DRAFT - 4/15/15

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

Clermont County primarily use CDBG funds to accomplish specific objectives in the next five years.

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	932,702	0	0	932,702	3,730,808	

Table 49 - Anticipated Resources

DRAFT - 4/15/15

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

Community Development Block Grant funds will leverage additional resources as follows:

- Public Infrastructure & public facility projects will be supported with other funds from participating jurisdictions.
- Rehabilitation funds will leverage other sources to expand the scope of rehabilitation assistance.

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

Publically owned land may be used but there are no specific projects or strategies to note.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Clermont County Board of Developmental Disabilities	Government	Non-homeless special needs	Region
Clermont Metropolitan Housing Authority	PHA	Public Housing	Region
CLERMONT COUNTY	Government	Economic Development	Region
Clermont Senior Services Inc.	Non-profit organizations	Non-homeless special needs public facilities public services	Region
PEOPLE WORKING COOPERATIVELY	Non-profit organizations	Public Housing	Region
Clermont County Department of Job and Family Services	Government	Homelessness Non-homeless special needs public services	Region
Greater Cincinnati Habitat for Humanity	Non-profit organizations	Ownership Public Housing Rental	Region
Clermont County Department of Community and Economic Development	Government	Economic Development	Region
LEGAL AID SOCIETY OF GREATER CINCINNATI	Non-profit organizations	public services	Region
Clermont County Public Health	Government	neighborhood improvements public services	Region
Park National Bank	Regional organization	Economic Development neighborhood improvements	Region

DRAFT - 4/15/15

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Clermont County Mental Health and Recovery Board	Government	Homelessness public services	Region
YWCA of Greater Cincinnati	Non-profit organizations	Homelessness Non-homeless special needs Public Housing public services	Region
Clermont Continuum of Care/Affordable Housing Commission	Non-profit organizations	Homelessness	Region
Clermont County Township Association	Government	Economic Development	Region
Batavia Township	Government	Economic Development neighborhood improvements public facilities	Region
Franklin Township	Government	Economic Development neighborhood improvements public facilities public services	Region
Goshen Township	Government	Economic Development neighborhood improvements public facilities public services	Region
Jackson Township	Government	Economic Development neighborhood improvements public facilities public services	Region

DRAFT - 4/15/15

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Miami Township	Government	Economic Development neighborhood improvements public facilities public services	Region
Ohio Township	Government	Economic Development neighborhood improvements public facilities public services	Region
Monroe Township	Government	Economic Development neighborhood improvements public facilities public services	Region
Pierce Township	Government	Economic Development neighborhood improvements public facilities public services	Region
Stonelick Township	Government	Economic Development neighborhood improvements public facilities public services	Region
Tate Township	Government	Economic Development neighborhood improvements public facilities public services	Region

DRAFT - 4/15/15

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Union Township	Government	Economic Development neighborhood improvements public facilities public services	Region
Washington Township	Government	Economic Development neighborhood improvements public facilities public services	Region
Wayne Township	Government	Economic Development neighborhood improvements public facilities public services	Region
Williamsburg Township	Government	Economic Development neighborhood improvements public facilities public services	Region
Bethel Village	Government	Economic Development neighborhood improvements public facilities public services	Region
Felicity Village	Government	Economic Development neighborhood improvements public facilities public services	Region

DRAFT - 4/15/15

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Moscow Village	Government	Economic Development neighborhood improvements public facilities public services	Region
City of Milford	Government	Economic Development neighborhood improvements public facilities public services	Region
New Richmond Village	Government	Economic Development neighborhood improvements public facilities public services	Region
Newtonsville Village	Government	Economic Development neighborhood improvements public facilities public services	Region
Owensville Village	Government	Economic Development neighborhood improvements public facilities public services	Region
Williamsburg Village	Government	Economic Development neighborhood improvements public facilities public services	Region
Clermont County Community Services Inc.	Non-profit organizations	Homelessness public facilities public services	Region

DRAFT - 4/15/15

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Clermont County Veterans Services Commission	Government	Homelessness Rental public facilities public services	Region

Table 50 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Although individual communities and organizations determine the projects they would like to submit for funding, effective program controls are in place. Clermont County tracks expenditures and general progress, and ensures overall compliance. Each partner, however, is responsible for successful and compliant implementation of its CDBG projects. This occurs in a variety of ways, as follow:

- The County monitors fund use to ensure timeliness, and monitor compliance with requirements including continuing affordability, affirmative marketing, procurement, and Labor standards, and shares the results with members.
- Each partner implements projects using its staff and using local procedures. The County uses documentation, e.g. labor certifications, invoices and the like, to monitor individual projects for compliance. Each community corrects emergent problems, and the County provides technical assistance, as necessary.
- The County monitors (and provides technical assistance for) activities as prescribed by regulation but also based on assessed risk. It will monitor more frequently, if needed.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X		X

Street Outreach Services			

DRAFT - 4/15/15

Law Enforcement	X	X	
Mobile Clinics	X		X
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X		X
Education	X		X
Employment and Employment Training	X		X
Healthcare	X		X
HIV/AIDS	X		X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
Other			

Table 51 - Homeless Prevention Services Summary

DRAFT - 4/15/15

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

A well-rounded service delivery system has been established to meet the needs of persons experiencing homelessness. The community benefits from having major community providers as active members of the local Continuum of Care (CoC). The need for permanent affordable supportive housing and services continues to be a pressing issue for persons experiencing homelessness and other special needs populations.

Clermont County does not receive HOPWA funds to assist persons living with HIC/AIDS with supportive housing options. Support services for persons living with HIV/AIDS is coordinated through the Ohio Balance of State programs.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Clermont County has excellent administrative capacity, with capable staff, excellent relationships with communities and non-governmental entities, and innovative programs. In addition to positive relationships with communities, the County maintain open lines of communication with the Clermont

Community Services (local contact for CoC) and many other non-profits servicing Clermont County low-income residents. The gaps in the institutional delivery of systems can be described in three categories:

1. Management and Capacity: The programs and funds are distributed through complex system of cities, service providers, and organizations. The County is challenged in that each recipient has its own limitations and capacity constraints.
2. Program Administration: Reporting requirements increasingly make it difficult for grant recipients to administer projects and programs, this extends to all levels of the process and is confounded by staffing and budget limitations.
3. Service Streamlining: The dispersion and overlap of programming can create inefficiencies in service provision.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The Clermont County consolidated planning process has identified the following strategies to overcome gaps in the institutional structure and service delivery

Strategies to Improve Management Capacity:

- Develop Efficiencies: additional cost-effective ways to provide affordable housing: Clermont County will continue to seek additional ways to share resources and costs to maintain an acceptable level of program and management capacity.
- Identify Service Gaps: Improve efficiency and effectiveness of service delivery. Enhance program design and delivery.
- New Programs: Develop and implement new programs and initiatives, if necessary and in keeping with the priority objectives of this Plan.

Strategies to Improve Program Administration:

- Training and Coordination: Staff reductions and turnover can limit effective working environments. Working through 27 municipal and several non-profit sub-recipients requires training programs so all participants can work effectively.
- Communication and Clarification of Program Requirements: Complex and sometimes conflicting program requirements can significantly increase administrative complexity and burden. The County will work with program participants to clarify and collaborate of reporting.

Strategies to Achieve Streamlining of Services:

- Capacity Development for Community Non-Profit Organizations: The County provides support to several non-profit organizations. All are experienced and have the requisite capacity to succeed

DRAFT - 4/15/15

in their roles. However, the County seeks additional opportunities to expand projects, programs, and services through added capacity to local organizations.

- Expanding the Network of Partners – The County will continue efforts to strengthen existing and establish new relationships with service providers to expand and strengthen services in the community.
- Sub-recipient Monitoring – The County will continue to monitor and to assist sub-recipients in the 2015 to 2019planning period. Monitoring will be performed through risk assessment and Technical Assistance will be provided based on the degree of need.

DRAFT - 4/15/15

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Enhance Economic Development &Training Activities	2015	2020	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development		Economic Development Streets, Sidewalk, Water/Sewer/Septic Improvements Job Training Activities Transportation Services Supportive Services Down Payment Assistance Local and Regional Planning Parks, Recreation, and Community Facilities Demolition, Clearance and Remediation Code Enforcement Urgent Need		

DRAFT - 4/15/15

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Improve Public Facilities and Infrastructure	2015	2020	Affordable Housing Public Housing Non-Homeless Special Needs Non-Housing Community Development		Streets, Sidewalk, Water/Sewer/Septic Improvements Transportation Services Accessibility Improvements Local and Regional Planning Parks, Recreation, and Community Facilities Demolition, Clearance and Remediation Urgent Need		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15000 Persons Assisted Homelessness Prevention: 150 Persons Assisted

DRAFT - 4/15/15

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Increase Quality of Owner Occupied Homes	2015	2020	Affordable Housing Homeless Non-Homeless Special Needs		Fair Housing Owner Housing Rehabilitation Accessibility Improvements Down Payment Assistance Local and Regional Planning Property Acquisition/Resale Parks, Recreation, and Community Facilities Demolition, Clearance and Remediation Code Enforcement Lead Paint Remediation Urgent Need		Homeowner Housing Rehabilitated: 160 Household Housing Unit

DRAFT - 4/15/15

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Address the Needs of Homeless and At-Risk Families	2015	2020	Affordable Housing Public Housing Homeless		Fair Housing Transportation Services Rental Housing Rehabilitation Permanent Supportive Housing Emergency Shelters and Transitional Housing Local and Regional Planning Property Acquisition/Resale Parks, Recreation, and Community Facilities Food Security Urgent Need		

DRAFT - 4/15/15

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Increase Quality and Affordability of Rental Units	2015	2020	Affordable Housing Public Housing Homeless Non-Homeless Special Needs		Fair Housing Rental Housing Rehabilitation Permanent Supportive Housing Accessibility Improvements Emergency Shelters and Transitional Housing Local and Regional Planning Property Acquisition/Resale Parks, Recreation, and Community Facilities Demolition, Clearance and Remediation Code Enforcement Lead Paint Remediation Urgent Need		Public service activities for Low/Moderate Income Housing Benefit: 250 Households Assisted

DRAFT - 4/15/15

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Provide and Expand Public Services	2015	2020	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Job Training Activities Transportation Services Permanent Supportive Housing Senior and Youth Facilities and Services Supportive Services Accessibility Improvements Emergency Shelters and Transitional Housing Down Payment Assistance Local and Regional Planning Parks, Recreation, and Community Facilities Food Security Urgent Need		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 125 Persons Assisted

Table 52 – Goals Summary

DRAFT - 4/15/15

Goal Descriptions

1	Goal Name	Enhance Economic Development &Training Activities
	Goal Description	Economic development, job creation, and business attraction and retention continue to be a priority for Clermont County residents. Public Engagement conducted for this plan noted the need work to eliminate blight in low-income areas and the retail/commercial clusters that serve them. Training opportunities for low-income residents was identified as a priority activity as well.
2	Goal Name	Improve Public Facilities and Infrastructure
	Goal Description	Community and stakeholder feedback indicate a need for public works and improvements throughout the County. The public demands that facilities and infrastructure be maintained and installed as appropriate to meet existing and increased needs. This Plan will focus on maintaining and improving existing (and creating new) public facilities and improvements that primarily serve LMI people, or which are located in eligible LMI neighborhoods.
3	Goal Name	Increase Quality of Owner Occupied Homes
	Goal Description	The maintenance and preservation of housing for all residents but particularly affordable housing for LMI owners is a high priority of this Plan. Owner occupied housing can be a lift for low income residents and families that need a hand-up to experience improved opportunities and a higher quality of life.
4	Goal Name	Address the Needs of Homeless and At-Risk Families
	Goal Description	Homelessness is not a pervasive issue in Clermont County; however, ending homelessness and preventing at risk families and individuals from becoming homeless is a fundamental priority this plan. Clermont County has several shelters, but homeless people also make use of camps, vehicles, hotels, and the streets for temporary shelters. Strategies to address known homeless populations as well as people sporadically homeless, temporarily housed, illegally squatting in foreclosed properties, or who have special needs will be prioritized.
5	Goal Name	Increase Quality and Affordability of Rental Housing
	Goal Description	The maintenance and preservation of affordable rental housing for LMI residents is also a high priority of this Plan. Rental housing is often either preferred or the only attainable housing for many low-income residents. Further, individuals and families that are at-risk of becoming homeless require assistance to maintain their dignity and preserve their place in the economic mainstream. Families that face economic uncertainty due to low-incomes incomes resulting or employment issues can be lifted up through supportive housing assistance.
6	Goal Name	Provide and Expand Public Services

DRAFT - 4/15/15

	Goal Description	Community and stakeholder feedback also indicate a strong need for improved human services, particularly as they relate to individuals and families that suffer from drug abuse problems or domestic violence issues. Additional services and programming to benefit young people and the elderly is also desirable in Clermont County. Public Engagement indicated that there was a lack of programming in these areas and expanding services would address local needs.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Based on the 5-year plan, Clermont County estimates that it will provide assistance to approximately 500 families using CDBG fund allocations. Clermont County does not at this time manage HOME or ESG funds.

DRAFT - 4/15/15

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

No additional accessible units are required under Section 504 of the Rehabilitation Act of 1973.

Activities to Increase Resident Involvements

The County seeks to encourage consultation and collaboration with the Clermont Metropolitan Housing Authority. The County encourages CMHA to initiate the following strategic activities during the 2015 to 2019 planning cycle to increase resident involvement and improve reporting.

- Form resident advisory councils
- Hold bimonthly or quarterly open meetings with residents to discuss their issues and priorities
- Provide training and education to residents on healthy family living practices, like healthy meal preparation, cleanliness, home upkeep, family exercise, and community stewardship

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

The Clermont Metropolitan Housing Authority is not designated as troubled.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The creation and preservation of affordable housing options in Clermont County is affected by market conditions and public policies. Outreach to agencies identified the following barriers to affordable housing in the County.

- **Information:** Lack of information about service availability, affordable housing availability, and no single point of contact for residents.
- **Transportation:** Lack of transportation options and un-walkable roadways discourage neighborhood investment and project feasibility.
- **Infrastructure:** Gaps in the network and poor roadway conditions lead to poor connectivity and separation between residences, good and services, and jobs. Additionally, septic service and water issues prevent or hinder provision of low-income housing in certain areas.

DRAFT - 4/15/15

- **Income Surveys:** Several census tracts in Clermont County with low-income areas were disqualified from meeting median income requirements in 2010, in part due to increases in income experience countywide. Now income surveys will be required to document eligibility, an administrative barrier to project funding.
- **Affordable Housing Supply:** There is a lack of options for affordable housing in Clermont County, particularly one bedroom apartment and multi-family housing types, especially in rural areas. Housing that does exist has long wait lists.
- **Perception:** Public perception that affordable housing is "bad" for neighborhoods. A holistic, community-wide approach is needed to confront stigma.
- **Barriers to Entry:** Credit reports, background checks, and lack of down payment or security deposit assistance programs prevent people that need housing from being approved.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The following strategies can help assist in the removal or amelioration of the previously identified barriers to affordable housing.

- **Information:** Establish a single point of contact for of information about service availability, affordable housing availability.
- **Transportation:** Invest in transportation services that address the needs of low-income residents in Clermont County.
- **Infrastructure:** Invest in infrastructure projects that address the needs of low-income residents in Clermont County, including sidewalks, roadway conditions, and sewer/septic improvements.
- **Income Surveys:** Encourage eligible areas to conduct income surveys to document eligibility for programmatic and project assistance.
- **Affordable Housing Supply:** Invest in the provision of affordable one-bedroom apartments and multi-family housing types, especially in rural areas.
- **Perception:** Address public stigma regarding affordable housing through project outreach and information services.
- **Barriers to Entry:** Invest in programs that provide assistance in removing barriers that low-income residents experience in their efforts to find affordable housing, including providing down payment assistance and security deposit assistance programs

SP-60 Homelessness Strategy – 91.215(d)

Describe how the jurisdiction's strategic plan goals contribute to:

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

The County will address the needs of low-income persons at risk of homelessness, by supporting programs in Clermont County that supply emergency housing services and provide essential human

DRAFT - 4/15/15

services to homeless persons. It will support programs to provide prevention and rapid re-housing assistance to affected households. These measures are expected to continue throughout the life of this Plan.

As mentioned prior, Clermont County is a part of the Ohio Balance of Care and embraces the strategies described in the Ohio Consolidated Plan prepared by the Ohio Development Services Agency. Clermont County is part of the Region 14 approach, which is mandated by the State, to operate the HCRP grant, Homeless Crisis Response Program. The region consists of 3 counties, Clermont Warren and Butler. The lead county is Warren and they manage and distribute the funding to the counties. These funds help to assist clients with homeless prevention, facing eviction and can fund clients to help them stay in their homes, the other part of the program is rapid re-housing. Clermont Community Services uses these funds to help clients coming out of the shelter and entering into a permanent housing situation. Clermont Community Services has a program to pay first month's rent and security deposit. Clermont Community Services also offers trainings at the James Sauls Homeless shelter to teach financial workshops, nutrition, parenting, etc. Clermont Community Services offers case management to help homeless people overcome barriers associated with homelessness. Clermont Community Services offers extensive referral services to homeless people and the organization works closely with other Clermont agencies, especially OhioMeansJobs and Clermont County Department of Jobs and Family Services. The James Sauls Homeless Shelter is the only homeless shelter in Clermont County besides the Domestic Violence Shelter operated by the YWCA.

Overall, the state of Ohio's approach to homelessness in Ohio includes programs and services addressing each stage of the homeless continuum: homeless prevention, emergency shelter, transitional housing, rapid re-housing, permanent supportive housing and aftercare programs. The state of Ohio has restructured these homeless programs to emphasize priority on preventing individuals and families from experiencing homelessness and, where homelessness does occur, rapidly moving individuals and families into permanent, sustainable housing.

Addressing the emergency and transitional housing needs of homeless persons

Clermont County affirms the following programs and strategies to address the emergency and transitional housing needs of homeless persons that are outlined in the State of Ohio Consolidated Plan:

Rapid Re-Housing

The state of Ohio will provide for tenant-based (or "transition in place") rapid re-housing through the Homeless Crisis Response Program (HCRP) shelter diversion activities. Persons served in this category must be homeless according to HUD's definition and at or below 30 percent of Area Median Income (AMI). Rapid Re-housing programs provide short- or medium-term rental assistance and services for households that are currently homeless, with the goal of being able to maintain housing after the subsidy ends. This assistance can include rental assistance (including back rent for months where the household has been unable to pay), utility deposits, security deposits, and/or moving costs. Housing

DRAFT - 4/15/15

models that require tenants to move out of their unit at the end of assistance are not eligible under this category.

Emergency Shelter

The state of Ohio will continue to provide Emergency Shelter assistance to homeless families and individuals through the Homeless Crisis Response Program (HCRP). HCRP funds provide emergency shelter and supportive services to homeless persons in Ohio. OCD provides grants to eligible nonprofit organizations and units of local government to maintain, operate and staff emergency shelters for the homeless and to provide essential services to the homeless.

Transitional Housing

The state of Ohio will provide Transitional Housing through the Supportive Housing Grant Program. This will include housing and supportive services designed to help program participants attain permanent housing in a 4- to 24-month period. Housing can be provided in units operated by the agency or in independent rental units in the community. For the purpose of this program, supportive housing activities are limited to facility-based or sponsor-based program models, either single-site or scattered-site. Tenant-based supportive housing activities are provided through the rapid re-housing activities in the Homeless Crisis Response Program. Clermont County currently has no transitional housing available.

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

Clermont County affirms the following programs and strategies to assist homeless persons in making the transition to permanent housing and independent living that are outlined in the State of Ohio Consolidated Plan:

Permanent Supportive Housing

The permanent supportive housing component of the Supportive Housing Grant Program provides housing and supportive services to maximize disabled homeless individuals' and families' ability to live more independently within the permanent housing environment. Along with housing, these projects provide supportive services including case management, employment assistance and life skills.

Aftercare

Aftercare services are designed to ensure that formerly homeless individuals and families are able to maintain permanent housing. These services include intensive case management and supportive

DRAFT - 4/15/15

services tailored to the individual's or family's goal of self-sufficiency and permanent housing. In Ohio, aftercare services to formerly homeless families will be provided through the Homeless Crisis Response Program within the categories mentioned above.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Clermont County affirms the following programs and strategies to prevent individuals and families from becoming homeless that are outlined in the State of Ohio Consolidated Plan:

Homelessness Prevention

The state of Ohio will continue to provide financial assistance and services to prevent individuals and families from becoming homeless through the Homeless Crisis Response Program (HCRP) shelter diversion activities. Funds for these activities must be targeted to individuals and families who would be homeless without this assistance, and meet the following minimum criteria:

1. have at least an initial consultation with a case manager or other authorized representative who can determine the appropriate type of assistance to meet their needs;
2. be at or below 30 percent of Area Median Income (AMI); and
3. be at risk of losing its housing, have no appropriate subsequent housing options and lack the financial resources and support networks needed to remain in existing housing.

Eligible assistance includes: short- or medium-term rental assistance and housing relocation and stabilization services, including such activities as mediation, credit counseling, security or utility deposits, utility payments, moving cost assistance, and case management.

DRAFT - 4/15/15

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

LBP testing is conducted on each assisted property built prior to 1978. Lead risk assessments are completed for all housing units receiving assistance through a housing rehabilitation program. When conditions are found which indicate a potential lead-based paint hazard, appropriate remedial action will be included as part of the homeowner rehabilitation work. All lead work will be conducted in accordance with federal regulations and performed by a certified and/or licensed contractor.

How are the actions listed above related to the extent of lead poisoning and hazards?

County grant recipients always perform abatement rather than interim control measures. These actions significantly reduce the reoccurrence of lead based paint hazards.

How are the actions listed above integrated into housing policies and procedures?

In accordance with federal regulations, staff distribute the EPA/HUD "Protect Your Family from Lead in Your Home" pamphlet and provides other appropriate information to all housing rehabilitation assistance recipients. The information covers the dangers of lead-based paint, symptoms of lead paint poisoning, and provides instructions on actions to be taken if symptoms of lead-based paint poisoning are present. Rehabilitation Specialists in the County attend HUD sponsored "Lead Safe Work Practices Training for Trainers Course" and refresher courses on lead safe work practices, and are qualified to teach a one day course to approved contractors and subcontractors addressing lead-based paint hazards during renovation, remodeling, and rehabilitation in federally owned and assisted housing.

Staff will continue working closely with HUD and other regional agencies to obtain necessary training, information, and funding for these required efforts. Staff will plan to conduct training sessions with all active contractors and contractors interested in becoming approved to bid on housing projects. During trainings, contractors will be made aware of the EPA Lead-Based Paint Renovation, Repair and Painting requirements. All contractors will be encouraged to become EPA certified renovators to meet the requirements and remain eligible to bid on housing projects where lead has been identified.

DRAFT - 4/15/15

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The county and its member communities have well-established service networks to provide services to impoverished people. These include:

- The Clermont County Affordable Housing Coalition has several members that provide services to families in poverty.
- A County Health program to provide assistance to families and children.
- Clermont County Department of Jobs and Family Services provides public assistance for food, Medicaid, Medicare, and emergency assistance.
- Clermont County Community Services has several programs to address critical service needs. These include home weatherization and other energy assistance activities, youth services, pediatric medical, senior services, plus coordinating with the CoC activities for the homeless.
- Employment training and job counseling is available through OhioMeansWork or other initiatives like the Work Initiative Network (WIN) of Life Point Solutions

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The activities to be undertaken by the County, and its member communities, will improve the quality of life and opportunities for many residents living in poverty. Providing affordable housing, supporting economic development, improving public infrastructure and many other goals, actions, and strategies discussed in this plan contribute to the County's anti-poverty strategy.

The County, consistent with goals and objectives of this plan, will promote human services for low-income persons. These services promote positive life-styles which increase chances for long-term emotional, familial, and employment stability.

Additionally, the County will work to support and coordinate with agencies that provide business development counseling to small business investors and owners, including low income individuals. These services reduce poverty by promoting self-sufficiency and long-term employment. Finally, the County will continue to support the efforts of the OhioMeansWork program to provide job training and employment services.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

With a focus on ensuring compliance, the County will include program requirements in all contractual agreements (including outreach to women and minority owned businesses), sponsor orientation sessions and provides technical assistance. Staff defines clear expectations regarding performance standards, policies and procedures.

Staff will conduct annual on-site programmatic and fiscal monitoring reviews of CDBG human service agencies at least once every two years (more frequently if the sub-recipient is new or is having difficulty meeting program or contract requirements.) Staff will ensure systems are in place to verify income eligibility and Urban County residency and reviews the agency's financial management systems, audits, federal 990, policies and procedures, their files and records of federally funded projects completed in the past year. Staff will prepare a final monitoring report that summarizes the information gathered during the site visit, including findings and concerns, and forwards a copy of the report to the agency. Regular review of monthly or quarterly reports, program evaluation forms, program visits and phone calls are also part of program monitoring procedures.

Staff will ensure compliance with all program regulations of the CDBG. Components of project monitoring include compliance with eligible activities and National Objectives, HUD program rules and administrative requirements, as well as progress against production goals, needs for technical assistance, and evidence of innovative or outstanding performance. Financial monitoring ensures that sub-recipients comply with all of the Federal regulations governing their financial operations. This includes reviewing original supporting documentation for financial transactions, time sheets, tracking

DRAFT - 4/15/15

expenditures into the general ledgers, checkbooks and bank transactions, internal controls, reviewing financial transactions to ensure that they are within the approved budget, and that expenditures are eligible and reasonable. Rehabilitation Specialists conduct on-site inspections, lead-based paint assessments, monitor the progress of construction and rehabilitation completed by contractors and subcontractors, and ensure code compliance.

DRAFT - 4/15/15

Expected Resources

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

Introduction

The County will primarily use CDBG funds to accomplish specific objectives in the next five years.

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	932,702	0	0	932,702	3,730,808	

Table 53 - Expected Resources – Priority Table

DRAFT - 4/15/15

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

Community Development Block Grant funds will leverage additional resources as follows:

- Public Infrastructure & public facility projects will be supported with other funds from participating jurisdictions
- Rehabilitation funds will leverage other sources to expand the scope of rehabilitation assistance

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

Publically owned land may be used but there are no specific projects or strategies to note.

DRAFT - 4/15/15

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	Enhance Economic Development &Training Activities	2015	2020	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development		Economic Development Streets, Sidewalk, Water/Sewer/Septic Improvements Job Training Activities Transportation Services Rental Housing Rehabilitation Permanent Supportive Housing Owner Housing Rehabilitation Down Payment Assistance Parks, Recreation, and Community Facilities Code Enforcement Lead Paint Remediation Urgent Need	CDBG: $93,270	

DRAFT - 4/15/15

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Improve Public Facilities and Infrastructure	2015	2020	Affordable Housing Public Housing Non-Homeless Special Needs Non-Housing Community Development		Economic Development Streets, Sidewalk, Water/Sewer/Septic Improvements Transportation Services Senior and Youth Facilities and Services Accessibility Improvements Parks, Recreation, and Community Facilities Urgent Need	CDBG: $475,162	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted Homelessness Prevention: 30 Persons Assisted
3	Increase Quality of Owner Occupied Homes	2015	2020	Affordable Housing Homeless Non-Homeless Special Needs		Fair Housing Permanent Supportive Housing Owner Housing Rehabilitation Down Payment Assistance Property Acquisition/Resale Urgent Need	CDBG: $315,432	Homeowner Housing Rehabilitated: 32 Household Housing Unit

DRAFT - 4/15/15

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Address the Needs of Homeless and At-Risk Families	2015	2020	Affordable Housing Public Housing Homeless		Fair Housing Job Training Activities Rental Housing Rehabilitation Permanent Supportive Housing Owner Housing Rehabilitation Senior and Youth Facilities and Services Supportive Services Accessibility Improvements Emergency Shelters and Transitional Housing Down Payment Assistance Local and Regional Planning Property Acquisition/Resale Food Security Demolition, Clearance and Remediation Code Enforcement Lead Paint Remediation Urgent Need		

DRAFT - 4/15/15

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Increase Quality and Affordability of Rental Units	2015	2020	Affordable Housing Public Housing Homeless Non-Homeless Special Needs		Economic Development Streets, Sidewalk, Water/Sewer/Septic Improvements Fair Housing Rental Housing Rehabilitation Permanent Supportive Housing Accessibility Improvements Emergency Shelters and Transitional Housing Property Acquisition/Resale Code Enforcement Urgent Need	CDBG: $93,270	Public service activities for Low/Moderate Income Housing Benefit: 50 Households Assisted

DRAFT - 4/15/15

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Provide and Expand Public Services	2015	2020	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Economic Development Fair Housing Job Training Activities Transportation Services Senior and Youth Facilities and Services Supportive Services Emergency Shelters and Transitional Housing Local and Regional Planning Parks, Recreation, and Community Facilities Food Security Code Enforcement Lead Paint Remediation Urgent Need	CDBG: $71,000	Public service activities other than Low/Moderate Income Housing Benefit: 25 Persons Assisted

Table 54 – Goals Summary

DRAFT - 4/15/15

Goal Descriptions

1	Goal Name	Enhance Economic Development &Training Activities
	Goal Description	No specific projects are planned for 2015; however, the general administration and planning activities undertaken by the County Contribute to this goal. Additionally, septic rehabilitation and public infrastructure and facilities projects implement the economic development strategies of this plan.
2	Goal Name	Improve Public Facilities and Infrastructure
	Goal Description	2015 Public Facilities and Infrastructure projects include $475,162 in CDBG funds is being allocated to fund parks, sidewalks, and facilities that service low-income residents in Clermont County.
3	Goal Name	Increase Quality of Owner Occupied Homes
	Goal Description	2015 projects include funding the Clermont County Health District Septic Rehab Program and funding for People Working Cooperatively Home Repairs.
4	Goal Name	Address the Needs of Homeless and At-Risk Families
	Goal Description	No specific projects are planned for 2015; however, Fair Housing services, and drug rehabilitation services are expected to benefit individuals and families at risk of being homeless. Additionally, funding of repairs to the YWCA shelter benefit this population.
5	Goal Name	Increase Quality and Affordability of Rental Units
	Goal Description	2015 projects supported include the Clermont County provision of Fair Housing Services.
6	Goal Name	Provide and Expand Public Services
	Goal Description	The 2015 projects supported include drug and alcohol counseling of low income qualified residents of Clermont County through their participation in the Clermont County Community Alternative Sentencing Center (CASC).

DRAFT - 4/15/15

Projects

AP-35 Projects – 91.220(d)

Introduction

The following projects are identified to meet the needs of the 2015-2019 Clermont County Consolidated plan.

Projects

#	Project Name
1	Clermont County Health District Septic Rehab Program
2	Public Facilities and Infrastructure Improvements
3	Public Services
4	People Working Cooperatively Home Repairs
5	Administration and Planning

Table 55 – Project Information

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

Starting in 2015, the County will initiate management of an annual funding cycle for CDBG funds to communities and applicants based on how well the proposed projects meet the priority needs and goals of this Comprehensive Plan. The communities are charged with identifying activities and assistance areas, based on citizen input informed by law and regulation, to address local needs and priorities that were consistent with the goals of the Consolidated Plan.

DRAFT - 4/15/15

AP-38 Project Summary

Project Summary Information

1	Project Name	Clermont County Health District Septic Rehab Program
	Target Area	
	Goals Supported	Increase Quality of Owner Occupied Homes
	Needs Addressed	Owner Housing Rehabilitation Code Enforcement
	Funding	:
	Description	This project will provide assistance with septic system repairs or replacement to LMI qualified homeowners in Clermont County; and/or sewer connections if available in the area. CDBG funds in the amount of $150,000 will be allocated to assist approximately 7 households, with an average benefit of 25 LMI persons.
	Target Date	12/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated at least 7 LMI qualified households could be assisted with septic system repair, replacement or possible sewer connect (where applicable). The average number of beneficiaries is approximately 25 persons.
	Location Description	Countywide, applicants are selected via an application process to determine income eligibility requirements.
	Planned Activities	To repair or replace malfunctioning sewer systems or connect to public sewer system where available.
2	Project Name	Public Facilities and Infrastructure Improvements
	Target Area	
	Goals Supported	Improve Public Facilities and Infrastructure
	Needs Addressed	Streets, Sidewalk, Water/Sewer/Septic Improvements Accessibility Improvements Emergency Shelters and Transitional Housing Parks, Recreation, and Community Facilities
	Funding	:

DRAFT - 4/15/15

	Description	Under the Public Facilities and Infrastructure Improvements approximately $453,000 in CDBG funds is being allocated to fund the following activities including the Jackson Township Marathon Park Improvements in the amount of $90,000; the Village of Owensville Gauche Park Improvements in the amount of $143,000; the City of Milford Memorial Park Improvements in the amount of $70,000; the replacement of backup generators for Fire Station No. 48 and Fire Station No. 50 located in Union Township in the amount of $75,000; the placement of a sidewalk and crosswalk along Amelia Olive Branch Road in Batavia Township in the amount of $75,000; and the repair/resurfacing of the parking lot to the YWCA House of Peace Domestic Violence Shelter in the amount of $22,162. All projects will benefit LMI income residents or limited clientele of Clermont County. Specific beneficiary numbers will be available under each activity.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that approximately 1000 LMI residents will benefit from the park improvement projects located in the Village of Owensville, the City of Milford and the Jackson Township areas; it is estimated at least 500 LMI residents will benefit from the sidewalk and cross walk project in Batavia Township; and it is anticipated at least 1500 LMI residents will benefit from the replacement of emergency backup generators at the two firehouse stations in Union Township; it is anticipated the repairs to the domestic violence shelter parking area and landscaping will assist at least 30 limited clientele residents of Clermont County.
	Location Description	Under the Public Facilities and Infrastructure Improvements approximately $453,000 in CDBG funds is being allocated to fund the following activities including the Jackson Township Marathon Park Improvements in the amount of $90,000; the Village of Owensville Gauche Park Improvements in the amount of $143,000; the City of Milford Memorial Park Improvements in the amount of $70,000; the replacement of backup generators for Fire Station No. 48 and Fire Station No. 50 located in Union Township in the amount of $75,000; the placement of a sidewalk and crosswalk along Amelia Olive Branch Road in Batavia Township in the amount of $75,000; and the repair/resurfacing of the parking lot to the YWCA House of Peace Domestic Violence Shelter in the amount of $22,162. All projects will benefit LMI income residents or limited clientele of Clermont County. Specific beneficiary numbers will be available under each activity.

DRAFT - 4/15/15

	Planned Activities	Activities include the installation of a public restroom facility at the Marathon Park in Jackson Township; the purchase of two natural gas powered generators for backup support during weather events or power outages for the Fire Station No. 48 and Fire Station No. 50 located in Union Township; Drainage improvements, walking trail resurfacing, purchase of lighting, playground equipment for the Village of Owensville Gauche Park ; the City of Milford Memorial Park Improvements include replacement of benches, improvement to walkways and ADA accessibility; replacement of veteran monuments ; the placement of a sidewalk and crosswalk along Amelia Olive Branch Road in Batavia Township; and the repair/resurfacing of the parking lot and installation of privacy fencing to the YWCA House of Peace Domestic Violence Shelter.
3	Project Name	Public Services
	Target Area	
	Goals Supported	Provide and Expand Public Services
	Needs Addressed	Supportive Services
	Funding	:
	Description	This public service project will specifically assist with drug and alcohol counseling of LMI qualified residents of Clermont County through their participation in the Clermont County Community Alternative Sentencing Center (CASC). The program will provide necessary treatment, therapy and life and vocational skills. Goals are to reduce recidivism by providing drug and alcohol treatment, cognitive therapy, and other related services. The program will be housed in available space located at the Clermont County Adult Detention Center; Clients will be provided temporary living arrangements at the facility while participating in the program, which is anticipated to be 30-90 days in length. The proposed CDBG allocation of $71,000 is committed to this program with approximately 25 LMI beneficiaries being served.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	The drug and alcohol counseling and life skills services will be made available to LMI eligible clients of the Clermont County Community Alternative Sentencing Center (CASC), who are recommended for participation in CASC through the Clermont County Court System. It is estimated to help at least 25 clients (maybe more) depending on the number of hours a client participates in counseling sessions.

DRAFT - 4/15/15

	Location Description	The program will be housed in available space located at the Clermont County Adult Detention Center; Clients will be provided temporary living arrangements at the facility while participating in the program, which is anticipated to be 30-90 days in length. The address of the facility is Clermont County Adult Detention Center is 4700 Filager Road, Batavia, Ohio 45103.
	Planned Activities	This public service project will specifically assist with drug and alcohol counseling of LMI qualified residents of Clermont County through their participation in the Clermont County Community Alternative Sentencing Center (CASC). The program will provide necessary treatment, therapy and life and vocational skills. Goals are to reduce recidivism by providing drug and alcohol treatment, cognitive therapy, and other related services. The program will be housed in available space located at the Clermont County Adult Detention Center; Clients will be provided temporary living arrangements at the facility while participating in the program, which is anticipated to be 30-90 days in length. The proposed CDBG allocation of $71,000 is committed to this program with approximately 25 LMI beneficiaries being served.
4	Project Name	People Working Cooperatively Home Repairs
	Target Area	
	Goals Supported	Increase Quality of Owner Occupied Homes
	Needs Addressed	Owner Housing Rehabilitation
	Funding	:
	Description	As a sub-recipient, the People Working Cooperatively agency will provide home repair services to eligible LMI homeowners in Clermont County.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	It is anticipated at least 25 LMI families will be assisted with home repair services in Clermont County.
	Location Description	Location of home repair services is a countywide effort and is based on need and income eligibility to meet program participation requirements.
	Planned Activities	The People Working Cooperatively agency will provide home repair services to eligible LMI homeowners in Clermont County through an application process.
5	Project Name	Administration and Planning
	Target Area	

DRAFT - 4/15/15

	Goals Supported	Enhance Economic Development &Training Activities Provide and Expand Public Services
	Needs Addressed	Fair Housing
	Funding	:
	Description	Includes activities for the general administration of the CDBG grant and other related administrative activities including the provision for Fair Housing Services for the county.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	Includes activities for the general administration of the CDBG grant and other related administrative activities including the provision for Fair Housing Services for the county. It is estimated at least 50 LMI families will be assisted with Fair Housing Services.
	Location Description	Countywide
	Planned Activities	Includes activities for the general administration of the CDBG grant and other related administrative activities including the provision for Fair Housing Services for the county

DRAFT - 4/15/15

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

Clermont allocates as much CDBG funding as possible to its 27 member communities, less program administration, housing rehabilitation, and public services.

Starting in 2015, the County will initiate management of an annual funding cycle for CDBG funds to communities and applicants based on how well the proposed projects meet the priority needs and goals of this Comprehensive Plan. The communities are charged with identifying activities and assistance areas, based on citizen input informed by law and regulation, to address local needs and priorities that were consistent with the goals of the Consolidated Plan.

Geographic Distribution

Target Area	Percentage of Funds
LMI Census Tracts	

Table 56 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Clermont County operates an Urban County CDBG program that encompasses a large geographic area including diverse participating communities. In the 2010 census, many of the census tracts previously defined as LMI were eliminated due to rising incomes in the County; however, many of these tracts still contain eligible LMI areas. To confront this barrier, individual communities will conduct income surveys to document eligibility of projects.

The County's philosophy is that the local communities know local needs best. As a result, communities are encouraged to submit project applications that fit their local needs. Project applications are evaluated by the County as to how well they address the goals and priority needs included in this Consolidated Plan. CDBG funds, less administration, housing rehabilitation, and public services, are distributed via this process.

DRAFT - 4/15/15

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	30
Non-Homeless	
Special-Needs	25
Total	55

Table 57 - One-Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	55
The Production of New Units	
Rehab of Existing Units	82
Acquisition of Existing Units	
Total	132

Table 58 - One-Year Goals for Affordable Housing by Support Type

DRAFT - 4/15/15

AP-60 Public Housing – 91.220(h)

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

The County received no applications for public housing activities in the 2015 program year.

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

As described in the Strategic Plan, the County supports PHAs developing programs to encourage residents to participate in management, community programming, and resident councils.

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

The CMHA is not designated as troubled.

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

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 County's local shelters, operated by Clermont Community Services and the YWCSA are staffed with people who are in a unique position to assess the needs of homeless people. Outreach efforts are managed through the CoC to reduce duplications efforts to ensure that the greatest number of persons are assisted. The agencies included in the coordination include emergency shelters, warming centers(s), transitional housing programs, permanent housing programs, the youth shelter and street outreach and those providing short-term rental and financial assistance to very low income and homeless individuals and families.

As mentioned prior, Clermont County is a part of the Ohio Balance of Care and embraces the strategies described in the Ohio Consolidated Plan prepared by the Ohio Development Services Agency.

The state of Ohio's approach to homelessness in Ohio includes programs and services addressing each stage of the homeless continuum: homeless prevention, emergency shelter, transitional housing, rapid re-housing, and permanent supportive housing and aftercare programs. The state of Ohio has restructured these homeless programs to emphasize priority on preventing individuals and families from experiencing homelessness and, where homelessness does occur, rapidly moving individuals and families into permanent, sustainable housing

Addressing the emergency shelter and transitional housing needs of homeless persons

The County 2015 - 2019 Consolidated Plan addresses homeless and homelessness prevention in four separate priorities: #3 Fair Housing, #8 Permanent Supportive Housing, # 10 Supportive Services, and #12 Emergency Shelter and Transitional Housing. This Plan implements these priorities by proving funding to the Continuum of Care for coordination of prevention and housing activities, as well as funding prevention, emergency shelter, transitional housing and permanent housing. Projects that address these priority needs have been ranked accordingly. It should also be noted that homelessness is also addressed through the various housing, public housing and community development programs mentioned throughout this Annual Plan.

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

DRAFT - 4/15/15

As mentioned, the County is a part of the State of Ohio Balance of Care CoC. Through the organizations that support CoC services in Clermont County, including Clermont Community Services, the County will continue to support programs that provide services to temporarily and chronically homeless families and individuals. This will occur through:

- Continuing strategic and tactical planning
- Continued applications for assistance made available by HUD, the State of Ohio, and other appropriate agencies,
- Seeking ways to expand the reach and effectiveness of the CoC in Clermont County through financial and other means of support.
- Considering the feasibility of applications made by agencies to provide affordable transitional and permanent housing to homeless and at-risk populations,
- Providing human services to address the root causes of homelessness.

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 County will implement the goals and strategies contained in Ohio Consolidated Plan prepared by the Ohio Development Services Agency.

Clermont County, through its CDBG programs, will continue to collaborate with service agencies to provide emergency shelter, transitional housing and permanent housing, as well as assistance to homeless individuals and those at risk of becoming homeless. It will also financially support public services designed to address the root causes of homelessness and provide interim assistance to help those affected address their daily needs.

DRAFT - 4/15/15

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

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

Clermont County has a variety of housing types in all price ranges. It does not control municipal decision-making, but advises communities about land use policies and controls, zoning ordinances, and other actions that can promote affordable housing. It also identifies trends and helps communities plan for them, e.g. the Clermont County Comprehensive Plan, with results shared with municipalities so that they can factor design considerations into their ordinances. Other planned actions include:

- Implement its housing activities in a fair and equitable manner as required by law.
- Work on elderly housing issues and assist local municipalities that have expressed improving senior housing.
- Continue collaborative efforts with housing providers to promote both affordable home ownership and rental housing opportunities for LMI households.
- The County will continue to strengthen existing relationships, and build new relationships in its efforts to increase affordable housing opportunities.
- Support, if possible, other reasonable proposals for affordable housing.
- Work to address other barriers outlined in the strategic plan as opportunities arise.

AP-85 Other Actions – 91.220(k)

Introduction:

The County will engage in a variety of activities through public and private partnerships to further address community needs.

Actions planned to address obstacles to meeting underserved needs

The County will continue to collaborate and partner with a wide network of housing and human service providers, to identify areas of need in the community.

Actions planned to foster and maintain affordable housing

The County will foster affordable housing including, with rehabilitation programs and encourage enhancements of code enforcement in low-income neighborhoods.

Actions planned to reduce lead-based paint hazards

The County will make sure complete lead risk assessments on done on all housing rehabilitation projects.

Actions planned to reduce the number of poverty-level families

The County will continue to offer services to families in poverty and support outside human service programs administered by community service providers.

Actions planned to develop institutional structure

The County will make a continued effort to improve services and service delivery, to customers, employees and partners in the community.

DRAFT - 4/15/15

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

The County will continue to partner with the Clermont Community Services, the YWCA and other service agencies to promote coordination of services.

Program Specific Requirements

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

Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(l)(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.

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	
Total Program Income	0

Other CDBG Requirements

1. The amount of urgent need activities	100%

DRAFT - 4/15/15

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DRAFT - 4/15/15

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