



Consolidated Plan
Fiscal Year 2022-2026
Annual Action Plan
Fiscal Year 2022-2023

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

Submit to the U.S. Department of Housing & Urban Development
Summer, 2022

The purpose of this Substantial Amendment is to amend FY22-23 funds as well as other available prior year funds for the purpose of Public Facility projects and administration costs.

Executive Summary

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

1. Introduction

The City of Hamilton has completed the Consolidated Plan for FY 2022-2026 and Annual Action Plan for FY 2022-2023 in accordance with the consolidated process developed by HUD. The Consolidated Plan and Annual Action Plan both identify the activities proposed for funding with Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) resources. Within the said plans the city's process, needs assessment, market analysis, Strategic Plan (FY 2022-26), and Annual Action Plan (FY 2022-23) are all identified.

The City will continue to concentrate its efforts in four (4) principal areas: Housing, Economic Development, Public Services, and Public Facility Improvements.

Housing: The development/maintenance of the City's affordable housing stock is imperative to community development and quality of life. The City will continue to provide resources for home repair, housing rehabilitation and other housing stabilization and production programs. The City will also partner with local agencies and organizations to develop affordable housing including units targeting very low, low to moderate income residents. Lastly, the City anticipates clearing vacant, unsafe and blighted nuisance properties that adversely impact the health, safety and welfare of residents.

Economic Development: Expanding economic development opportunities to encourage investments, retain/create jobs, revitalize business districts, and increase employment-training opportunities are a priority. The City anticipates providing access to the Revolving Loan Fund (RLF) to key business and start-up investments.

Public Service: The City focuses its efforts in Public Service in order to address the unique needs of the LMI resident population. The City will continue to concentrate on fair housing, homeless services, affordable public transportation, senior/youth recreation, and crime victim advocacy.

Public Facility Improvements: Improvements to public facilities and infrastructure located in the City that serves LMI residents is critical to community development and quality of life efforts. The City will make public improvements that support and provide aid to the community, enhance, and complement neighborhood and community activities.

These overall objectives will continue to be assessed to ensure consistency with citizen input, survey results, and feedback. As indicated in the Citizen Participation section of the Consolidated Plan. The City not only conducts the required public input meetings and makes draft documents available for review and comment but also solicits input from service providers and conducts an annual needs survey of residents.

Note: In preparing the Consolidated Plan the City of Hamilton may use two available waivers provided by HUD. More specifically, Waiver: Public Hearings - Provisions found at 24 CFR 91.105(e)(1) and (2), 24 CFR 91.115(b)(3)(i), 24 CFR 91.401, and 24 CFR 570.431, 570.441, and 570.486(a)(5) to the extent necessary to prevent the spread of the Coronavirus. Waiver: Pre-award Costs - Allowing grantees to treat the effective date of the grant agreement as the program start date or the date that the consolidated plan/action plan (with actual allocation amounts) is received by HUD whichever is earlier. Pre-award costs may be permitted contingent upon the city's approval. The city has asked that HUD waives 24 CFR 92.212(b) to the extent necessary to permit eligible pre-award costs to be incurred as of the beginning of the program year or the date the consolidated plan describing the HOME allocation to which the costs will be charged is received by HUD.

Note: In addition to CDBG and HOME funds the City will amend FY 21-22 to include HOME-ARP funds. The use of funds will be highlighted in the amended plan as instructed by HUD.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

In addition to the concentration of efforts in Housing, Economic Development, Public Services, and Public Facility Improvements, the Consolidated Plan objectives and outcomes must also meet one of the three National Objectives as dictated by HUD. The three National Objectives include:

- Benefiting low and moderate income persons;
- Addressing slum or blight; or
- Meeting a particular urgent community development need.

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

- Healthy, safe, viable, affordable housing stock;
- Continuum of Care that easily transitions the homeless population to permanent housing;
- Stable, growing permanent employment opportunities for all city residents;

- Public Services that provide needed support and services to community members; and
- Public Facility and Infrastructure that addresses and meets the needs of city residents.

3. Evaluation of past performance

The City has maintained the necessary and required CDBG timeliness ratios; HOME rules are reserved, committed, and expended funds have been met. The City continues to monitor subrecipients as needed and upon request/concern. Site visit or virtually monitor is also conducted. New subrecipients receive frequent monitoring/assistance during the program year. Subrecipients that have not performed for any reason are evaluated in writing. If non-performing subrecipients cannot or will not meet its agreement obligations, their agreement may be terminated. As a result, the City does not allow the "terminated" subrecipient program to apply for future funding until it demonstrates its ability to accomplish obligations. Very rarely has the city had subrecipients who have not complied or are unable to perform as required.

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

In addition to the above, at the end of each program year the City of Hamilton prepares the Consolidated Annual Performance Evaluation Report (CAPER) which identifies the funds and activities from the previous program year, highlights their accomplishments, and identifies their connection to the Consolidated Plan.

4. Summary of citizen participation process and consultation process

The City of Hamilton has created an effective Citizen Participation Plan to ensure optimum input from the public. The City uses a four (4) point approach to engage active citizen participation.

Needs Assessment Survey: The City of Hamilton produces an annual Needs Assessment Survey. This assessment is done to ensure the City's plans and activities accurately reflect community needs by residents of Hamilton. This Needs Assessment also provides a tool to address the priority of the community needs. The City created and distributed a survey that was mailed to approximately 500 randomly selected Hamilton households coded by census tract, and emailed over 600 persons who live, work, or attend entertainment venues in the city. The survey "return rate" was approximately 4.2 percent. The results of the mail survey are attached.

The City of Hamilton also posted the annual Needs Assessment Survey on the city's website for a defined period. The survey results were tabulated independently of the mail survey to ascertain differences between the survey responses. Approximately 27 completed web surveys were received.

Public Meetings: The City also hosted seven (3) virtual public input meetings as part of the preparation of the Consolidated Plan and Annual Action Plan. Two (2) meetings were held on August 24, 2021 and one (1) August 25, 2021.

30 Day Public Comment Period: After the draft Annual Action Plan was prepared, there is a 30-Day Public Comment Period. A Legal Notice was published and the City website was updated to inform residents and interested parties where the draft Annual Action Plan was available for public review upon request for viewing. The Legal Notice indicating where the draft Annual Action Plan would be available for viewing from February 26, 2022 thru March 26, 2022 in the Hamilton Journal News. Any public comments received during this period were to be responded to in writing (email or hard copy) within fifteen (15) working days. The draft Annual Action Plan Update was also available for viewing or download from the City of Hamilton website.

Public Hearings: The city holds two public hearings in order to receive public comment on the Consolidated Plan for 2022-2026 and the Annual Action Plan for Fiscal Year 2022-2023 prior to submission to HUD. The first public hearing was held on March 3, 2022 at 1:30 pm in City Council Chambers during the Planning Commission meeting, and the second was held on March 9, 2022 at 6:00 pm during the City Council Meeting in City Council Chambers. During the first public hearing a presentation was made which included the proposed draft budget allocation (Final allocation amounts will be updated upon receipt from HUD. Adjustments will be made to reflect the final allocation amounts.). During the City Council Public Hearing verbal comments were received concerning the availability of funds for the homeless. More specifically, comments concerning the availability of funds for the local homeless shelter, Serve City.

The Annual Action Plan Update, including Community Development Block Grant Project Use of Funds, the HOME Program Description and City's Displacement Policy are to be submitted to HUD Spring 2022.

5. Summary of public comments

The following Public Services were revealed as a Significant Need:

Drug/Substance Abuse Services; Youth Services/Programs; Health Services; Employment/Job Training; Mental Health Services; Services for Developmentally Disabled; & Services for Battered and Abused Spouses/Children.

The Following Public Facilities were revealed as a Significant Need:

Street Repaving/Repair; Water/Sewer Improvements; Youth Center; Homeless Facilities; & Health Facilities.

Demo

During the city's public hearing during the City Council meeting. Comments were received concerning the use of funds in support of the city's local shelter, Serve City. The city manager and Finance Director answered the proposed questions and also spoke with the citizen that presented the comments after the meeting.

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

The city welcomes and takes into consideration all comments received. At times the city receives written comments on returned surveys that are not suitable for inclusion in the planning process (e.g. derogatory language).

7. Summary

The city looks forward to partnering with the United States Department of Housing and Urban Development (HUD), surrounding governments, jurisdictions, service providers, community organizations, and residents to achieve the goals and objectives established by this document during the upcoming (five) years.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

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

Agency Role	Name	Department/Agency
CDBG Administrator	HAMILTON	Finance Dept./Neighborhood Development Division
HOME Administrator	HAMILTON	Finance Dept./Neighborhood Development Division

Table 1 – Responsible Agencies

Narrative

The City of Hamilton is an entitlement community under the CDBG and HOME programs under the Housing and Community Development Act of 1974, as amended. CDBG and HOME Program funds are allocated nationwide to units of general local government on the basis of a formula that considers the relative inadequacy of each jurisdiction's housing supply, its level of poverty, its fiscal distress, and other factors.

The City of Hamilton Finance Department acts as the lead agency for the development and administration of the Consolidated Plan and the Annual Action Plan as well as the administration of Hamilton's CDBG and HOME funds.

The City of Hamilton will complete 48 years of Community Development Block Grant (CDBG) Program and 30 years of HOME Investment Partnership Program at the end of Fiscal Year 2022-2023.

Consolidated Plan Public Contact Information

City of Hamilton Neighborhood Development Division

A Division of the Finance Department

City of Hamilton

345 High Street

Consolidated
Plan

HAMILTON

7

Demo

Hamilton, OH 45011

Tel: (513) 785-7020

Email: Matt.Mckinney@hamilton-oh.gov

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

The development of the Consolidated Plan included public surveys, public meetings, a thirty-day public comment period and two public hearings. Throughout this process public and private agencies were invited to participate to provide a broad range of opinions and firsthand knowledge could be used in the city's decision-making process.

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

The City of Hamilton emailed needs assessment surveys to current and past service providers in order to receive a broader base of knowledge concerning the needs of Hamilton's special populations. Additionally, the City partnered with Housing Opportunities Made Equal (H.O.M.E.) to complete a qualitative report for the 2021 Assessment of Fair Housing (AFH). The analysis included interviewing residents and stakeholders through six (6) focus groups and an electronic survey. The focus groups included landlords, property managers, residents and social service providers. Additionally, a web-based survey concerning Fair Housing was implemented to gain the perspective of the public and also to acquire the feedback of individuals working in and for the City of Hamilton or Butler County government.

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

The City of Hamilton is an active participant in the Butler County Homeless and Housing Coalition (BCHHC) the Continuum of Care organization for the area. BCHHC receives funding from the Balance of State Continuum of Care process through the Ohio Department of Development. In addition, the City provides financial assistance to some City-based member agencies (e.g Serve City & YWCA), and provided each agency with access to the Needs Assessment Survey and an invitation to the city's Fair Housing and Annual Action Plan public meetings.

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

The City of Hamilton does not receive ESG funds.

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

Table 2 – Agencies, groups, organizations who participated



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

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Butler County Housing & Homeless Coalition	The Boys and Girls Club was sent a needs assessment survey in order to better understand the needs of the population they are serving within the City of Hamilton.
BMHA	Butler Metropolitan Housing Authority	The city and BMHA have a signed and agreed upon Consistency with the Consolidated Plan. (available upon request)

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

The City of Hamilton refers individuals and organizations that are located within or reside outside of our jurisdiction to the correct agencies that may be able to provide assistance and/or funds to address their needs.

Narrative (optional):

Please see "Introduction" above.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

The City of Hamilton has created an effective Citizen Participation Plan to ensure optimum input from the public. The City uses a four (4) point approach to engage active citizen participation.

Needs Assessment Survey: The City of Hamilton produces an annual Needs Assessment Survey. This assessment is initiated to ensure the City's plans and activities accurately reflect community needs by residents of Hamilton. The Needs Assessment also aids as a tool to address the priority of the community needs. The City created and distributed a survey that was mailed to approximately five hundred (500) randomly selected Hamilton households coded by census tract. The survey "return rate" was approximately 4.7%. The results of the mail survey are attached.

The City of Hamilton also posted the annual Needs Assessment Survey on the city's website for a defined period. The survey results were tabulated independently of the mail survey to ascertain differences between the survey responses. During the defined period, approximately two months, there were 17 completed web surveys.

Public Meetings: Three (3) virtual public meetings were led by the city. One of which included a CDBG and HOME technical assistance seminar for past and future funding recipients.

- Survey results were tabulated and presented during the Public Hearings to facilitate dialogue concerning the community's needs. Survey results on topics of Housing, Public Facilities/Infrastructure, Economic Development, Clearance/Demolition and Public Service needs were presented.
- Information regarding the use and general guidelines of CDBG and HOME funds for community development purposes was discussed.
- Finally, a review of accomplishments with previous year's funding was presented during these meetings.

Three (3) virtual public meetings were led by the city. One of which included a CDBG and HOME technical assistance seminar for past and future funding recipients.

Demo

30 Day Public Comment Period: After the draft Annual Action Plan was prepared, there is a 30-Day Public Comment Period. A Legal Notice was published and the City website was updated to inform residents and interested parties of how they may attain a copy. The Legal Notice was published on February 26, 2022 in the Hamilton Journal News. The draft period was from February 26, 2022 through March 26, 2022. Any public comments received during this period were to be responded to in writing within fifteen (15) working days. The draft Annual Action Plan Update was also available for viewing or download from the City of Hamilton website. **No comments were received during the 30-day public comment period.**

Public Hearings: The city holds two public hearings in order to receive public comment on the Consolidated Plan for 2022-2026 and the Annual Action Plan for Fiscal Year 2022-2023 prior to submission to HUD.

Public Hearing 1: The first Public Hearing was held on March 03, 2022 at the City of Hamilton Planning Commission Meeting. No comments were received.

Public Hearing 2: The second Public Hearing was held on March 09, 2022 at the City of Hamilton City Council Meeting. Comments were received during the city council public hearing concerning the use of funds for the homeless. More specifically, an audience member requested additional information concerning the city's use of funds to aid the local homeless shelter, Serve City.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
------------	------------------	--------------------	--------------------------------	------------------------------	--	---------------------

Demo

1	Public Meeting	Non-targeted/broad community	The city held the first Virtual Public Meeting on Tuesday, August 24, 2021 at 11am. The city had one attendee representing the local homeless shelter.	The attendee provided feedback concerning the need for additional support for the homeless. Possible ideas for support were discussed. The city has considered and will continue to consider the comments received when determining the amount of CDBG funds committed for the homeless.	The city accepts and encourages feedback.	
---	----------------	------------------------------	--	--	---	--

Demo

2	Public Meeting	Non-targeted/broad community	The city held its second Virtual Public Meeting on Tuesday, August 24, 2021 at 6pm.	During this meeting the city received comments concerning funds to assist with housing that is not covid related, funding the local YWCA and homeless shelter, and encouraging landlords to consider renting to people who have been evicted due to the pandemic.	The city accepts and encourages feedback.
3	Public Meeting	Non-targeted/broad community	The city held its third Virtual Public Meeting and Technical Assistance Training on Wednesday, August 25, 2021 at 1pm.	During this meeting the city received much needed feedback including, but not limited to, significant needs in the jurisdiction being homelessness, food insecurity, low-income housing availability, domestic violence services, elimination of	The city accepts and encourages feedback.

Demo

				racism. While moderate needs identified included: quality staffing for supportive/social services, triage support/resources, resources committed to small business development (minorities), career development, and transportation (access for persons		
				in need of supportive services).		

Demo

4	Public Hearing	Non-targeted/broad community	The city held the 1st Public Hearing to review and approve the Analysis of Impediments to Fair Housing on Thursday, November 4, 2021 at 1pm during the city's Planning Commission meeting.	During the Public Hearing an Alternate Board Member expressed concern as to whether enough surveys were submitted to provide an accurate analysis of the identified needs in the community. It was explained to the Alternate Board Member that although the survey results are an important facet of the AI analysis; the results are not the only nor primary source of data used to identify the city's AI impediments. Nonetheless, the city will continue to work to encourage citizen participation and acquire feedback.	The city accepts and encourages feedback.	
---	----------------	------------------------------	--	---	---	--

Demo

5	Public Hearing	Non-targeted/broad community	On March 3, 2022 the city had its 1st Public Hearing concerning the FY 2022-2026 Consolidated Plan and FY 2022-2023 Annual Action Plan during the City's Planning Commission meeting.	During this meeting no comments were received.	The city accepts and encourages feedback.	
6	Public Meeting	Non-targeted/broad community	On March 9, 2022 the city held its 2nd Public Hearing concerning the FY 2022-2026 Consolidated Plan and FY 2022-2023 Annual Action Plan during the city's City Council meeting. During the Audience of the Citizens comments were received.	Comments were received during the city council public hearing concerning the use of funds for the homeless. More specifically, an audience member requested additional information concerning the city's use of funds to aid the local homeless shelter, Serve City.	The city accepts and encourages feedback.	

Demo

7	Public Hearing	Non-targeted/broad community	The City received no comments during the public comment period or public hearing for the amendment of the FY22-23 Annual Action Plan.	The City received no comments during the public comment period or public hearing for the amendment of the FY22-23 Annual Action Plan.	No comments were received.	
---	----------------	------------------------------	---	---	----------------------------	--

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Hamilton's estimated housing and supportive services needs for the years 2022 through 2026 are based on the 2020 Census data for the city (as provided by HUD), 2008-2012 American Community Survey 5-Year (as provided by HUD), as well as consultation with the service providers and community residents.

The City of Hamilton consults with community residents and service providers in order to do a yearly Needs Assessment Survey. This assessment is done to ensure the City's plans and activities accurately reflect community needs by residents of the City of Hamilton. The Needs Assessment also provides a tool to address the priority of the community needs. The City also mails a Needs Assessment Surveys to local Service Providers and former CDBG and HOME subrecipients because of their in-depth knowledge of needs of local special populations. In the summer of 2021, the City created and distributed a survey that was mailed to five hundred (500) randomly selected Hamilton households coded by census tract in proportion to population. The surveys included a self-addressed stamped return envelope. The percentage of surveys that were completed and returned was approximately 5.4 percent. Since the Coronavirus Pandemic the city has had difficulty attaining feedback from community members via surveys.

Through the compilation of Survey and statistical data the population of Hamilton may be generally described as having the following characteristics; Increasing Household Size, Steadily Changing Racial Composition, Shift Toward an Older Age Distribution, Growing Number of Single Parent Households, and Economic Status of the Population.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Per data acquired through the City of Hamilton's AFH process the following analysis is provided:

Table 9 of the AFH - Demographics of Households with Disproportionate Housing Needs, reveals that within the jurisdiction Hispanics (53.52%) and Other Non-Hispanics (64.20%) experience housing burdens (problems) at a higher rate than any other race/ethnic group measured.

Within the region, Black, Non-Hispanics (45.67%) and Hispanics (39.78%) experience housing burdens at a greater rate than any other race/ethnic group measured.

Table 10 of the AFH - Demographics of Households with Severe Housing Cost Burden, reveals that within the jurisdiction Hispanics (30.99%) and Other, Non-Hispanics (40.57%) experience severe housing cost burdens at a greater rate than any other race/ethnic group measured.

Within the region, Black, Non-Hispanics (22.96%) and Native American, Non-Hispanics (23.72%) experience severe housing burdens at a higher rate than any other race/ethnic group measured.

Demographics	Base Year: 2009	Most Recent Year: 2017	% Change
Population	62,135	62,215	0%
Households	25,179	24,535	-3%
Median Income	\$38,564.00	\$42,360.00	10%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	4,745	4,065	5,490	2,800	7,435
Small Family Households	1,615	1,335	1,945	1,225	3,965
Large Family Households	240	265	310	260	505

Demo

Household contains at least one person 62-74 years of age	815	795	1,260	555	1,550
Household contains at least one person age 75 or older	605	865	975	350	495
Households with one or more children 6 years old or younger	880	805	730	510	595

Table 6 - Total Households Table

Data Source: 2013-2017 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	30	4	60	0	94	10	0	25	10	45
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	20	0	0	0	20	0	10	4	0	14
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	70	120	80	10	280	0	20	25	10	55
Housing cost burden greater than 50% of income (and none of the above problems)	2,120	270	50	0	2,440	555	355	70	15	995

Demo

Housing cost burden greater than 30% of income (and none of the above problems)	645	1,285	365	0	2,295	210	500	570	65	1,345
Zero/negative Income (and none of the above problems)	245	0	0	0	245	185	0	0	0	185

Table 7 – Housing Problems Table

Data 2013-2017 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	2,245	395	190	10	2,840	565	385	120	35	1,005
Having none of four housing problems	1,055	1,905	2,100	915	5,975	445	1,380	3,075	1,845	6,745
Household has negative income, but none of the other housing problems	245	0	0	0	245	185	0	0	0	185

Table 8 – Housing Problems 2

Demo

Data 2013-2017 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	
NUMBER OF HOUSEHOLDS								
Small Related	1,015	625	155	1,795	190	255	235	
Large Related	185	130	25	340	45	45	10	
Elderly	560	370	55	985	380	465	295	
Other	1,120	525	180	1,825	160	110	115	
Total need by income	2,880	1,650	415	4,945	775	875	655	

Table 9 – Cost Burden > 30%

Data 2013-2017 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	
NUMBER OF HOUSEHOLDS								
Small Related	830	120	0	950	165	80	10	
Large Related	130	0	0	130	20	0	0	
Elderly	425	80	0	505	280	240	60	
Other	835	75	50	960	105	35	15	
Total need by income	2,220	275	50	2,545	570	355	85	

Table 10 – Cost Burden > 50%

Data 2013-2017 CHAS
Source:

5. Crowding (More than one person per room)

	Renter	Owner
Consolidated Plan	HAMILTON	25

Demo

	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	
NUMBER OF HOUSEHOLDS										
Single family households	45	75	55	10	185	10	30	25	10	
Multiple, unrelated family households	55	45	25	0	125	0	4	4	0	
Other, non-family households	0	0	0	0	0	0	0	0	0	
Total need by income	100	120	80	10	310	10	34	29	10	

Table 11 – Crowding Information – 1/2

Data Source: 2013-2017 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source
Comments:

Describe the number and type of single person households in need of housing assistance.

Data remains limited on the housing needs in the city for single individuals. Data from the 2019 American Community Survey was analyzed and determined that 34.1% of the households in the city are made of single individuals. Ultimately, single person households are subject to the same housing burdens and costs as the larger population. Yet single person households may be more likely to experience homelessness after being unable to address housing cost burdens due to the limitation of a one person income.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Demo

Table 13 - Disability by Type, reveals that individuals with ambulatory difficulty (9.35%) continue to make up the highest percentage of individuals with disabilities in the city. The cognitive difficulty is second to an ambulatory disability, at a rate of 7.22%. Additional disabilities in the cci include independent living difficulty (6.78%), hearing difficulty (3.19%), self--care difficulty (3.29%), and vision difficulty (2.69%). Within the region, ambulatory difficulty (6.62%) is also the most prevalent disability, and cognitive difficulty (5.11%) is also second. Map 14 - Disability by Type does not appear to reveal areas of segregation by disability type in the city. The regional map appears to reveal an even distribution of individuals with disabilities. Yet, it is noticeable that in a few areas of R/ECAP, which are also areas of segregation of Black, non--Hispanics, there appear to be fewer individuals with disabilities.

The city has several assisted living facilities. Many of which are located in the 1st Ward of the city. There is obvious segregation of disability housing service providers in the 3rd and 4th Wards of the jurisdiction (see Map 1 - Google). The segregation is understandable given that major service providers for the jurisdiction are located in the 4th Ward. Proximity to the 4th Ward affords access to the City building (utility dept., fair housing services, etc.), county services (i.e. welfare, child support, etc.), Neighborhood Housing Services, banks, food banks, Salvation Army, United Way, YWCA, Community First Solutions, Primary Health Solutions, etc.

Disability and access to housing have revealed no areas of segregation based upon disability type. Nonetheless, it has been important to assess the population of persons with a disability to attempt to identify any areas with needed improvement.

The jurisdiction has a vast number of affordable housing and supportive service options for persons with disabilities. Community First Solutions (CFS) is one of the jurisdiction's largest service providers. Services offered by CFH include but are not limited to Psychiatric Services, Assertive Community Treatment (ACT), Community Based Case Management, Partial Hospitalization, Assisted Living, Case Management Services, Long-Term Healthcare, Medicated Assisted Treatment, Psychiatric Services, Relapse Prevention, etc. CBH provides services to individuals/families annually and provides permanent housing for families and children. Transitional Living, Inc. also provides both permanent and temporary housing for a person with disabilities (i.e. Pinecrest Group Home and the Treatment and Assessment Program (TAP)). The jurisdiction's local YWCA also provides residential services to women through their Goodman Place Program.

Service-only providers to persons with disabilities within the jurisdiction include Butler Behavioral Health, Catholic Charities of Southwestern Ohio, CDC Mental Health Services, Inc., Fort Hamilton Inpatient Adult Mental Health Program, LifeSpan, Inc., NAMI Butler County, St. Aloysius Cambridge, and St. Joseph Orphanage. Services offered by the above providers include but are not limited to Information Screening and Referral, Diagnostic Assessment, Individual/Group Counseling, Pharmacological Management (Medication), Emergency (Crisis Intervention or Hotline), Partial Hospitalization, Social and Recreational Services, Education, Consultation & Prevention, Forensic Evaluations, and CPST Services (Case Management).

What are the most common housing problems?

The four severe housing problems as measured by HUD and identified in the city include incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and/or housing cost burden greater than 50%.

Are any populations/household types more affected than others by these problems?

Recent data suggests similar housing needs exist. Per Table 9 Demographics of Households with Disproportionate Housing Needs households with "problems" are defined as housing units with one of four housing problems (i.e. incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 30%). Table 9 - Demographics of Households with Disproportionate Housing Needs, reveals that within the city Other, Non- Hispanics (64.20%) and Hispanics (53.52%) experience "housing problems" at a higher rate than any other race/ethnic group measured. The same is true for Other, non-Hispanics (42.72%) and Hispanics (42.25%) experiencing "severe housing problems". Note - Severe Housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 50%. Map 6 - Housing Problems households experiencing one or more housing burdens are scattered throughout the city. It is observed that Black, non-Hispanics experiencing housing burdens are segregated to the Second Ward of the city. In assessing Map 6 - Housing Problems (National Origin), it is noticeable that areas with a higher percentage of households with burden are also more integrated areas. Nonetheless, there appears to be no distinct pattern as it relates to national origin and housing burdens. Within the region, Black, non--Hispanics (45.67%), and Hispanics (39.78%) experienced housing problems at a greater rate than any other race/ethnic group measured. Revealing that within the city and the city Hispanics are more likely to experience housing problems.

Severe Housing Cost Burden is an additional housing need. Severe housing cost burden is defined as greater than 50% of income. Table 10 - Demographics of Households with Severe Housing Cost Burden, reveals that within the city Other, non-Hispanics (40.57%) and Hispanics (30.99%) experienced severe housing burdens at a greater rate than any other race/ethnic group measured. Dissimilar from the city, Black, non-Hispanics (22.96%) and Native American, non-Hispanics (23.72%) experience a more severe cost burden in the region. Data for the city and the region reveal that White, non-Hispanics experience the least housing cost burdens and severe housing problems.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Approximately 34.21% of the city's public housing units are households with children, 26.91% of the city's Project-based Section 8 units are households with children, and 43.74% of the HCV (Housing Choice Vouchers) in the city are households with children. It is obvious that there are more household with children residing in the city's HCV program.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Not available

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Severe Housing Cost Burden may be considered a cause of instability and increased risk of homelessness. Severe housing cost burden is defined as paying more than half of one's income for monthly housing costs (e.g. utilities, repairs, etc.). Table 10 - Demographics of Households with Severe Housing Cost Burden, reveals that within the jurisdiction Other, non-Hispanics (40.57%) and Hispanics (30.99%) experienced severe housing burdens at a greater rate than any other race/ethnic group measured. Dissimilar from the jurisdiction, Black, non-Hispanics (22.96%) and Native American, non-Hispanics (23.72%) experience a more severe cost burden in the region. Data for the jurisdiction and the region reveal that White, non-Hispanics experience the least housing cost burdens and severe housing problems.

Discussion

As the Coronavirus Pandemic and its effects on the economy continues to impact Hamilton's population causing the number of LMI households in the City to increase. In response the city will continue to provide support to organizations and projects that will encourage and increase the available housing stock for low-income residents. As the current housing stock ages the need for repairs will increase. Ultimately, also increasing the cost-burden for residents. Low- and moderate-income residents, who are often cost burdened, may continue to be faced with the burden of affording necessary repair work. As a result, excessive cost-burden has the potential to continue to be an issue in the city. The city will seek the feedback of the residents, housing organizations, and builders to identify the best methods for addressing cost burdens in the city.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The City of Hamilton no longer has an area of R/ECAP. Nonetheless, housing problems exist. More specifically, the four housing problems in the city include incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30-50%. Per the data below, approximately 3665 households with an income 0%-30% of area median income have one or more of the four identified housing problems. Unfortunately, more household within this income range have housing problems than homes without housing one or more housing problems. There are approximately 2565 households with an income of 30%-50% of the area median income that experience one or more of the four housing problems; 1250 households with an income of 50%-80% of the areas income experience one or more of the four housing problems. While only 110 households with an income greater than 80% of the area median income experience one or more of the four housing problems. After reviewing the data it becomes obvious that the greater the household income the fewer housing problems experienced.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,665	645	430
White	2,700	475	345
Black / African American	530	95	25
Asian	25	0	10
American Indian, Alaska Native	10	20	0
Pacific Islander	10	0	0
Hispanic	205	39	50

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,565	1,495	0
White	2,065	1,365	0
Black / African American	325	85	0
Asian	10	35	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	135	10	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,250	4,240	0
White	1,125	3,650	0
Black / African American	85	395	0
Asian	4	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	25	115	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	110	2,695	0
White	95	2,365	0
Black / African American	14	250	0
Asian	0	35	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	14	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

The city will continue its efforts to work with residents, housing providers, and developers to pursue methods to support low-income residents and aid them in addressing their housing problems.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Within the city and based upon the data below White, non-Hispanics experience the greatest number of one or more of the four housing problems across each level of are median income. Respectfully, White, non-Hispanics are the majority of the population. Nonetheless, Black, non-Hispanics experience the second greatest number of one or more of the four housing problems in the city (among those in the 0%-30%, 30%-50%, and 80%-100% of the area median incomes).

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,810	1,500	430
White	2,115	1,060	345
Black / African American	340	290	25
Asian	25	0	10
American Indian, Alaska Native	10	20	0
Pacific Islander	10	0	0
Hispanic	165	74	50

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
---------------------------------	---	--	---

Demo

Jurisdiction as a whole	780	3,285	0
White	540	2,890	0
Black / African American	150	255	0
Asian	0	45	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	80	65	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	310	5,175	0
White	305	4,470	0
Black / African American	0	480	0
Asian	4	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	140	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

80%-100% of Area Median Income

Demo

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	45	2,760	0
White	30	2,430	0
Black / African American	14	250	0
Asian	0	35	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	14	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

Per the below data the only race experiencing a disproportionately greater need and increased housing cost burden are White, non-Hispanic residents. Approximately 14690 White, non-Hispanic below the 30% area median income experience housing cost burden. While 3150 White, non-Hispanic persons within the 30%-50% area median income and 2710 White, non-Hispanic persons within the >50% area median income experience housing cost burden. Black, non-Hispanic, Asian, non-Hispanic, American Indian, Alaska Native, non-Hispanics, Pacific, Islander, non-Hispanic, and Hispanic household are all ten percentage points lower than the overall percentage of persons in the category as a whole.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	16,630	3,905	3,560	440
White	14,690	3,150	2,710	355
Black / African American	1,170	495	450	25
Asian	130	10	25	10
American Indian, Alaska Native	20	0	10	0
Pacific Islander	0	0	10	0
Hispanic	445	160	190	50

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2013-2017 CHAS

Discussion:

The city will continue its efforts to decrease housing burdens for all households in the community by addressing housing burdens reported to the Health Department; and facilitating conversations with property owners and residents to determine the best strategy to remedy the most common housing burdens.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Based upon the city's most recent Analysis of Impediments to Fair Housing it was determined that Black, Non-Hispanics and Hispanics have the lowest household incomes and also experience the most disproportionate needs in the city. For example, Other, Non-Hispanics (64.2%) and Hispanics (53.52%) experience housing problems at a higher rate than any other race/ethnic group. Through the information presented in the AI, it was observed that areas with a higher percentage of households with burden exist in more integrated areas of the city. Overall data suggested that Hispanics are more likely to experience housing problems.

In addition to assessing housing burdens, it was determined that there is an obvious disparity between the number of homeowners that are White, non-Hispanic and those that are non-White. Although there may be several reasons for the disparity, one that may be considered for further study may include disparities in and access to financial resources for home purchases (e.g. lending practices and/or availability, knowledge of lending practices among minorities, etc.). Feedback from community members during the AI revealed frustration as a Black, non-Hispanics community member attempting to secure housing. A similar disparity is seen among the number of renters within the jurisdiction. More specifically, approximately 77.56% (8,295) of the renters in the city are White, non-Hispanic, 15.33% (1,640) are Black, non-Hispanic, 3.55% (380) Hispanic, 0.61% Asian or Pacific Islander, 0.19% (20) Native American, non-Hispanic, and 2.81% (300) Other, non-Hispanic. Again, there remains a noticeable disparity between White, non-Hispanic renters and non-White, renters. Respectfully and, in spite of the data, it should be noted that White, non-Hispanics are the majority in the jurisdiction.

In conclusion and in assessing the community, it may be reasonably assumed that there are no specific income categories in which a racial or ethnic group has disproportionately greater needs; but there are racial and ethnic groups that are disproportionately experiencing improved housing needs and access to homeownership.

If they have needs not identified above, what are those needs?

The city has attempted to assess all identifiable needs among the racial and ethnic groups in the city. As such and at this time there are no additional needs that have been unidentified.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Demo

Historically, the jurisdiction is divided into six (6) wards. The greatest population of Black, non-Hispanic persons reside in the 2nd ward. While the 4th, 5th, and 6 north wards remain the most integrated areas of the jurisdiction. They each have a mixed population of Black, non-Hispanic, Hispanic, and Asian/Pacific Islander, non-Hispanic persons.

NA-35 Public Housing – 91.205(b)

Introduction

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	1,011	1,288	0	1,260	2	0	26

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	7,109	11,259	0	11,273	12,618	0	

Demo

Average length of stay	0	0	3	5	0	5	0	0
Average Household size	0	0	2	2	0	2	1	0
# Homeless at admission	0	0	21	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	148	140	0	139	0	0
# of Disabled Families	0	0	275	479	0	452	2	0
# of Families requesting accessibility features	0	0	1,011	1,288	0	1,260	2	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 24 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	719	688	0	667	2	0	19
Black/African American	0	0	286	598	0	591	0	0	7
Asian	0	0	4	0	0	0	0	0	0
American Indian/Alaska Native	0	0	2	0	0	0	0	0	0

Consolidated Plan

HAMILTON

40

Demo

Pacific Islander	0	0	0	2	0	2	0	0	0
Other	0	0	0	0	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 25 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	66	11	0	10	0	0	1
Not Hispanic	0	0	945	1,277	0	1,250	2	0	25

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 26 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Per data gathered during the AFH process it was determined that the city has approximately 549 Public Housing units, 296 Project-based Section 8 units, and 707 Housing Choice Voucher (HCV) units. In regards to housing for persons with disabilities the city has approximately 166 Public Housing units for persons with a disability, 48 Project-based units for persons with a disability and 186 HCV units for persons with a disability.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

There are approximately 87 individuals'/families on the Public Housing waiting list through BMHA as of 02/17/2022. 60% are non-elderly, non-disabled, 14% elderly, and 26% disabled. 62% are extremely low income, 30% very low income, and 8% low income. As of 1/11/2021 BMHA had approximately 1195 individuals/families on the Housing Choice Voucher waiting list. 95% are non-elderly, non-disabled, 5% elderly, and 29% disabled.

How do these needs compare to the housing needs of the population at large

Discussion

Please see above.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The City of Hamilton works cooperatively with the Butler County Housing and Homeless Coalition (which is apart of the Warren County Balance of State) to ensure priority needs of homeless persons and families. The City has worked to ensure that all aspects of the “Continuum of Care” are being adequately addressed. TAs a result, the City has continued to support aspects of the “Continuum”, funding of supportive services, emergency/temporary shelter assistance, facilities acquisition and transitional units has and will continue to be done to support the needs of the homeless.

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

1. Create new and permanent beds for chronically homeless persons;
2. Increase the percentage of homeless persons staying in permanent housing;
3. Increase percentage of homeless persons moving from temporary to permanent housing; and
4. Increase percentage of homeless persons becoming employed.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	4	35	0	0	0	0
Persons in Households with Only Children	0	1	0	0	0	0

Demo

Persons in Households with Only Adults	72	111	0	0	0	0
Chronically Homeless Individuals	27	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	4	7	0	0	0	0
Unaccompanied Child	0	1	0	0	0	0
Persons with HIV	0	3	0	0	0	0

Table 27 - Homeless Needs Assessment

Alternate Data Source Name:
Ohio Balance of State Continuum of Care

Data Source Comments:

Indicate if the homeless population is: Has No Rural Homeless

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Demo

Data collected during the January 2020 Point in Time Count (PIT) estimates reveals that of the 298 reported, 166 were in emergency shelters, 46 were in transitional housing. 39 households with children were represented in the total number. While 27 individuals were identified as chronically homeless.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	122	72
Black or African American	69	7
Asian	3	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	4	2
Not Hispanic	208	80

Data Source The numbers above reflect persons considered homeless during the 2020 PIT count, not just individuals considered
Comments: Chronically Homeless.

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Per the Point in Time (PIT) data collected approximately 223 household reported. 27 were considered chronically homeless and 196 not chronically homeless. 39 were adults with children, 183 adults only, and 1 children only household.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Per the PIT data collected 76 persons reported as Black African-American, 1 reported as Asian, 201 reported as White, 0 (zero) reported as American-Indian, Pacific Islander, and 1 reported as Don't Know/Refused.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Per the PIT data approximately 212 persons reported as sheltered, while 86 reported as unsheltered.

Discussion:

Based upon provided data it may be reasonably assumed that the City has a sufficient number of shelter beds to support the number of homeless persons.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Under CPD guidelines, HUD has set forth criteria for evaluating the housing needs of “special needs.” As defined by HUD, these would include households made up of large families, elderly, individuals with disabilities, battered women/families, person with HIV/AIDS, and homeless persons.

The only census data concerning special needs populations includes information revealing that 12.5% of persons in the City of Hamilton are under the age of 65 and have a disability. Additional special needs data is unavailable.

Describe the characteristics of special needs populations in your community:

Large-Families, Battered Families, and Drug/Alcohol dependent persons are a considered a part of the special needs population in Hamilton. These groups experience unique housing issues and needs that are consistently being identified and addressed by the city, local organization, and service providers.

What are the housing and supportive service needs of these populations and how are these needs determined?

The most recent point in time count data is from 2020 Of the two hundred twenty-one (298) reported, one hundred sixty-six (166) were in a shelter. Eighty-six (86) unsheltered. At the present, data has not been made available concerning the needs and demographics of the persons counted during the PIT count.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Based on an Ohio HIV/AIDS Surveillance Program from 2020 Butler County has a New Diagnosis of HIV infection rate of 5.2 per 100,000 Population (20 persons: 17 HIV, 3 HIV & later AIDS).

Discussion:

The city will aim to acquire more specific information and data concerning its special needs population.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

The following list of Public Services and their rank of a significant need, moderate need, or low need comes from the Five Year Consolidated Plan Update 2022-2026, Annual Action Plan 2022-2023 Public Input Survey. This information is also listed under the #1 Alternative Data Source and a copy of a blank surveys and the survey results are attached.

Public Parks and Recreational Facilities: Moderate Need by 44% of responses

Senior Centers: Moderate Need by 41% of responses

Youth Centers: Significant Need by 59% of responses

Neighborhood Facilities/Centers: Significant Need by 48% of responses

Homeless Facilities: Significant Need by 67% of responses

Health Facilities: Significant Need by 52% of responses

How were these needs determined?

Needs Assessment Survey: The City of Hamilton produces an annual Needs Assessment Survey. The assessment is done to ensure the City’s plans and activities accurately reflect community needs by residents of Hamilton. This Needs Assessment also provides a tool to address the priority of the community needs. The City created and distributed a survey that was mailed to approximately 500 randomly selected Hamilton households coded by census tract. The survey “return rate” was approximately 9.7 percent. The results of the mail survey are attached.

The City of Hamilton also posted the annual Needs Assessment Survey on the city’s website for a defined period. The survey results were tabulated independently of the mail survey to ascertain differences between the survey responses. During the defined period, approximately 4 months, there were 27 completed web surveys.

Describe the jurisdiction’s need for Public Improvements:

The following list of Public Improvements and their order of priority (i.e significant need, moderate need, or low need) are as follows:

Street Repaving/Repair - Significant Need - 81%

Homeless Facilities - Significant Need - 67%

Youth Center - Significant Need - 59%

Water/Sewer Improvements - Moderate Need - 52%

Health Facilities - Moderate Need - 52%

How were these needs determined?

The list of Public Improvements were contrived from feedback provided during the current Consolidated Planning process and survey responses collected during the planning process. The results from the survey are listed above.

Describe the jurisdiction's need for Public Services:

The following list of Public Services and their rank of a significant need, moderate need, or low need comes from the Five Year Consolidated Plan Update 2022-2026, Annual Action Plan 2022-2023 Public Input Survey. This information is also listed under the #1 Alternative Data Source and a copy of a blank surveys and the survey results are attached.

Drug/Substance - Significant Need - 78%

Mental Health Services - Significant Need - 74%

Services for Battered & Abused Spouses/Children - 67%

Youth Services/Programs - Significant Need - 63%

Crime Prevention - Significant Need - 63%

Employment/Job Training - Significant Need - 56%

Services for the Developmentally Disabled - Significant Need - 55%

Services for the Homeless - Significant Need - 52%

Health Services - Significant Need - 52%

Services for the Homeless - Significant Need - 52%

Health Services - Significant Need - 52%

How were these needs determined?

The list of Public Services were contrived from feedback provided during the Consolidated Planning process and survey responses and are listed above.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The City of Hamilton has prepared an Analysis of Impediments to Fair Housing Choice and Affordable Housing as well as an implementation plan for these activities. As an ongoing effort to make sure that impediments are being addressed, the City submitted an Analysis of Impediments in January 2022.

The city has also expanded outreach efforts to Spanish-speaking residents. Through partnerships with local social service agencies, the city anticipates continuing to provide “on-location” fair housing outreach services to the Spanish-speaking community. The city has a partnership with Housing Opportunities Made Equal and also has a city representative

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

Most recent census data states that the city has a total Occupancy Status of 27,392 (25,299, Occupied and 2,093, Vacant).

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	19,815	70%
1-unit, attached structure	1,260	4%
2-4 units	3,330	12%
5-19 units	2,645	9%
20 or more units	1,115	4%
Mobile Home, boat, RV, van, etc	240	1%
Total	28,405	100%

Table 31 – Residential Properties by Unit Number

Data 2013-2017 ACS
Source:

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	40	0%	380	4%
1 bedroom	260	2%	2,455	23%
2 bedrooms	3,720	27%	4,580	43%
3 or more bedrooms	9,785	71%	3,320	31%
Total	13,805	100%	10,735	101%

Table 32 – Unit Size by Tenure

Data 2013-2017 ACS
Source:

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The city is unaware if BMHA anticipates losing any of its affordable housing units. The city does not anticipate losing any affordable housing units not managed by BMHA. The city has partnered with and plans to continue to lend support to local housing providers (e.g. the YWCA).

Does the availability of housing units meet the needs of the population?

No. Through an analysis of the city's housing units it has been determined that the city has a continued need for available affordable housing units for rent and ownership.

Describe the need for specific types of housing:

Discussion

As detailed in the city's recent Analysis of Impediments, the city plans to continue to support the development of safe and affordable housing. Partnerships will be continued with the local housing providers and developers.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

As stated previously the city has a need for additional affordable housing units.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2017	% Change
Median Home Value	110,700	102,300	(8%)
Median Contract Rent	518	590	14%

Table 33 – Cost of Housing

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	3,165	29.5%
\$500-999	6,990	65.2%
\$1,000-1,499	525	4.9%
\$1,500-1,999	45	0.4%
\$2,000 or more	10	0.1%
Total	10,735	100.0%

Table 34 - Rent Paid

Data Source: 2013-2017 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	1,230	No Data
50% HAMFI	5,430	2,565
80% HAMFI	8,770	5,980
100% HAMFI	No Data	8,040
Total	15,430	16,585

Table 35 – Housing Affordability

Consolidated
Plan

HAMILTON

54

Data 2013-2017 CHAS
 Source:

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	584	670	884	1,223	1,414
High HOME Rent	584	670	884	1,223	1,414
Low HOME Rent	584	670	884	1,057	1,180

Table 36 – Monthly Rent

Data HUD FMR and HOME Rents
 Source:

Is there sufficient housing for households at all income levels?

Per the data above, the city has approximately 15430 affordable housing units; of the available units the majority of the units for renters are for persons/families at <80% HAMFI. While the majority of households for homeowners is <100% HAMFI. Nonetheless there is a noticeable disparity between the number of units available for persons with a household earning at <50% HAMFI compared to those with a household income of <80% HAMFI. More specifically, there are 5430 rental units for households earning <50% HAMFI and 8770 units for households earning <80% HAMFI. The difference is equally noticeable among owners at <50% HAMFI who account for 2565 homeowners and 5980 households at the <80% HAMFI income range.

How is affordability of housing likely to change considering changes to home values and/or rents?

Since 2009 the city has experienced a 8% decrease in the median home value and a 14% increase in the median contract rent. It is possible that as the economy rebounds from the Coronavirus Pandemic that the city will see an increase in the median home value as persons/households become more financially stable and more home are being sold.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

Per the data provided HOME rents and Fair Market Rent are equivalent. As such, it may be reasonably assumed that there will be zero to minimal impact on the city's strategies to produce or preserve affordable housing.

Note - The only statistic that differed is shown in 3 bedroom Low HOME Rents.

Discussion

The city will continue to assess up-to-date housing market data as it relates to city residents.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Definitions

The city considers "substandard conditions" and Severe Housing Problems as synonymous.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	2,610	19%	5,070	47%
With two selected Conditions	45	0%	200	2%
With three selected Conditions	0	0%	10	0%
With four selected Conditions	10	0%	0	0%
No selected Conditions	11,140	81%	5,450	51%
Total	13,805	100%	10,730	100%

Table 37 - Condition of Units

Data 2013-2017 ACS
Source:

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,330	10%	880	8%
1980-1999	1,375	10%	1,100	10%
1950-1979	6,125	44%	4,445	41%
Before 1950	4,975	36%	4,310	40%
Total	13,805	100%	10,735	99%

Table 38 – Year Unit Built

Data 2013-2017 CHAS
Source:

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	11,100	80%	8,755	82%
Housing Units build before 1980 with children present	510	4%	160	1%

Table 39 – Risk of Lead-Based Paint

Data 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)
 Source:

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 40 - Vacant Units

Data 2005-2009 CHAS
 Source:

Need for Owner and Rental Rehabilitation

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

The city has a fairly older housing stock. More specifically the majority of the homes were built in the mid-1900s. As such, it may be reasonably assumed, that unless demolished, repainted, and/or remodeled a noticeable number of the homes may have lead present.

Discussion

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The majority of the city's public and assisted housing is supported by Butler Metropolitan Housing Authority (BMHA). The city anticipates continuing its longstanding and prosperous relationship with BMHA.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			1,158	1,111			0	0	57
# of accessible units									

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 41 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

BMHA will continue and is responsible for administering the Comprehensive Public Housing Grant and Section 8 Voucher programs as well as operating low- income housing units. BMHA operates countywide and Hamilton City Council appoints one board member while the remaining members are selected by the County Commissioners. With the exception of units in Middletown, Ohio, BMHA owns and operates the majority of housing units located in the City of Hamilton. The city encourages all residents to participate in community planning efforts including public housing residents. The city also encourages public housing residents to be involved in the management of their units.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 42 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Over the years, BMHA has worked to restore and number of their older public housing units. Plans will continue to pursue funding and opportunities to continue efforts of restoration and revitalization of affordable housing units.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

BMHA may choose to conduct regular assessments of its housing stock to determine the properties most in need. Once complete proper planning will be conducted to make appropriate decisions for the improvement of living environments for low and moderate income residents.

Discussion:

The city may provide the necessary support to BMHA to aid in their continued efforts to provide affordable, safe, and available housing in the city.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

The City is a member of the Butler County Housing and Homeless Coalition, which is open to local service providers and those interested in issues that concern housing and homelessness in Butler County.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	93	0	0	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 43 - Facilities and Housing Targeted to Homeless Households

Alternate Data Source Name:
Ohio Balance of State Continuum of Care

Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The City is a member of the Butler County Housing and Homeless Coalition, which is open to local service providers and those interested in issues that concern housing and homelessness in Butler County. Below includes a list of local agencies and organizations that provide services to persons/families in the city.

- City of Hamilton- Municipality; Community Planning and Funding Support for Homeless Services; Law Enforcement
- City of Middletown- Municipality; Community Planning and Funding Support for Homeless Services; Law Enforcement
- Butler County- Community Planning; Shelter + Care Administration; Law
- Butler County Children Services- Child Welfare and Protection Services; Foster Care for homeless youth
- Butler Metropolitan Housing Authority- Permanent subsidized housing
- Butler Behavioral Health- Mental health; case management; housing
- Community Behavioral Health- Mental health; case management; housing
- LifeSpan- Financial literacy; guardianship
- Sojourner Recovery Services - Substance abuse treatment – inpatient; outpatient
- Transitional Living- Mental health
- Hope House Rescue Mission - Emergency shelter
- Serve City- Emergency shelter
- YWCA- Transitional shelter for women
- VA- VA services and referral
- Butler County Educational Services Center
- New Housing Ohio- Housing for SMI
- Family Resources Center- Emergency housing and referrals
- Offerings- Basic needs and referrals for emergency shelters

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

EMERGENCY SHELTER (ES) examples: Haven House, Serve City, & Family Promise. ES projects will have a participant average length of stay of approximately 40 days. It is estimated that at least 40% of participants in Emergency Shelter (ES) projects will move into permanent housing at exit. An estimated 50% of participants in ES projects will receive at least one source of non-cash benefits or health

insurance at program exit. Approximately 30% of adult participants in ES projects will gain or increase employment or non-employment cash income during the reporting period or at exit. ES projects anticipate no more than 15% of persons whom exit to permanent housing return to ES, SH, TH, Outreach, RRH, or PSH within six months of exit. ES anticipates no more than 20% of persons who exit to permanent housing return to ES, SH, TH, Outreach, RRH, or PSH within two years of exit. Data Source to determine compliance: HMIS

RAPID REHOUSING PROJECTS (RRH) examples: CDP. RRH projects will have a participant average length of stay of no more than 150 days. RRH projects will have a participant median length of stay of no more than 150 days. RRH projects will place participants into permanent housing with 21 days of project entry. At least 95% of participants in RRH projects will move into permanent housing at exit. At least 85% of participants in RRH projects will receive at least one source of non-cash benefits or health insurance at program exit. At least 60% of adult participants in RRH projects will gain or increase employment or non-employment cash income during the reporting period or at exit. RRH projects will have no more than 5% of persons who exited to permanent housing return to ES, SH, TH, Outreach, RRH, or PSH within six months of exit. RRH will have no more than 10% of persons who exited to permanent housing return to ES, SH, TH, Outreach, RRH, or PSH within two years of exit. Data Source to determine compliance: HMIS

Transitional Housing (TH) examples: YWCA. At least 83% of participants in TH projects will move into permanent housing at exit. At least 55% of adult participants in TH projects will gain or increase employment or non-employment cash income during the reporting period or at exit. At least 85% of adult participants in TH projects will receive at least one source of non-cash benefits or health insurance at program exit. TH projects will have a participant average length of stay of no more than 240 days. TH projects will have a participant median length of stay of no more than 240 days. TH projects will have no more than 7% of adults who exited to permanent housing return to ES, SH, TH, Outreach, RRH, or PSH within six months of exit. TH will have no more than 12% of adults who exited to permanent housing return to ES, SH, TH, Outreach, RRH, or PSH within two years of exit. Data Source to determine compliance: HMIS

PERMANENT SUPPORTIVE HOUSING (PSH) examples: Butler County (S+C). At least 90% of project participants remain in PSH project or exit to permanent housing (PH) as of the end of the reporting period or at program exit. At least 85% of adult participants in PSH projects will receive at least one source of non-cash benefits or health insurance at program exit. At least 70% of adult participants in PSH projects will gain or increase employment or non-employment cash income during the reporting period or at exit. PSH projects will have no more than 2% of persons who exited to permanent housing return to ES, SH, TH, Outreach, RRH, or PSH within six months of exit. PSH will have no more than 5% of persons who exited to permanent housing return to ES, SH, TH, Outreach, RRH, or PSH within two years of exit. Data Source to determine compliance: HMIS

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Per CPD guidelines, HUD has set forth criteria for evaluating the housing needs of so-called “special populations.” As defined by HUD, special needs populations including persons who are frail and non-frail elderly, persons with physical, mental, or behavioral disabilities, persons with HIV/AIDS, and persons with alcohol or drug addictions. Current census data does not report on “special needs populations.” Instead, in formulating ideas about the needs of these groups, information from local social service agencies was utilized. The local data indicates that the city’s “special needs population” has increased over the past years. It should be noted that many local social service agencies with available data, serve not only the City but also the local area including the county (Butler).

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Per the PIT data of the 298 persons counted approximately 79 reported being diagnosed with mental illness and 78 reported as being diagnosed with a Substance Use Disorder. Per census data 15.7% of the total population are 65 years and older.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The city provides funding and/or works with local service providers that serve a broad range of populations including, but not limited to, the elderly/frail, persons with disabilities (mental, physical, developmental), persons with alcohol and/or drug addictions, persons with HIV/AIDS and their families, and public housing residents. Service providers include, but may not be limited to, the Victim's Advocacy Program through the Hamilton Law Department, the YWCA's residential and domestic violence programs, homeless services through Serve City, and special needs rental housing through Partnerships for Housing.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The city provides funding and/or works with local service providers that serve a broad range of populations including, but not limited to, the elderly/frail, persons with disabilities (mental, physical,

developmental), persons with alcohol and/or drug addictions, persons with HIV/AIDS and their families, and public housing residents.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

These Service Providers include but are not limited to Victim's Advocacy Program through the Hamilton Law Department/Center for Family Solutions, Life Skills and Housing Supportive Residential Care through the YWCA of Hamilton, and Homeless services through Serve City, special needs rental housing through Partnerships for Housing, transitional housing through Neighborhood Housing Services of Hamilton, Inc.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Two factors that affect the affordability of housing in a community are local property taxes and utility costs. According to the book, **Rates of Taxation in Butler County, Ohio Tax Year 2021**, the taxes in the City of Hamilton are relatively low. For example, Hamilton’s taxes were 58.07 mills as compared to 54.38 mills for Fairfield City; 66.99 for Middletown, 95.03 for Liberty, and 43.37 mills in the City of Oxford.

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

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The Economic Development Department for the City of Hamilton is vital to the growth of the city. It is imperative that the city development partnerships that aid in the creation of employment opportunities that provide a livable wage, improves neighborhoods, and promotes the growth of local businesses. In addition to promoting employment, businesses, and neighborhoods; the city anticipates promoting educational and training opportunities for younger persons to aid in their inclusion into society.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	47	5	0	0	0
Arts, Entertainment, Accommodations	3,498	2,493	15	18	3
Construction	1,409	420	6	3	-3
Education and Health Care Services	4,371	3,874	19	28	9
Finance, Insurance, and Real Estate	1,624	517	7	4	-3
Information	311	127	1	1	0
Manufacturing	3,341	2,346	14	17	3
Other Services	799	390	3	3	0
Professional, Scientific, Management Services	1,795	560	8	4	-4
Public Administration	0	0	0	0	0
Retail Trade	3,556	2,159	15	15	0
Transportation and Warehousing	1,031	298	4	2	-2
Wholesale Trade	1,681	871	7	6	-1
Total	23,463	14,060	--	--	--

Table 45 - Business Activity

Data 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)
Source:

Labor Force

Total Population in the Civilian Labor Force	29,125
Civilian Employed Population 16 years and over	26,435
Unemployment Rate	9.30
Unemployment Rate for Ages 16-24	35.85
Unemployment Rate for Ages 25-65	5.21

Table 46 - Labor Force

Data 2013-2017 ACS
Source:

Occupations by Sector	Number of People
Management, business and financial	4,290
Farming, fisheries and forestry occupations	1,170
Service	3,570
Sales and office	6,920
Construction, extraction, maintenance and repair	2,260
Production, transportation and material moving	1,745

Table 47 – Occupations by Sector

Data 2013-2017 ACS
Source:

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	15,490	62%
30-59 Minutes	8,155	33%
60 or More Minutes	1,360	5%
Total	25,005	100%

Table 48 - Travel Time

Data 2013-2017 ACS
Source:

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,740	280	2,175
High school graduate (includes equivalency)	7,890	675	3,915
Some college or Associate's degree	7,000	555	2,260
Bachelor's degree or higher	3,950	115	745

Table 49 - Educational Attainment by Employment Status

Data 2013-2017 ACS
Source:

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	100	205	280	430	590
9th to 12th grade, no diploma	865	640	860	1,775	1,115
High school graduate, GED, or alternative	2,910	3,240	2,765	6,475	4,590
Some college, no degree	1,865	2,155	1,745	3,250	1,545
Associate's degree	180	700	645	1,320	215
Bachelor's degree	280	925	760	1,670	1,110
Graduate or professional degree	0	210	385	860	490

Table 50 - Educational Attainment by Age

Data 2013-2017 ACS
Source:

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	23,715

High school graduate (includes equivalency)	28,180
Some college or Associate's degree	35,550
Bachelor's degree	44,900
Graduate or professional degree	55,355

Table 51 – Median Earnings in the Past 12 Months

Data 2013-2017 ACS
Source:

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Education and Health Care Services (4371), Arts, Entertainment, and Accommodations (3498), Retail Trade (3556), and Manufacturing (3341) are the top business sectors in the city, with Education and Health Care Services being the highest.

Describe the workforce and infrastructure needs of the business community:

Per data on the Business Activity Table the city has an undersupply (more jobs than workers) of labor in Arts, Entertainment, and Accommodations (3), Education and Health Care Services (9), and Manufacturing (3).

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The Coronavirus Pandemic may be the cause of the undersupply of workers in the Education and Health Care Services sector, Art, Entertainment, and Accommodations, and also Manufacturing sectors. Each industry was negatively impacted by the pandemic. More specifically, fewer people traveled and/or participated in large scale events during the pandemic. Ultimately causing less of a need and participation in art, entertainment and travel events.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Data from above reveals that through the attainment of a Bachelors degree a persons median earnings increases by nearly \$10,000.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Employers in the city have access to students from Miami University, Miami University Hamilton, Butler Tech, University of Cincinnati, Xavier University, Wright State University, and number of smaller regionally located specialized schools. Having these educational institutions located in Hamilton or in close proximity to Hamilton provide a large pool of possible workforce candidates.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Discussion

The city will continue to promote discussions concerning non-housing community development.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

What are the characteristics of the market in these areas/neighborhoods?

Areas/neighborhoods in the city where racial or ethnic minorities or low-income families are concentrated are typically areas with less access to proficient schools, less access to employment opportunities, a lower job proximity index, a lower environmental health index, and disproportionate housing needs.

Are there any community assets in these areas/neighborhoods?

Service providers and community centers are more accessible in areas/neighborhoods in the city where racial or ethnic minorities or low-income families are concentrated.

Are there other strategic opportunities in any of these areas?

Areas/neighborhoods in the city with concentrations of racial or ethnic minorities have experience a higher number of demolitions of slum/blighted properties. As such, the said areas create an opportunity for the new construction of homes and businesses.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Per recent census data (2015-2019) approximately 88.1% of the city's population have a computer and 81.4% have a broadband internet subscription. The city's top internet providers are Spectrum, Cincinnati Bell, and Viasat. In 2014, the city entered into an agreement to provide broadband services to local schools. Since this agreement the city has also expanded its efforts to bring fiber optics availability to the local businesses, local government, establishments, and residents.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The city has a number of available broadband providers to choose from. They include, but are not limited to, Spectrum, Cincinnati Bell, T-Mobile, Viasat, Ultra Home Internet, and BluSky Wireless.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

As the city of Hamilton is situated more inland an increase natural hazard risks associated with climate change has not been explicitly observed.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

The city is not at risk of an increased rate of natural hazards as associated with climate. More specifically, the city is not at risk of wild fires, earthquakes, hurricanes, etc. The most pressing risk to the city may include flooding concerns.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The city of Hamilton will continue to focus its efforts in four (4) principle areas: Housing, Economic Development, Public Services, and Public Facility Improvements.

Housing: The development and maintenance of the city's affordable housing stock is imperative to community development and increased quality of life for the residents. As a result, the city will continue its home repair program, housing rehabilitation and other stabilization and development programs. The city will continue to partner with local agencies to develop affordable housing; especially for very low, low, moderate income households. The city will also continue its commitment to clearing vacant, unsafe, and blighted residential properties that adversely impact the health, safety, and welfare of the community.

Economic Development: The city will continue its efforts to expand economic opportunities in the community that encourage investments, the retailing and creation of jobs, and revitalizing the city's business districts. Additionally, the city will continue to provide access to the Revolving Loan Fund (RLF) to local businesses.

Public Service: The anticipates continuing its effort to provide support to local public service providers that address the unique needs of LMI residents in the community. Programs, including but not limited to, fair housing, homeless services, affordable public transportation, youth & senior recreation, and crime prevention/victim advocacy.

Public Facility Improvements: Improvements to the city's public facilities and infrastructure may be designated with the full intentions of serving and benefitting LMI residents. Improvements are crucial for community development, safety, and improving the quality of life of the residents.

The above principal areas will be assessed to ensure consistency with the data received during public meetings, survey data/feedback (e.g. Annual Needs Survey), and ongoing conversations with service providers, stakeholders, and local government representatives. In addition to the said efforts the city will concentrate efforts to meeting the three National Objectives identified by HUD. They include: 1) Benefitting low- and moderate income persons; 2) Aid in the prevention or elimination of slums or blight; and 3) Meet and urgent need.

Lastly, the below list of needs were identified as Significant Needs during the Consolidated Planning process:

Public Services:

Consolidated
Plan

HAMILTON

78

Drug/Substance Abuse Service;

Youth Services/Programs;

Employment/Job Training;

Mental Health Services;

Services for the Developmentally Disabled; Crime Awareness/Prevention; and

Services for Battered & Abused Spouses/Children.

Public Facility Improvements:

Street Repaving/Repair;

Youth Centers; and

Homeless Facilities.

Note: In preparing the Consolidated Plan the City of Hamilton utilized two available waivers provided by HUD. More specifically, Waiver: Public Hearings - Provisions found at 24 CFR 91.105(e)(1) and (2), 24 CFR 91.115(b)(3)(i), 24 CFR 91.401, and 24 CFR 570.431, 570.441, and 570.486(a)(5) to the extent necessary to prevent the spread of the Coronavirus. Waiver: Pre-award Costs - Allowing grantees to treat the effective date of the grant agreement as the program start date or the date that the consolidated plan/action plan (with actual allocation amounts) is received by HUD whichever is earlier. Pre-award costs may be permitted contingent upon the city's approval. The city has asked that HUD waives 24 CFR 92.212(b) to the extent necessary to permit eligible pre-award costs to be incurred as of the beginning of the program year or the date the consolidated plan describing the HOME allocation to which the costs will be charged is received by HUD.

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

Geographic Area

Table 52 - Geographic Priority Areas



General Allocation Priorities

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

The city allocates investment, specifically housing opportunities, via feedback acquired during the Public Comment period for the Consolidated Plan/Annual Action Plan. Additionally, the city gathers input from local housing providers, developers, and local stakeholders.

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

Priority Needs

Table 53 – Priority Needs Summary

A table with 10 rows and 2 columns. The first column contains white cells, and the second column contains black cells, indicating redacted content.

Narrative (Optional)

Priority Needs for the city were identified via the city's public needs assessment. The assessment included a public survey (online and mail), public meetings, and feedback from local service providers, organizations, and city representatives.

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)	Recent data and discussions suggests that the city is experiencing an increased demand for affordable housing for extremely low and low income residents. More specifically over the past two (2) years the city has committed funds to assist residents through rental assistance programs. It has been made obvious by the number of requests that rental assistance is needed in the community. The city anticipates providing support to and corresponding with local housing developers and investors to increase/develop additional affordable TBRA units in the community.
TBRA for Non-Homeless Special Needs	
New Unit Production	The city has and anticipates continuing to support the production of housing units for rent and homeownership through its partnerships with local housing providers (e.g. NHH, S.E.L.F., and BMHA). The addition/production of new units will aid in addressing the lack of affordable housing options in the city.
Rehabilitation	As opportunities become available the city will provide support for the rehabilitation of housing units. The rehabilitation of housing units has the potential to increase housing options in the city and also improve the older housing stock.
Acquisition, including preservation	As opportunities become available and prove to improve the housing market in the city; the city will provide support towards acquisition opportunities.

Table 54 – Influence of Market Conditions

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

Introduction

The Fiscal Year 2022-2026 Consolidated Plan is the City of Hamilton’s strategic planning document that addresses housing assistance, economic development, public services and other community development needs. This also includes the Annual Action Plan Update for Fiscal Year 2022-2026. The City of Hamilton will use Community Development Block Grants (CDBG) and HOME entitlement funds to help meet the needs of low and moderate income citizens as well as eliminate slum and blight.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,350,621	29,995	429,646	1,810,263	5,522,465	FY 2022-2023 allocation of funds from HUD announced 5/13/2022 in the amount of \$1,350,621. Program income includes \$29995.15 as Misc PI (\$6500), CRLF (\$8000), and HRLF (\$15495.15)

HOME	public - federa l	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	399,573	17,000	0	416,573	1,866,080	FY 2022-2023 allocation of funds from HUD announced 5/13/2022 in the amount of \$399,573 EN. Available for programming is \$17,000 (Total available) (as of 1/31/2022)
General Fund	public - local	Other	49,947	0	0	49,947	199,788	12.5% HOME Match funds from the city's General Funds.

Table 55 - Anticipated Resources

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

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

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

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

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

This section is *Not Applicable* to the City of Hamilton.

Discussion

The Finance Department continues to take a more strategic approach on funding to opportunities to meet the greatest needs such as housing, economic development, vacant/dilapidated housing demolition, street resurfacing and repair, and homeless support services. In addition, the Department is taking a more focused approach on implementing portions of the City's Strategic Plan to foster renewed investment and economic development/job creation in the community which include Economic Development Revolving Loan Fund, Design Assistance for new and/or expanding businesses.

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
Butler County Homeless & Housing Coalition	Continuum of care	Homelessness Public Housing Rental	Region
NEIGHBORHOOD HOUSING SERVICES OF HAMILTON	CHDO	Ownership Rental	Region
SELF (SUPPORTS TO ENCOURAGE LOW-INCOME FAMILIES)	Non-profit organizations	Non-homeless special needs neighborhood improvements public services	Jurisdiction
HOUSING OPPORTUNITIES MADE EQUAL	Regional organization	Non-homeless special needs public services	Region
Great Miami Valley YMCA	Non-profit organizations	Non-homeless special needs public services	Jurisdiction
YWCA	Non-profit organizations	Homelessness Non-homeless special needs Rental public services	Jurisdiction
Transit Alliance of Butler County	Departments and agencies	Economic Development	Region
Serve City	Non-profit organizations	Homelessness Rental	Jurisdiction
Hamilton Parks Conservancy	Departments and agencies	Planning	Jurisdiction
Fitton Center for Creative Arts	Community/Faith-based organization	Non-homeless special needs public services	Jurisdiction
Historic Hamilton, Inc	Non-profit organizations	Non-homeless special needs public facilities	Jurisdiction

OPEN DOOR PANTRY	Non-profit organizations	public services	Jurisdiction
------------------	--------------------------	-----------------	--------------

**Table 56 - Institutional Delivery Structure
Assess of Strengths and Gaps in the Institutional Delivery System**

Public input gathered during the planning process for this report and also during the Analysis of Impediments (AI) suggests that one of the gaps in the institutional delivery system is a lack of communication and collaboration amongst the above listed agencies. Nonetheless, a major strength in their individual abilities to access a diverse population of individuals/families in the jurisdiction.

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		
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		

Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	

Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X		
Education	X		
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	
Life Skills	X		
Mental Health Counseling	X	X	
Transportation	X	X	

Other

--	--	--	--

Table 57 - Homeless Prevention Services Summary

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)

The City of Hamilton provides funding and works with a number of Service Providers that serve a broad range of populations which include elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, and public housing residents. Local service providers include, but are not limited, to Victim's Advocacy Program through the Hamilton Law Department, Life Skills and Housing Supportive Residential Care through the YWCA of Hamilton, and Homeless services through Serve City. Additional healthcare providers (not funded by the city) also provide medical, treatment, and supportive services to persons/families in the city.

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

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

The city maintains continuous communication with local social service providers by having representatives serve on local committees and boards that discuss current topics applicable to the community. As a result, the community members and city representatives work collaboratively to identify issues, priorities, strategies and action plans to assist Hamilton citizens. The anticipates continuing to identify and close gaps in communication through consultation with citizens, community service providers and local public institutions, private industry, and nonprofit organizations.

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 following describes the roles of groups in the institutional structure.

Public Institution: The city's Finance Department, Neighborhood Development Division administers both the CDBG and HOME programs. Funds will be used for a variety of activities including, but not limited to, home repairs, home buyer assistance, capital improvements, economic development and technical assistance to nonprofits and public services providers. The city may apply for State Low Income Housing

Tax Credits (LIHTC) or other forms of state assistance as specific projects develop. Butler Metropolitan Housing Authority (BMHA) will continue and is responsible for carrying out the Comprehensive Public Housing Grant and Section 8 Voucher programs as well as operating low-income housing units. BMHA operates countywide and Hamilton City Council appoints one board member and the remaining are selected by the County Commissioners. With the exception of units in Middletown, Ohio, BMHA owns and operates the majority of housing units located in the jurisdiction. The city encourages all residents to participate in community planning efforts including public housing residents. The city also encourages public housing residents to be involved in the management of their units.

Private Industry: Private sector involvement includes financial institutions providing assistance via mortgage loans to assist with private rehabilitation (owner and renter) and a first-time homebuyer program operated by Neighborhood Housing Services of Hamilton.

Nonprofit Organizations: Local nonprofit organizations provide a variety of services to the community members including, but not limited to, housing assistance, rehabilitation, rental assistance, homebuyer assistance, services to the elderly, homeless and special needs population. Nonprofit and direct housing providers include: Neighborhood Housing Services of Hamilton, Supports to Encourage Low-Income Families (S.E.L.F.), People Working Cooperatively (PWC), Greater Miami Valley YMCA, ArtSpace, Habitat for Humanity of Greater Cincinnati, Serve City, Partnerships for Housing, Inc., and the YWCA. Additionally, the city works with nonprofit organizations that provide direct public services not only including housing assistance but also health, domestic violence, homeless prevention, youth programs, education, fair housing, and transportation services. Nonprofit organizations that qualify as Community Housing Development Organizations (CHDO's) have the opportunity to operate construction of rental and first-time homebuyer programs. The CHDO for the city is Neighborhood Housing Services of Hamilton (NHS). The city continues to provide needed technical assistance to NHS nonprofit and will continue to build partnerships with other agencies in the community as the Strategic Plan is refined.

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	Public Services	2022	2026	Non-Housing Community Development	Low/Moderate Income Areas All HUD eligible areas within the City of Hamilton	Public Services	CDBG: \$720,000	Public service activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted
2	Economic Development	2022	2026	Non-Housing Community Development	All HUD eligible areas within the City of Hamilton	Economic Development	CDBG: \$149,971	Jobs created/retained: 5 Jobs Businesses assisted: 2 Businesses Assisted
3	Clearance & Demolition	2022	2026	Non-Housing Community Development	All HUD eligible areas within the City of Hamilton	Clearance & Demolition	CDBG: \$803,748	Buildings Demolished: 5 Buildings

4	Public Facilities Improvements	2022	2026	Non-Housing Community Development	All HUD eligible areas within the City of Hamilton	Public Facility Improvements	CDBG: \$2,075,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 31000 Persons Assisted
5	Affordable Housing - Homeowner Assistance	2022	2026	Affordable Housing	Low/Moderate Income Areas All HUD eligible areas within the City of Hamilton	Housing	CDBG: \$914,887 HOME: \$1,057,983 General Fund: \$249,735	Homeowner Housing Added: 3 Household Housing Unit Homeowner Housing Rehabilitated: 40 Household Housing Unit Direct Financial Assistance to Homebuyers: 20 Households Assisted
6	Development of Affordable Rental Housing	2022	2026	Affordable Housing	Low/Moderate Income Areas All HUD eligible areas within the City of Hamilton	Housing	HOME: \$925,000	Rental units constructed: 4 Household Housing Unit

7	Address Fair Housing Concerns	2022	2026	Fair Housing	All HUD eligible areas within the City of Hamilton	Fair Housing	CDBG: \$60,000	Other: 200 Other
8	Transportation	2022	2026	Non-Housing Community Development	Low/Moderate Income Areas All HUD eligible areas within the City of Hamilton	Transportation	CDBG: \$75,000	Other: 900 Other
9	Aid in Addressing Homelessness	2022	2026	Homeless	Low/Moderate Income Areas All HUD eligible areas within the City of Hamilton	Homeless Activities	CDBG: \$110,000	Other: 500 Other

10	Planning & Administration	202 2	202 6	All CDBG & HOME Planning & Administration	Low/Moderate Income Areas All HUD eligible areas within the City of Hamilton	Public Services Public Facility Improvements Economic Development Homeless Activities Transportation Fair Housing Planning & Administration Clearance & Demolition	CDBG: \$1,994,475 HOME: \$299,670	Other: 10000 Other
----	---------------------------	----------	----------	---	--	--	--------------------------------------	-----------------------

Table 58 – Goals Summary

Goal Descriptions



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)

The city estimates that during the current Consolidated Planning period (2022-2026) that approximately ## extremely low, low-moderate income households may receive affordable housing support based upon the HOME 91.315(b)(2) definitions of affordable housing. The city anticipates continuing funding for the following programs: the Home repair Program, Down-Payment & Closing Cost Assistance, and/or acquisition and/or new construction.

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)

The city's public housing is provided and managed by Butler Metropolitan Housing Authority (BMHA). BMHA operates throughout Butler County and the City of Hamilton. Approximately fifty percent (50%) of all of BMHA's public housing units are located within the city's limits. The city and BMHA anticipates continuing discussions concerning the increase in the number of accessible units. After discussions and examinations of the current housing stock both parties will determine whether a true need to increase units is necessary.

Activities to Increase Resident Involvements

The city gathers feedback via surveys and public meetings during the Consolidated Planning/Annual Action Planning process¹.

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

No

Plan to remove the 'troubled' designation

The agency has not been assigned a troubled designation.

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

Barriers to Affordable Housing

Two factors that affect the affordability of housing in a community are local property taxes and utility costs. According to the book, [Rates of Taxation in Butler County, Ohio Tax Year 2021](#), the taxes in the City of Hamilton are relatively low. For example, Hamilton's taxes were 58.07 mills as compared to 54.38 mills for Fairfield City; 66.99 for Middletown, 95.03 for Liberty, and 43.37 mills in the City of Oxford.

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

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The city utilizes a "one-stop" permitting process to expedite permitting and review procedures while also avoiding costly delays. The city's zoning code is not unduly restrictive. More specifically, the city's minimum lot size for the least dense residential zoning district (10,000 sq ft) is well below the region's (Cincinnati-10,000 sq ft min, Middletown-20,000 sq ft min, Fairfield-12,000 sq ft min). The city continues to encourage the development of mixed-use affordable housing that may include residential housing at higher densities in certain areas, including CORE Area and affordable new single family construction in neighborhoods. The city's subdivision regulations require the installation of sidewalks, curbs/gutters, and storm water retention methods, which may increase housing costs. However, the city's regulations are not unduly harsh nor are they more restrictive than those in the region. In regards to infrastructure requirements for subdivisions, they are also at the minimum standard to ensure public health, welfare and safety. Additionally, sidewalks, curb, and gutters promote walkability within and between neighborhoods for households with limited transportation options/funds. In an attempt to ease the construction costs for developers, the city's zoning code allows for Planned Unit Developments (PUD's), form-based mixed-use zoning, clustered housing, zero lot line zoning, and certain density bonuses. All being said, the city's policies and regulations do not significantly impact housing choice or affordability. As such, the city has not outlined a strategy for modification or amendment. The city will continue to regularly review policies/regulations to propose changes as deemed necessary.

SP-60 Homelessness Strategy – 91.215(d)

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

The City is a membership of the Butler County Housing and Homeless Coalition, which is open to providers and those interested in issues that concern housing and homelessness in Butler County. Their current membership and the services they provide are listed below.

City of Hamilton- Municipality; Community Planning and Funding Support for Homeless Services; Law Enforcement

City of Middletown- Municipality; Community Planning and Funding Support for Homeless Services; Law Enforcement

Butler County- Community Planning; Shelter + Care Administration; Law

Butler County Children Services- Child Welfare and Protection Services; Foster Care for homeless youth

Butler Metropolitan Housing Authority- Permanent subsidized housing

Butler Behavioral Health- Mental health; case management; housing

Community Behavioral Health- Mental health; case management; housing

LifeSpan- Financial literacy; guardianship

Sojourner Recovery Services - Substance abuse treatment – inpatient; outpatient

Transitional Living- Mental health

Hope House Rescue Mission - Emergency shelter

Serve City- Emergency shelter

YWCA- Transitional shelter for women

VA- VA services and referral

Butler County Success- Homeless liaison for schools

New Housing Ohio- Housing for SMI

Addressing the emergency and transitional housing needs of homeless persons

EMERGENCY SHELTER (ES) examples: Hope House, Serve City. ES projects will have a participant average length of stay of no more than 40 days. ES projects will have a participant median length of stay of no more than 40 days. At least 40% of participants in Emergency Shelter (ES) projects will move into permanent housing at exit. At least 50% of participants in ES projects will receive at least one source of non-cash benefits or health insurance at program exit. At least 30% of adult participants in ES projects will gain or increase employment or non-employment cash income during the reporting period or at exit. ES projects will have no more than 15% of persons who exited to permanent housing return to ES, SH, TH, Outreach, RRH, or PSH within six months of exit. ES will have no more than 20% of persons who exited to permanent housing return to ES, SH, TH, Outreach, RRH, or PSH within two years of exit.

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.

RAPID REHOUSING PROJECTS (RRH) examples: CDP. RRH projects will have a participant average length of stay of no more than 150 days. RRH projects may have a participant median length of stay of no more than 150 days. RRH projects may place participants into permanent housing with 21 days of project entry. At least 95% of participants in RRH projects may move into permanent housing at exit. At least 85% of participants in RRH projects will receive at least one source of non-cash benefits or health insurance at program exit. At least 60% of adult participants in RRH projects may gain or increase employment or non-employment cash income during the reporting period or at exit. RRH projects may have no more than 5% of persons who exited to permanent housing return to ES, SH, TH, Outreach, RRH, or PSH within six months of exit. RRH may have no more than 10% of persons who exited to permanent housing have the potential of returning to ES, SH, TH, Outreach, RRH, or PSH within two years of exit.

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

PERMANENT SUPPORTIVE HOUSING (PSH) examples: Approximately 85% of adult participants in PSH projects may receive at least one source of non-cash benefits or health insurance at program exit. About

70% of adult participants in PSH projects may gain or increase employment or non-employment cash income during the reporting period or at exit. PSH projects potentially have no more than 2% of persons who exited to permanent housing return to ES, SH, TH, Outreach, RRH, or PSH within six months of exit. PSH may have no more than 5% of persons who exited to permanent housing return to ES, SH, TH, Outreach, RRH, or PSH within two years of exit.

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

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

The City of Hamilton provides the following measures as applicable:

- 1) Completes a Lead Hazard Evaluation Notice Form
- 2) Completes a Lead-Safe Housing Rule Applicability Form
- 3) Completes a Lead-Safe Housing Rule Checklist for general compliance documentation
- 4) Completes a Lead-Safe Housing Requirements Screening Worksheet
- 5) A “Protect Your Family from Lead in Your Home” booklet is given to and signed by all owner/occupants having rehab work done on their property as applicable.

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

The results of several studies have indicated that children exposed, even moderately, to lead-based paint may develop permanent learning disabilities. The greatest concern is for young children (under the age of 7). The use of lead-based interior and exterior paints often occurred on structures constructed prior to 1978; and, generally speaking, its use was more prevalent on older (pre-1940) houses. Considering the age of the City's housing stock, and thus, the likelihood of an increased presence of lead-based paint hazards, Hamilton will respond to the problem of lead-based paint (LBP) hazards.

Utilizing methodology supplied by HUD, the potential numbers of LBP units occupied by low income households with children under seven years old are 404 renter units 450 owner occupied for a total of 854 units, or 3% of the total housing stock of Hamilton.

Additional information on this problem is based on records of the City of Hamilton's Health Division from 1990 to 1994. The data indicates that lead poisoning cases, which were treated by Hamilton's Health Department, were located in low income, minority neighborhoods. The neighborhoods with the highest concentration of children suffering from lead poison were all low- income target rehabilitation areas for the City of Hamilton. In the previous years, WIC had a grant for all children receiving WIC to be screened with a finger stick lead test. WIC has lost this funding and therefore is no longer doing screening. Current recommendations from the Ohio Department of Health have changed. Referrals are now made to the Health Division for all levels over 5 mg/dl. We do extensive teaching for parents whose children score between 5 and 10 micrograms per deciliter of blood.

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

The City has determined (through the Analysis of Impediments process) that some of the issues affecting poverty-level families includes but may not be limited to: location and type of affordable housing; the availability of affordable units in a range of sizes; and the availability, type, frequency, and reliability of public transportation.

The City partners with local housing providers, Neighborhood Housing Services of Hamilton (NHS) develops new and also maintain/expand housing unit availability within the City. For example, NHS provided down payment assistance to 19 extremely low/very low/low income households in the City. The home repairs aid in sustaining the home while also maintaining their integrity. Ultimately, this makes the homes safer and healthier for the low income resident(s) to reside. NHS's commitment aids the City in addressing the issue of increasing, and maintaining affordable housing in a range of sizes in various locations in the City.

Additionally, the City continues to partner and provide funding to local transportation provider, Butler County Regional Transit Authority (BCRTA). Through the partnership BCRTA has expanded its routes within and outside of the City to provide transportation to employers and resources in and surrounding the community.

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

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

The City of Hamilton has developed long-term priorities (goals and objectives) through the Consolidated Planning process that seeks to reduce the incidence of poverty among individuals and families. These priorities focus on Housing, Economic Development, Public Service and Public Facility Improvements.

HOUSING

The city's housing priorities to reduce poverty and assist very low, low and moderate-income residents include the following:

ECONOMIC DEVELOPMENT

The city's Economic Development priorities to reduce poverty and assist very low, low and moderate-income residents include the following:

1. Increase the capacity of the city to attract new and retain existing businesses that create long-term job opportunities for low- and moderate- income residents;
2. Increase the capacity of neighborhood commercial areas and business districts to retain and expand job opportunities for low and moderate income persons; and
3. Expand the use of economic development opportunities to encourage new development and redevelopment and combat poverty.

PUBLIC SERVICE

The city's Public Service priorities to reduce poverty and assist very low, low and moderate-income residents include the following:

1. Provide a suitable living environment that includes improving the safety and livability of neighborhoods and increasing access to quality public and private facilities and services;
2. Assist agencies that increase transportation services for residents;
3. Support crime prevention and reduction activities in low- and moderate- income neighborhoods;
4. Support organizations and agencies that assist the homeless with basic services and program;
5. Provide and support fair housing activities;
6. Provide technical support and assistance to organizations through resource development; and
7. Provide support and assistance to healthcare organizations and agencies that benefit low- and moderate- income residents.

PUBLIC FACILITY IMPROVEMENTS

The city's Public Facility Improvement priorities to reduce poverty and assist low, low and moderate-income residents include the following;

1. Increase the capacity of the city to positively change the social and physical conditions of low- and moderate- income neighborhoods experiencing blighting influence through programs tailored to meet the specific needs of the individual neighborhood; and
2. Increase the number of and the quality of opportunities provided for residents to actively plan and implement physical and social improvements in their neighborhood by enhancing public outreach and participation.

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

Through dialogue with the city's established Community Development partners programs and projects are reviewed on the basis of their ability to meet the established priorities. The city reviews not only for the ability to meet these priorities but also how they compliment or coordinate with other existing programs or projects.

The city feels that poverty reduction is an ongoing process. City representatives assess data concerning the unemployment rate, census income information, and local income tax information, homeless/shelter data, and additionally relevant information to accurately predict the need for affordable housing. Preceding the review of data the city facilitated discussions with local residents, service providers, housing developers, and local stakeholders to identify goals, programs, and policies that may aid in maintaining and developing additional affordable housing.

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

Subrecipients

The City of Hamilton has established a monitoring schedule with its subrecipients. The subrecipients were monitored once a year during the program year. During FY 2021-2022, subrecipients were monitored virtually (due to the continuing Coronavirus Pandemic) program year depending on the progress of their program and technical assistance needed. CDBG compliance issues reviewed during this visit included, but were not limited to: financial management systems, procurement procedures, identification of CDBG property and assets, and submission of monthly progress reports (see attached Monitoring Checklist). Upon completion of the monitoring visit, correspondence is sent to each subrecipient outlining any areas of concern, and the means to address these concerns.

City Departments

Representatives of the city's Neighborhood Development Division (NDD) monitors the performance of the City Departments against goals and performance standards as stated in our jointly executed Memorandum of Agreement. Additionally, NDD verifies environmental records, financial management, fair housing policies, procurement procedures contractual and labor compliance and site visits as required. The Department submits Monthly Performance Reports and Annual Performance Report stating outcome of activity. Non-attainment of the performance goals stated, as determined by the NDD Administrator, will result in the funds being reprogrammed after the close of the Program Year.

Community Housing Development Organizations (CHDO's)

CHDO's are typically monitored annually during the program year depending on the progress of their program and technical assistance needed. The NDD representatives verify eligibility, financial management, environmental reviews, project performance, requirements for accessibility, fair housing compliance, lead based paint and labor standards. During the period of affordability for HOME assisted rental housing, on-site inspections must be performed to determine compliance with the property standards of Sec. 92.251 and to verify the information submitted by the owners. The inspections may be conducted no less than: every three (3) years for projects containing 1 to 4 units; every two (2) years for projects containing 5 to 25 units; and

Expected Resources

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

Introduction

The Fiscal Year 2022-2026 Consolidated Plan is the City of Hamilton’s strategic planning document that addresses housing assistance, economic development, public services and other community development needs. This also includes the Annual Action Plan Update for Fiscal Year 2022-2026. The City of Hamilton will use Community Development Block Grants (CDBG) and HOME entitlement funds to help meet the needs of low and moderate income citizens as well as eliminate slum and blight.

Anticipated Resources

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

CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,350,621	29,995	429,646	1,810,263	5,522,465	FY 2022-2023 allocation of funds from HUD announced 5/13/2022 in the amount of \$1,350,621. Program income includes \$29995.15 as Misc PI (\$6500), CRLF (\$8000), and HRLF (\$15495.15)
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	399,573	17,000	0	416,573	1,866,080	FY 2022-2023 allocation of funds from HUD announced 5/13/2022 in the amount of \$399,573 EN. Available for programming is \$17,000 (Total available) (as of 1/31/2022)
General Fund	public - local	Other	49,947	0	0	49,947	199,788	12.5% HOME Match funds from the city's General Funds.

Table 59 - Expected Resources – Priority Table

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

The Department of Community Development continues to broaden and strengthen relationships with appropriate agencies and other City of

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

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

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

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

This section is *Not Applicable* to the City of Hamilton.

Discussion

The Finance Department continues to take a more strategic approach on funding to opportunities to meet the greatest needs such as housing, economic development, vacant/dilapidated housing demolition, street resurfacing and repair, and homeless support services. In addition, the Department is taking a more focused approach on implementing portions of the City's Strategic Plan to foster renewed investment and economic development/job creation in the community which include Economic Development Revolving Loan Fund, Design Assistance for new and/or expanding businesses.

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

Table 60 – Goals Summary

Goal Descriptions



Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Hamilton made available to the public Summer 2021 an application for Fiscal year 2022-2023 Community Development Block Grant (CDBG) Program and for Fiscal Year 2022-2023 Home Investment Partnership (HOME) Grant Program. The city also held a mandatory Technical Assistance Session in order to review components/guidelines of the applications. The deadline to submit grant applications to the City was Thursday, September 23, 2021. The projects recommended for funding for the Fiscal year 2022-2023 Community Development Block Grant (CDBG) Program and for Fiscal Year 2022-2023 Home Investment Partnership (HOME) Grant Program are included in the budgets.

Substantial Amendment -

In the winter of 2022-23, the City amended funds for Public Facilities and Housing activities including: Hamilton Living Water - HVAC Improvements, City of Hamilton Fire Department - Site Acquisition, Housing Contractual, and NESH Emergency Home Repair Program. The City held a public comment period from December 5, 2022 to January 3, 2023. Additionally, the city held a public hearing on January 11, 2023 at 6pm. No comments were received during either.

Projects

#	Project Name
1	Housing
2	Economic Development
3	Public Services
4	CDBG Administration - 20% CAP
5	HOME Administrative Costs - 10% CAP
6	Clearance & Demolition
7	CHDO Operating Costs - 5% CAP
8	Public Facilities
9	Fair Housing

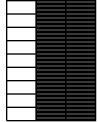
Table 61 – Project Information

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

The City of Hamilton Neighborhood Development Division received many applications for CDBG/HOME

funding. Ultimately after reviewing the applications five (5) were not recommended for funding. The City also held two public hearings one on March 3, 2022 at 1:30 pm in City Council Chambers during the City's Planning Commission Meeting, and one on March 9, 2022 at 6:00pm during the City Council Meeting in City Council Chambers. During both public hearings, a presentation was made which included the proposed draft budget allocation. Comments were received at the public hearing during the City Council meeting. At this time, comments were made concerning the use of funds and funds in support of the local homeless shelter, Serve City. The comments were addressed by the City Manager and Finance Director.

AP-38 Project Summary
Project Summary Information



AP-50 Geographic Distribution – 91.220(f)

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

Per the City of Hamilton's Analysis of Impediments to Fair Housing (AI) analysis and input gathered during the public meetings the City does not have any areas of R/ECAP nor is there a need to direct assistance to specific areas of the jurisdiction. As a result, the City makes every attempt to view all areas of the City as equally deserving of allocations for investments.

Geographic Distribution

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

Table 62 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Investments are allocated to projects throughout the entire jurisdiction to provide communities and residents with the services and support needed.

Discussion

The city will continue its efforts to make sure that projects, funds, and services are equally distributed throughout the jurisdiction.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The below projects are anticipated to address the need for affordable housing in the jurisdiction:

S.E.L.F - Neighbors Who Care, Home Repair Program - \$20,000 (CDBG)

Neighborhood Housing Services - Emergency Home Repair - \$100,000 (CDBG)

Neighborhood Housing Services - New Construction, Homeownership - \$185,000 (HOME)

Neighborhood Housing Services - Down-payment & Closing Cost Assistance - \$143,876.50 (HOME)

One Year Goals for the Number of Households to be Supported	
Homeless	40
Non-Homeless	0
Special-Needs	0
Total	40

Table 64 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	1
Rehab of Existing Units	8
Acquisition of Existing Units	4
Total	13

Table 65 - One Year Goals for Affordable Housing by Support Type

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

The City of Hamilton's Public Housing is provided and managed by the Butler Metropolitan Housing Authority (BMHA). This authority has the ability to operate throughout Butler County.

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

Currently, fifty percent (50%) of all BMHA public Housing Units are in the City of Hamilton. BMHA maintains approximately 1,156 housing units and provides an average of 280 occupied Section 8 Vouchers data from the city's Analysis of Impediments.

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

The city feels strongly that supportive services are needed for residents of public housing. The City will be funding Service providers for new construction (Neighborhood Housing Services), and Down Payment and Closing Cost Assistance (Neighborhood Housing Services).

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

The local PHA (BMHA) is not designated as troubled.

Discussion

The city anticipates continuing its relationship with BMHA to promote and provide affordable rental housing to extremely-low and low-income residents of the jurisdiction.

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

Introduction

The City of Hamilton is an active participant in the Butler County Housing & Homeless Coalition (BCHHC). BCHHC applies and receives funding through the Balance of State - Continuum of Care (CoC). In addition, the city along with Butler County and the City of Middletown anticipate continuing support to BCHHC.

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 jurisdiction will continue to support the objectives of BCHHC under its Strategic Plan and Annual Action Plan for the CoC. The objectives of the BCHHC are as follows:

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency shelter assistance is provided via the local homeless shelters and local churches. Additionally, Transitional Living, Inc and BMHA work to address homelessness.

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

The city has and will continue to support programs that assist families with the transition to permanent and independent living. The city anticipates continuing partnerships with Neighborhood Housing Services (NHS) to provide first time homebuyer assistance (financial support and counseling) and also low-income rental housing (including families, families with children, and veterans).

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

Several community organizations assist with preventing homelessness in the community. More specifically, S.E.L.F provides rental and utility assistance. The United Way, Salvation Army, and St. Vincent DePaul also provide rent and utility assistance. While the YMCA and YWCA provide health, employment, youth/senior services, and/or housing services. Lastly, NESH provides foreclosure prevention options.

Discussion

The city welcomes feedback and partnerships that aid in addressing homelessness in the community.

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

Introduction:

Two factors that affect the affordability of housing in a community are local property taxes and utility costs. According to the book, **Rates of Taxation in Butler County, Ohio Tax Year 2021**, the taxes in the City of Hamilton are relatively low. For example, Hamilton's taxes were 58.07 mills as compared to 54.38 mills for Fairfield City; 66.99 for Middletown, 95.03 for Liberty, and 43.37 mills in the City of Oxford.

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

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

The city utilizes a "one-stop" permitting process to expedite permitting and review procedures while also avoiding costly delays. The city's zoning code is not unduly restrictive. More specifically, the city's minimum lot size for the least dense residential zoning district (10,000 sq ft) is well below the region's (Cincinnati-10,000 sq ft min, Middletown-20,000 sq ft min, Fairfield-12,000 sq ft min). The city continues to encourage the development of mixed-use affordable housing that may include residential housing at higher densities in certain areas, including CORE Area and affordable new single family construction in neighborhoods. The city's subdivision regulations require the installation of sidewalks, curbs/gutters, and storm water retention methods, which may increase housing costs. However, the city's regulations are not unduly harsh nor are they more restrictive than those in the region. In regards to infrastructure requirements for subdivisions, they are also at the minimum standard to ensure public health, welfare and safety. Additionally, sidewalks, curb, and gutters promote walkability within and between neighborhoods for households with limited transportation options/funds. In an attempt to ease the construction costs for developers, the city's zoning code allows for Planned Unit Developments (PUD's), form-based mixed-use zoning, clustered housing, zero lot line zoning, and certain density bonuses. All being said, the city's policies and regulations do not significantly impact housing choice or affordability. As such, the city has not outlined a strategy for modification or amendment. The city will continue to regularly review policies/regulations to propose changes as deemed necessary.

Discussion:

The city anticipates routinely conducting assessments to identify barriers to affordable housing.

AP-85 Other Actions – 91.220(k)

Introduction:

The city has developed multiple methods for meeting underserved needs, evaluating lead-based hazards, reducing the number of maintaining affordable housing, poverty-level families, developing institutional structure, enhancing coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

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

Actions planned to foster and maintain affordable housing

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

The City, to ensure affordability for HOME funded projects, uses the Recapture method consistent with 92.254(5). Specifically:

- The PJ uses the pro rata reduction model of recapture amount during affordability period for all HOME programs.
- Recapture amount is the direct subsidy received by homebuyers in the PJ's homebuyer assistance program.
- The amount of recapture is limited to net proceeds from the sale of price minus superior loan repayment) other than HOME funds) and closing costs.

Actions planned to reduce lead-based paint hazards

In an effort to reduce hazards in Hamilton, the City continues to utilize Lead Safe Work Practices. These efforts lead to the creation of a residential façade program. This program allows work to bring the exterior of income eligible owner occupied housing structures to standard condition.

Actions planned to reduce the number of poverty-level families

The city feels that poverty reduction is an ongoing process. Nonetheless, the city attempts to quantify program and project outcomes to measure against assumed baseline figures. For example, the city

reasonably assumes that approximately ### housing units have lead based paint issues (using HUD's formula for calculation). The city recognizes that lead abatement is proposed to be completed on four (4) units. Therefore, it may assumed that ### units may have lead paint issues in the upcoming grant cycle. Depending on projects and programs, baseline measures have and will continue to be developed. Additionally, the city uses statistical information for calculating the reduction of poverty. The three (3) most used sources to determine the extent of poverty reduction by the city is unemployment rate, census income information and local income tax information.

Actions planned to develop institutional structure

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

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

Public Institution

The City of Hamilton's Community Development Department, Neighborhood Development Division will administer both the CDBG and HOME programs. Funds will be used for a variety of activities which include, but may not be limited to, owner rehabilitation, rental rehabilitation, home buyer assistance, capital improvements, economic development and technical assistance to nonprofits and public services operated by nonprofits. The City may assist other public or nonprofit groups in providing other types of affordable housing assistance. The City may apply for State Low Income Housing Tax Credits (LIHTC) or other forms of State assistance as specific projects develop.

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

Private Industry

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

Discussion:

The city anticipates routinely meeting underserved needs, evaluating lead-based hazards, reducing the number of maintaining affordable housing, poverty-level families, developing institutional structure, enhancing coordination between public and private housing and social service agencies.

Program Specific Requirements

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

Introduction:

The city has well defined and specific requirements for complying with 91.220(I)(1,2,4).

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	0.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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

Consolidated Plan	HAMILTON	122
-------------------	----------	-----

as follows:

The city does not have other forms of investment being used beyond those identified in Section 92.205.

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

The participating city uses the “recapture” method under the HOME program as required by 92.254. Specifically:

- The PJ uses the pro rata reduction model of recapture amount during affordability period for its HOME rental, down-payment/closing cost assistance, and acquisition/rehab programs.
- Recapture amount is the direct subsidy received by homebuyers in the PJ’s homebuyer assistance program.
- The amount of recapture is limited to net proceeds from the sale or transfer of title whether voluntary or involuntary. Net proceeds are defined as sale price minus superior loan repayment (other than HOME funds) and closing costs.
- The PJ uses the resale model for new construction for homeownership when there is only development subsidy such as when Habitat for Humanity develops new construction for homeownership.

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

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

- The PJ uses the pro rata reduction model of recapture amount during affordability period for its HOME rental, down-payment/closing cost assistance, and acquisition/rehab programs.
- Recapture amount is the direct subsidy received by homebuyers in the PJ’s homebuyer assistance program.
- The amount of recapture is limited to net proceeds from the sale or transfer of title whether voluntary or involuntary. Net proceeds are defined as sale price minus superior loan repayment (other than HOME funds) and closing costs.
- The PJ uses the resale model for new construction for homeownership when there is only development subsidy such as when Habitat for Humanity develops new construction for homeownership.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is

rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The city does not have current plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

Appendix - Alternate/Local Data Sources

