

**Prepared for Butler County
& Butler County HOME Consortium
Butler County and City of Middletown, Ohio**



October 2022

Prepared for Butler County by



Butler County/City of Middletown Consortium HOME-ARP Allocation Plan

Instructions: All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Describe the consultation process including methods used and dates of consultation:

On May 9, 2022 a Brochure announcing an initial public/stakeholder meeting, with detailed information regarding the amount of HOME-ARP funding Butler County and Middletown HOME Consortium had received, a summary of the purpose of the funding to reduce homelessness and increase housing stability, and asking for their attendance was posted on the Butler County Department of Development website.

On May 13, 2022 an email invitation to the Public meeting was sent to 81 Stakeholders that included the brochure and a description of what would be covered during the meeting. We emphasized the importance of their feedback and the value that they could bring in sharing what

they see as needs within the community, and activities that they feel would be helpful in meeting those needs. They were asked to verbally invite others, including members of the public, and to post the brochure, and send the meeting information electronically to others. A reminder was sent one day prior to the meeting.

On May 24, 2022 a Virtual Public Meeting was held, as scheduled. The agenda included a presentation that included a look at the data that, demonstrating potential needs for the funding, and a review of eligible activities that may be funded with HOME-ARP funds. Chat was provided for their comments and questions. The 21 attendees also participated in polling as a way of providing additional feedback to areas of need, what they thought the best uses would be, and areas that were not as important to fund. Questions were all based on eligible uses of funds. Questions, discussion, and comments continued through the end of the Public Meeting. A copy of the presentation was provided to all of those who were initially invited, and to anyone who made a request for this information.

During the weeks of June 6 and 13, 2022 individual interviews were completed with 14 key Stakeholders. These individuals represented organizations with one or more of the qualifying populations. All qualifying populations were covered within this group. Interviewees were provided ahead of time with all the eligible uses of funds. As a part of the interviews, they were asked to describe their organization and goals. How the funding could help them achieve their goals. They were then asked to think outside of their organization and to discuss needs within the community relative to the HOME-ARP funding, and about the best use of the funding in their communities.

This information was very valuable in identifying needs. This information was compiled in a document listing each organization and their confirmed areas of coverage and services. The information was then reviewed, and three key areas of focus were identified and discussed as a part of recommendations.

On August 18, 2022 four additional interviews were conducted with organizations that could potentially develop housing and/or provide Supportive Services to better flesh out the types of housing that is needed, constraints that could drive preferences relative to the qualifying populations, and other activity delivery and funding details.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Neighborhood Housing Services	Homeless and domestic violence service provider through the provision of affordable housing creation. Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.	Interview, Public Meeting, SIMS Housing Workgroup, 2 nd Interview with potential housing providers	<ul style="list-style-type: none"> • Affordable Housing is not the issue, but lack of quality affordable housing. There are too many rentals that are substandard. • Need for transitional housing for households with children. • Don't spread funding too thin, don't band-aid things, do something that will continue to benefit people of modest means for decades and make a significant impact. • Gap in funding for foreclosure counseling. Need has greatly increased. This is one of the hardest things to fund. The new certification requirements make it difficult to fund enough counselors. • Gap in funding for acquisition/rehab rentals. • See a lot of seniors who are forced to choose medicine over rent and may remain homeless. There are not a lot of housing options for them.
Butler Metro Housing Authority	Public Housing Agency (PHS's), Public agencies that address the needs of all four of the qualifying populations.	Interview, SIMS Housing Workgroup, 2 nd Interview with potential housing providers	<ul style="list-style-type: none"> • HUD has underfunded housing capital projects, and the County is struggling with insufficient funding in this area. • Current/barriers - concerned about a gap in the financing to close projects based upon climbing interest rates. Inflation in general is taking a

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
			<p>toll. Challenges with housing standards.</p> <ul style="list-style-type: none"> Funding should be spent on the supportive services side of the equation.
Community First Solutions	Homeless service providers, domestic violence service providers, public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.	Interview, SIMS Housing Workgroup, 2 nd interview with potential housing providers	<ul style="list-style-type: none"> Lack of affordable housing. Increase the number of units or properties that are available. Challenges/barriers - To pay for people who need case management and other services, but don't meet the requirements to allow those providing the services to get paid. Supportive services – Case manager is the connector to other services. They can be the hub of the wheel to reduce barriers. Covid has exacerbated the mental health needs, but there is not an increase in the licensed workforce. The cost of providing services and the cost of care is increasing, and difficult to cover. You need to think about what people need, in terms of services, jobs, transportation (including costs). Will get push back from NIMBY, but the housing needs to be around the urban areas where these things exist. Geography of where housing should be.
COHHIO	State Co-Applicant for the Balance of State CoC serving the jurisdiction's geographic area	Interview	<ul style="list-style-type: none"> There is a significant need for investment in affordable housing for the qualifying populations.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
			<ul style="list-style-type: none"> Addressing the needs of the homeless should be a priority. Data provided relative to needs and capacity.
New Life Mission	Homeless service provider, working through the local Continuum of Care.	Interview	<ul style="list-style-type: none"> There is a real need for wrap around services. Affordable housing is an issue. Funding for rehabilitation to create housing opportunities. The housing funding needs to be targeted to Hamilton and Middletown, but also across the County.
Women Helping Women	Domestic violence service provider.	Interview	<ul style="list-style-type: none"> Significant issues with affordable long-term housing. Issues are they want to move to a safe area. Significant dollars are required up-front, which is a significant hurdle. Availability, affordability, and safety, in that order. Staff time can be difficult to fund, but staffing is necessary to success. Victim's services can be difficult to fund. Housing and services are the most pressing needs. <p>Would like to expand Domestic Violence Enhanced Response Team (DVERT) into Butler County.</p>
Family Promise	Homeless service provider and CoC serving the jurisdiction's geographic area (Linda Smith, of Family Promise, is the Region 14 COC Board Member and	Interview, SIMS Housing Workgroup	<ul style="list-style-type: none"> A need for more prevention dollars to show that we are keeping people housed. Need permanent housing and affordable and supportive services as a part of their housing. Two things I would love to see are a drop-in center to keep

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	Representative on the Steering Committee for the BoSCoC.)		<p>people off the Street and a place where the police can take people.</p> <ul style="list-style-type: none"> • Gaps in funding for: 1) Housing that provides services, case management, etc., without being specifically permanent supportive housing. 2) Transition aged youth – where do we go for shelter for them, especially if they are under 18 – this is a growing group.
Hope House Mission	Homeless service (and housing) provider, working through the local Continuum of Care, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.	Interview, Public Meeting	<ul style="list-style-type: none"> • Women could use the same type of facility the men have. Supportive housing structure. Not just transitional living, but to transition from shelter to permanent supportive housing. Would like to build a brand-new shelter, renovate or expand. • Ongoing services (critical to success of those leaving shelters)- need mental health services, near grocery stores, access to transportation. Access to childcare, walk ability and connectivity with community, bank, and doctors. All those things in close proximity on a bus line and walkable nearby. What seems like a small barrier can trigger anxiety and depression. • Addressing the combination of the mental health and addiction piece while they are in the shelter. Need something in place for this. Need

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
			<p>counseling. Need ability to deal with the issues, not just the symptoms.</p> <ul style="list-style-type: none"> • Not enough affordable housing because landlords don't want to rent to those with felonies, evictions, etc. Landlord education. Community awareness. Need more bedrooms in homes. Safe housing. Housing to renovate. • Permanent Supportive Housing is needed - Housing that clients are able to afford on their own is nearly uninhabitable. Drug and crime infested, which is especially problematic for those struggling to maintain sobriety. • Transportation for the shelter for us to get them places. Childcare for the Shelter. Extend length of stay. • Build housing to address the most critical needs. The ones who absolutely need housing the most. The ones that are the hardest to find housing for. More housing for those with mental health issues.
Community Development Professionals	Homeless service provider.	Interview, SIMS Housing Workgroup	<ul style="list-style-type: none"> • Housing needs to be throughout the County. However, people need to be close to services and available jobs. • Need a variety of housing solutions in diverse geographies.
City of Middletown	Public agency that addresses the needs	Interview, SIMS Housing	<ul style="list-style-type: none"> • More money for additional units

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
	of all four of the qualifying populations.	Workgroup, Public Meeting	<ul style="list-style-type: none"> • Housing for everyone is the goal. Creating opportunities and a variety of housing options. Be creative and multi-pronged. Need money in housing inventory. • Need Affordable housing in general. People coming out of shelter with nowhere to go. Not enough units for those with vouchers.
Butler County Housing and Homeless Coalition	Homeless service provider, and local group feeding information to, and managing locally the meeting of various needs through the various agencies involved in the continuum for the Balance of State Continuum of Care.	Interview, SIMS Housing Workgroup	<ul style="list-style-type: none"> • Gap in emergency housing/emergency shelter. People with mental health. Need a drop in option. • Lack of available units – Need supportive housing both inside and outside of HUD’s definition. People coming out of recovery and people with mental health issues. • Need Affordable housing in general. People coming out of shelter with nowhere to go. Not enough units for those with vouchers.
Sojourner Recovery Services	Service provider for all of the qualifying populations.	Interview, Public Meeting, SIMS Housing Workgroup	<ul style="list-style-type: none"> • Mental Health and Addiction therapy needed. Access to crisis stabilization services. A facility available to stabilize person. • Permanent supportive, clean environment housing. Once someone has received mental and health services. Need a safe sober housing to keep them from relapsing. A significant gap in continuum. • Expand homeless shelter sources. A lot of homeless

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
			<p>in the community. Need more services to get people out of tents behind shopping centers. Could go into the shelters and partner presenting his services once they are out of tents.</p> <ul style="list-style-type: none"> • Funding Gap in front door for homeless shelters. Gap in back door for ongoing care. • Need money for top level people – no funder wants to pay overhead. Money for people. Allocation or percentage of funding for that. Without that you don't have a service. • Funding should be used frontline and supportive housing, crisis stabilization.
Housing Opportunities Made Equal (HOME)	Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.	Interview	<ul style="list-style-type: none"> • They do not have enough financial resources for rent and utility assistance. • Tenants and homeowners need money to make housing accessible there is a need for home funding across the region – home maintenance and disrepair issues. • Would be good if funding could provide staffing, fair housing testing (need to be able to do more testing), complaint investigation, outreach and training,

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
			printing materials and distribution.
Butler County Veterans Services Commission	Veterans' group, and public agency that addresses the needs of all veterans across the four qualifying populations.	Interview	<ul style="list-style-type: none"> • Mental Health services and housing. Shelters are completely full. Not enough resources for mental health treatment and affordable housing. • Homelessness is a problem. Nothing on the market to rent or to move into. • Funding should go to nonprofit operating expenses, food banks, shelters. We don't have a central mental health facility. • In our organization funding to address housing assistance in our financial aid program. Emergency funds for placement of Homeless when shelters are not available. Pooled account to cover these situations.
Serve City	Homeless service (and housing) provider, working through the local Continuum of Care.	Interview, Public Meeting	<ul style="list-style-type: none"> • Often to use money we have to expand our scope, which often we are not prepared to do. I can easily find money for staffing homeless shelters. They can't find money for leadership salaries, utilities, and maintenance in their apartment buildings (they have not been seen as a part of the shelter funding).

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
			<ul style="list-style-type: none"> Invest in permanent supportive housing. Available rental units, that offer some supportive services are critical to the success of their people. When my kid gets sick, who can take care of them. Supportive Services – houses in healthy safe environment, on-site case management office designed to help and support, direct to other resources for the residents who live there.
YWCA Hamilton	Homeless service (and housing) providers and domestic violence service (and housing) providers working through the local Continuum of Care. Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.	Interview, SIMS Housing Workgroup	<ul style="list-style-type: none"> Future must continue to develop more permanent supportive housing units in region 14, for vulnerable populations. A level of care in the affordable housing world that provide for those that are the most difficult to house and keep housed. Disabilities, escaping domestic violence that need a fresh start, veterans, minority communities. We need safe housing. A place that is safe. We need low barrier emissions, housing stocks and subsidies. We don't have is a PHS for families. Low-income affordable housing safe for families that can't afford them. Building permanent supportive housing is only half, second is funding the services – social services staff, case workers,

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
			addiction treatment providers, primary care. Funding for agencies like COHHIO, staff funding support. Transportation funding and childcare.
Supports to Encourage Low-Income Families (SELF)	Homeless service providers working through the local Continuum of Care. Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.	Interview, Public Meeting, SIMS Housing Workgroup	<ul style="list-style-type: none"> • Need for more transitional housing with support services. • Utilize some of Counties HOME funds to help in development of single-family housing. • Need more non congregant shelters. • Will need more tenant rent help down the road after funds that are currently there are dried up. • Have challenges of affordable housing. Cost of housing has gone up dramatically.
Partnerships for Housing	Homeless service providers working through the local Continuum of Care.	Public Meeting	<ul style="list-style-type: none"> • There is not much (almost nothing) that is available on the market for people of modest income.

Summarize feedback received and results of upfront consultation with these entities:

The feedback received through meetings, and individual interviews covered a broad scope, but there was consistency of need expressed in these three areas: 1) The need for more quality affordable housing: People are coming out of shelters with nowhere to go and not enough units for those with vouchers. Often rental units are substandard, landlords don't want to rent to them, and the cost of rent is increasing. 2) More specifically, Permanent Supportive Housing (PSH) tied to the provision of appropriate supportive services. People need a safe place to go, that provides resources for a variety of identified needs to create a better chance of success in life for families and individuals. This will provide for better outcomes and reduce the number of people cycling through the system. 3) Expansion of services, case management, and resources specifically for the homeless and for those falling through the cracks in the system. We also need more space in the shelters. Too many are still in tents. Too many are homeless due to lack of

affordable housing, addictions, or mental health problems. Homeless shelters need expanded services and extended length of stay.

Data was reviewed that supported these focus areas of need. Additional interviews with service providers were scheduled to discuss partnering of resources to cover more of the needs in these areas with the HOME ARP funding, and to better flesh out specific needs among qualifying populations. Discussions led to a focus on two activities. Housing tied to services, and stand-alone services targeted to meet specific needs identified in consultation and supported by available data.

We also came away with a much better idea of how to address preferences in order to best meet what initially appeared to be competing interests, but what ended up being a path forward to address needs of all qualifying populations.


We also participated in the SIMS working group, which is a local group that is focused on identifying and meeting the housing needs of those with a mental health diagnosis, and formerly incarcerated individuals. We benefited from attendance at the meetings, and obtained much useful data from their work, which we have included in our analysis.

A brochure from the Stepping Up initiative:

THE

STEPPINGUP

INITIATIVE



THE OHIO
PROJECT

HOUSING SOLUTIONS

BREAKING THE CYCLE OF
JAIL AND HOMELESSNESS

THE LINK
BETWEEN HOUSING &
MENTAL HEALTH

Research shows that when people with mental illnesses have access to robust mental health services and appropriate and affordable housing, two things happen:

- 1 the individual achieves better health outcomes and
- 2 the cost to public systems drops.

LEARN MORE ABOUT
HOUSING SOLUTIONS
THAT CAN HELP BREAK
THE CYCLE OF JAIL AND
HOMELESSNESS:

Sally Luken

sally.luken@lukensolutions.com

614-946-0313

MAKING THE BUSINESS CASE FOR
INCREASING HOUSING OPTIONS

Stepping Up Ohio Counties have identified the lack of housing as one of the top three challenges in reducing the number of people with behavioral health issues cycling in and out of jails. To address the challenge, Stepping Up Ohio offers tools to help develop housing units to meet local needs.

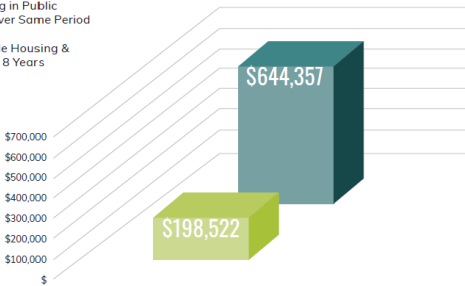
Beginning with the identification of individuals who are among a county's most frequent faces, and calculating the cost of the corresponding in/out jail cycling, community leaders can then:

- Understand the financial implications of maintaining the status quo.
- Raise awareness, garner support, and capture political will to prioritize tasks that can lead to increased housing interventions.
- Expand collaboration and cooperation among the multiple systems capable of investing in housing.
- Learn how to access available resources to increase appropriate housing types.

PUBLIC COST COMPARISON

■ Cost to Cycling in Public Institutions Over Same Period

■ Cost to Provide Housing & Services Over 8 Years



Category	Cost
Cost to Cycling in Public Institutions Over Same Period	\$644,357
Cost to Provide Housing & Services Over 8 Years	\$198,522

▶ One man, in Delaware Co., Ohio, cost the public systems more than \$445,000 over 8 years, while his health and well-being suffered.

READY TO INCREASE HOUSING OPTIONS
FOR THOSE WITH MENTAL ILLNESSES?

Learn more at www.lukensolutions.com

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Updated 11/2021

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

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- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Template:

Order Confirmation							
<u>Ad Order Number</u> 0000765047	<u>Customer</u> Butler Co Dept Of Development	<u>Payor Customer</u> Butler Co Dept Of Development	<u>PO Number</u> 2021 Action Plan Substantial Amendment for HOW				
<u>Sales Rep.</u> amy.kirby	<u>Customer Account</u> 13584	<u>Payor Account</u> 13584	<u>Ordered By</u> Susan Ellerhorst				
<u>Order Taker</u> justin.peterson	<u>Customer Address</u> 130 High St Hamilton OH 45011 USA	<u>Payor Address</u> 130 High St Hamilton OH 45011 USA	<u>Customer Fax</u>				
<u>Order Source</u> Non Web	<u>Customer Phone</u> 5137855391	<u>Payor Phone</u> 5137855391	<u>Customer EMail</u>				
			<u>Special Pricing</u>				

<u>Invoice Text</u>	<u>Ad Order Notes</u>
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<u>Net Amount</u>	<u>Tax Amount</u>	<u>Total Amount</u>	<u>Payment Amount</u>	<u>Amount Due</u>
\$348.84	\$0.00	\$348.84	\$0.00	\$348.84

<u>Ad Number</u> 0000765047-01	<u>Ad Type</u> Legal	<u>Production Method</u> AdBooker	<u>Production Notes</u>
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<u>External Ad Number</u>	<u>Ad Attributes</u>	<u>Ad Released</u> No	<u>Pick Up</u>
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<u>Ad Size</u> 1 X 102 li	<u>Color</u>
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<u>Run Date</u>	<u>Product</u>	<u>Placement</u>	<u>Sched Cst</u>	<u>Disc/Prem</u>	<u>Color</u>	<u>Pickup</u>	<u>Tax</u>	<u>Subtotal</u>
10/02/2022	O-Journal-News	Legals	\$348.84	\$0.00	\$0.00	\$0.00	\$0.00	\$348.84
10/02/2022 - 10/31/2022	O-Web	Legals	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

<u>Ad Content</u>

**NOTICE OF PUBLIC HEARING
2021 Action Plan Substantial Amend-
ment for HOME-ARP Allocation Plan**

Butler County will be submitting a Substantial Amendment for 2021 Annual Action Plan to the U.S. Department of Housing and Urban Development (HUD). The Amendment consists of changes to the Home Investment Partnership Program (HOME) Grant to include the HOME-ARP Allocation Plan.

A public hearing for informational purposes and public comments relative to the HOME-ARP Allocation Plan for Butler County will be held on October 17, 2022 at 9:30 a.m., located in the Commissioners' Hearing Room on the second floor of the Butler County Government Services Center, 315 High Street, Hamilton, Ohio and online at <http://butlercountyoh.igm2.com/Citizens/default.aspx>.

The Butler County / City of Middletown Consortium was awarded \$3,105,309 in HOME - American Rescue Plan (HOME-ARP) funds in a one-time allocation from the U.S. Department of Housing and Urban Development (HUD) to benefit the residents of both Butler County and the City of Middletown.

The Butler County Allocation Plan for the HOME-ARP and substantial amendment will be available for public review and comment from October 2 through October 17, 2022 on the website <http://development.butlercountyohio.org/content/txtcontent/cd/cdhome.cfm>

and at Butler County Community Development, 130 High Street 6th Floor, Hamilton, Ohio, 45011. Written comments relative to the Allocation Plan can be mailed to the above address or emailed to susan.ellerhorst@bcOhio.us.

HUD is requiring an Allocation Plan from Butler County to receive the federal HOME-ARP funds. The HOME-ARP Allocation Plan is a strategic plan detailing the allocation of funding to assist individuals or households who are experiencing homelessness, at risk of homelessness, victims of domestic violence, and other vulnerable populations, by providing affordable housing, rental assistance, supportive services, and/or non-congregate shelter, to reduce homelessness and increase housing stability for qualifying populations. The Allocation Plan defines the use of federal HOME-ARP grant funds to address these needs.

Copies of this Public Notice will be distributed to approximately one dozen partner entities serving a significant population of persons who are in legally protected classes, may have barriers to public participation, are vulnerable, and/or may be eligible for assistance through these funds. This includes persons in a racial/ethnic minority, persons with disabilities, female heads-of-households, abused spouses, persons with HIV/AIDS, persons experiencing/at risk of homelessness, etc.

Butler County will provide assistance to non-English-speaking persons, persons with limited English proficiency, and/or persons with disabilities, needing interpreters or other auxiliary aids and services in order to participate in this hearing. Any request for such assistance must be made no later than 48 hours in advance of the hearing, by contacting the Community Development Division at (513) 785-5391.

By order of the Butler County
Board of Commissioners.

Susan Ellerhorst
Community Development
Administrator
10/2/2022

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Date(s) of public notice: 10/2/2022***
- ***Public comment period: start date - 10/2/2022 end date - 10/17/2022***
- ***Date(s) of public hearing: 10/17/2022***

Describe the public participation process:

The public participation process was started in May 2022 by including an additional public meeting at the beginning, beyond what was required. Our objective was to create as much public, organizational awareness, and opportunities for feedback as possible to increase the possibility of determining the best recommendations for use of funds. A virtual public meeting was scheduled, brochures were distributed physically and electronically and were posted on the Butler County website on May 9. Emails were sent to 81 Stakeholders that included Community Development Professionals, Township Trustees and Administrators, Commissioners, Villages and Cities. Detailed information in regard eligible activities that may be funded with HOME-ARP funds were included. Each of these stakeholders was encouraged to post the brochure and to distribute this information to the public.

May 24 - A Virtual Public Meeting was scheduled and held on May 24. The agenda included a presentation that included a look at the data that showed possible needs for the funding, reviewed eligible activities that may be funded with HOME-ARP funds. Chat was provided for their comments and questions. The 21 attendees participated in polling as a way of providing additional feedback to areas of need, what they thought the best uses would be, and areas that were not as important to fund. Questions were all based on eligible uses of funds. Questions, discussion, and comments continued through the end of the Public Meeting. A copy of the presentation was provided to all of those who were initially invited and per request. Unfortunately, no members from the general public attended this public meeting, despite our efforts.

October 2 - 17 – Beginning of 15-day public comment period. A draft of the plan was posted on Butler County website, along with a request for public comment. Stakeholders were informed and encouraged to share. A public notice of Public Hearing is posted and published by local newspaper. The Notice of Public Hearing included information about the funds, uses for funds, link to view draft of HOME-ARP Allocation Plan, contact information for questions and comments. Copies of this Public Notice was distributed to approximately one dozen partner entities serving a significant population of persons who are in legally protected classes, may have barriers to public participation, are vulnerable, and/or may be eligible for assistance through these funds. This includes persons in a racial/ethnic minority, persons with disabilities, female heads-of-households, abused spouses, persons with HIV/AIDS, persons experiencing/at risk of homelessness, etc.

Butler County offered assistance to non-English-speaking persons, persons with limited English proficiency, and/or persons with disabilities, needing interpreters or other auxiliary aids and services in order to participate in this hearing. Any request for such assistance were to be made no later than 48 hours in advance of the hearing, by contacting the Community Development Division at (513) 785-5391.

Describe efforts to broaden public participation:

May 9, 2022 - A Brochure announcing an initial public meeting beyond that required, with detailed information regarding the amount of HOME-ARP funding Butler County and Middletown HOME Consortium had received, a summary of the purpose of the funding to reduce homelessness and increase housing stability and asking for their attendance was posted on the Butler County Department of Development website and would be included in email sent on May 13, to 81 Stakeholders. Each of these stakeholders was encouraged to post the brochure and to distribute this information to the public.

May 13, 2022 - An email invitation to the Public meeting was sent to 81 Stakeholders with the brochure and description of what would be covered during the meeting. We emphasized the importance of their feedback and value they provide in sharing what they are seeing as needs and activities they feel would be helpful in meeting those needs. They were asked to verbally invite others, post brochure, and send the meeting information electronically to others. Reminder was sent one day prior to the meeting.

May 24, 2022 - A Virtual Public Meeting was scheduled and held. The agenda included a presentation that included a look at the data that showed possible needs for the funding, reviewed eligible activities that may be funded with HOME-ARP funds. Chat was provided for their comments and questions. The 21 attendees participated in polling as a way of providing additional feedback to areas of need, what they thought the best uses would be, and areas that were not as important to fund. Questions were all based on eligible uses of funds. Questions, discussion, and comments continued through the end of the Public Meeting. A copy of the presentation was provided to all of those who were initially invited and per request. Unfortunately, no members of the general public attended this meeting.

October 2, 2022 – Draft of plan reviewed and made available to the public, Public Hearing and Comment Period completed as of the Public Meeting on October 17. A draft of the plan was posted on Butler County website, along with a request for public comment. Stakeholders were informed and encouraged to share. A public notice of Public Hearing was posted and published by local newspaper. The Notice of Public Hearing included information about the funds, uses for funds, link to view draft of HOME-ARP Allocation Plan, contact information for questions and comments. Copies of this Public Notice was distributed to approximately one dozen partner entities serving a significant population of persons who are in legally protected classes.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

- There were no written comments or recommendations by the public during the 15-day public comment period
- There were no verbal or written comments or recommendations made by the public at the Public Hearing.

Summarize any comments or recommendations not accepted and state the reasons why:

Not applicable, there were no comments or recommendations not accepted.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Table 2: Homeless Needs Inventory and Gap Analysis Table

Homeless											
	Current Inventory			Homeless Population				Gap Analysis			
	Family		Adult	Family HH (at least 1 child)	Adult HH (c/o child)	Vets	Victims of DV	Family		Adults Only	
	# of beds	# of units	# of beds					# of beds	# of units	# of beds	# of units
Emergency Shelter ¹	51	17	183 ²								
Transitional Housing ³			46								
Rapid Rehousing ¹	7	28	4								
Permanent Supportive Housing ⁴	40		155								
Total emergency and transitional housing	58	45	229								
Total Long-term housing with supportive services ⁴	40		155								
Total Numbers ^{5,6}				39	259	11 ⁷	29 ⁶				
Number in emergency shelter ⁵				166							
Number in transitional housing ⁵				46							
Number unsheltered ⁵				86							
Current Gap											
Temporary housing, including emergency shelter, transitional housing, and rapid rehousing options								19	9 ⁸	30	25 ⁸
Permanent supportive housing options ⁹								39	18 ⁸	259	216 ⁸

¹ From Continuum of Care Housing Inventory Count (HIC) for 2021, the most recent available.

² Number includes 31 overflow beds and 40 seasonal beds.

³ The HIC data does not show any transitional housing beds, but the point in time count shows 46 persons in transitional housing.

⁴ Identified through consultation with local service providers through the SIMS work group. The HIC data shows 13 family units with 36 beds and 80 adult only beds.

⁵ Numbers are based upon the 2019 Point in Time Count captured through the Balance of State Continuum of Care, and are the most recent available.

⁶ Number is based upon the 2010 Health Policy Institute of Ohio, profile of Family Violence in Butler County, 29 adults sought shelter in domestic violence shelters in the County. However, also according to this profile, each year there are 3,793 reports of abuse or neglect filed with children's services; 748 children placed into custody; 1,000 people arrested for intimate partner violence; 1,539 people that file petitions for civil protection orders; 227 reports filed of abuse, neglect, or exploitation of seniors. Therefore, housing needs are likely greater than the 29 adults seeking shelter annually.

⁷ This is a double count of persons already counted in the other categories.

⁸ Assumes 2.2 persons per household for families with children, and 1.2 persons per household for adults only households.

⁹ These numbers assume that the current permanent supportive housing units are already occupied by households and unavailable to the current homeless population.

Table 3: Housing Needs Inventory and Gap Analysis Table

Non-Homeless Housing Gap Analysis			
	Current Inventory	Level of Need	Gap Analysis
	# of units	# of households	# of households
Total Rental units ¹	43,456		
Rental units affordable to Extremely Low Income (ELI) households ¹	15,960		
Additional Rental Units Affordable to Very Low-Income Households (at or below 50% AMI) ¹	21,543		
Number of ELI households ²		23,239	
Number of ELI households estimated to be renting based upon % of households that rent vs. own for those below poverty level in Butler County ³		15,803	
Number of Low-Income Households (Between ELI limit and 50% AMI) ²		22,781	
Number of ELI households estimated to be renting based upon % of households that rent vs. own for those below poverty level in Butler County ³		15,492	
Number of affordable rental units to ELI households in the County above the number of ELI households that rent ⁴			+157 (Surplus of homes, but see note ⁴)
Number of affordable rental units to Low Income households in the County above the number of Low-Income households that rent ⁴			+6,051 (Surplus of homes, but see note ⁴)

¹ Numbers of rental units at various contract rents is from the American Community Survey (ACS) five-year data for 2020. Numbers are approximations based upon the data.

² Numbers of households at various income levels is from the ACS five-year data for 2020. ELI and Low-Income Limits by family size are from HUD 2022 Income Limits. Family size for determining

affordability of contract rents was based upon the average household size for Butler County, which is 2.49 persons. Numbers are approximations based upon the data.

³ Rental unit demand was based upon the percentage of households that are below the poverty level that rent rather than own their home (68%).

⁴ Even though the data shows a surplus of rental units. What we see in the data is that many of these rental units are older. What we heard from the many housing providers in the area was that the quality of the housing was much of the problem. Many of the houses are not decent, safe, and sanitary. Also, there is demand from higher income renters for many of these same units, making the reality on the ground more complex. **As noted in Table 1, there are 6,307 renter households and 2,692 owner households below 30% AMI that are paying more than 50% of their income on housing. This means that many of our most vulnerable have little income left for groceries, medicine, and other life necessities. This is more representative of the true gap, and especially highlights the need for affordable housing that is earmarked specifically for this population.**

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Homeless as defined in 24 CFR 91.5

Table 4: Butler County Homeless Population Characteristics			
Of the 298 homeless persons identified in the point in time count ... ¹	... 79, or 27%, had a mental illness	... 78, or 26%, had a substance abuse disorder	... 27, or 9%, were identified as chronic homeless.
	... 73, or 24.5%, were under 18 years old.	... 19, or 6.4%, were 18-24 and 205, or 68.8% were between the ages of 25 and 64.	... only one was over 65 years old.
A larger percentage of the Butler County homeless population had these characteristics, as compared to the Balance of State ... ¹	... were male (+3.7%)	... were Black/African American (+8.5%)	... were unsheltered (+5.5%)
In addition, 189 formerly incarcerated persons in need of permanent supportive housing have been identified. There is likely overlap in the count between these two populations. ²			

¹ Numbers are based upon the 2019 Point in Time Count captured through the Balance of State Continuum of Care, and are the most recent available.

² Identified through consultation with local service providers through the SIMS work group.

According to the 2019 Point in Time Count captured through the Balance of State Continuum of Care, which is the most recent available information, there were 39 homeless family households with at least one child, and 259 homeless adult households. As shown on Table 4, these numbers include people across all of the age groups, although only one person over the age of 65 was identified.

For the January 22, 2019 Point in Time Count, there are approximately 131 persons residing in emergency shelters, 16 persons residing in transitional housing, and 76 persons that are unsheltered. 79 persons (27% of the total) were identified as diagnosed with a mental illness, and 78 (26% of the total) were identified as diagnosed with a substance abuse disorder. 27 (9% of the total) were identified as chronic homeless.

from the January 22, 2019 Point in Time Count, there are approximately 3 Asian, 76 Black/African American, 201 White, and 6 Latino/Hispanic persons experiencing homelessness. Compared with the balance of State, a larger percentage of the homeless population had the following characteristics: More of the population were male (+3.7%); a greater proportion of the population were Black/African American (+8.5%); and a greater percentage of the population were unsheltered (+5.5%).

These distinctions are worth noting. It should also be noted that the overall percentage of the population in Butler County that is Black/African American (10.3%) is less than for the State of Ohio (14.1%), making the distinction of a higher-than-average percentage of the homeless population that is Black/African American more troubling. 25.5% of the total homeless population were Black/African American.

A couple of other groups that need to be called out are the following:

The first is veterans: As identified in the County's 2020 Consolidated Plan, 7.6% of the population are veterans, who also typically have higher rates of disability. There are 11 homeless veterans, all in single person households. The average age of a homeless veteran is 51.

The second is formerly incarcerated persons: The Butler County SIMs group identified 189 formerly incarcerated persons in need of permanent housing. This group is divided primarily between the "homeless" and "at risk of homelessness" qualifying populations.

Table 5: Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	13,522	11,536	19,515	11,958	54,569
Small Family Households	4,396	3,527	7,341	5,037	31,708
Large Family Households	859	758	1,523	1,157	5,691
Household contains at least one person 62-74 years of age	1,717	2,220	4,409	3,185	10,725
Household contains at least one person age 75 or older	1,707	2,592	3,070	1,023	2,684
Households with one or more children 6 years old or younger	2,433	1,827	2,963	1,851	6,904

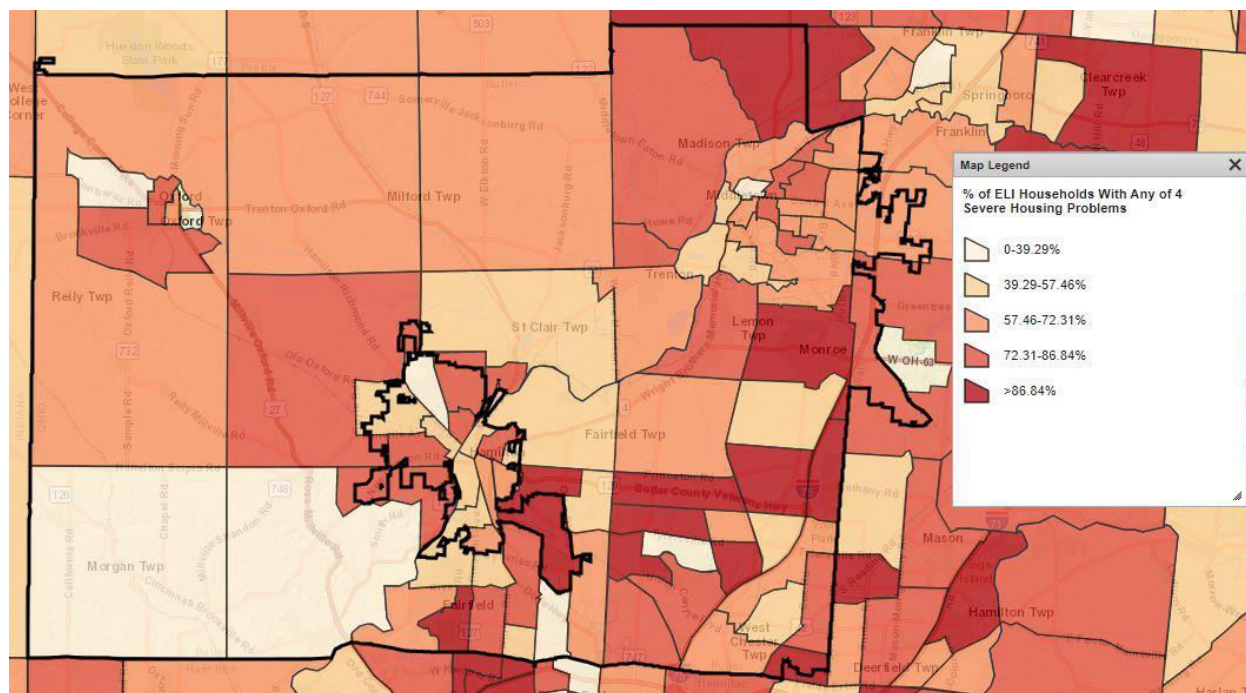
Table 1 - Total Households Table

Data 2011-2015 CHAS
Source:

Table 6: Current 2022 Income Limits for Butler County

FY 2022 Income Limit Area	Median Family Income Click for More Detail	FY 2022 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Cincinnati, OH-KY-IN HUD Metro FMR Area	\$99,100	Very Low (50%) Income Limits (\$) Click for More Detail	33,450	38,200	43,000	47,750	51,600	55,400	59,250	63,050
		Extremely Low Income Limits (\$)* Click for More Detail	20,100	22,950	25,800	28,650	32,470	37,190	41,910	46,630
		Low (80%) Income Limits (\$) Click for More Detail	53,500	61,150	68,800	76,400	82,550	88,650	94,750	100,850

Map 1: Geographic Distribution of ELI Households with Severe Housing Problems



At Risk of Homelessness as defined in 24 CFR 91.5

As identified in Butler County's current Consolidated Plan, from which Table 5 has been taken, there are 13,522 households in Butler County that are in the extremely low- income category. According to the 2020 American Community Survey (ACS) 5-year estimate data profiles (2020 ACS), 7,600 households (5.4% of total households) earned less than \$10,000 a year. Also, according to the 2020 ACS, 43,952 persons (11.5%) in Butler County were below the poverty level. It is also noteworthy that 12,915 children, or 14.4% of all children in the County were also below the poverty level. According to the 2018 ACS, the percentage of persons below the poverty level was even higher, at 42.9% of the total population.

In its 2018 Final Quarterly Performance Report covering the period 1/1/18 to 12/31/18, the Continuum of Care for the Balance of State in Ohio identified facilities operating as shelters, providing permanent housing solutions, conducting rapid rehousing, and offering street outreach services in Butler County. These facilities had a total of 815 households exiting to all destinations. Of those, 600 households (74%) were able to locate to permanent destinations. This left 215 households (26%) in need of a permanent housing solution (see table 12A).

Though this methodology may allow for some double counting, there is still a significant number of households at risk of losing housing and needing a permanent housing solution each year in Butler County.

As shown in Tables 7 and 8, the impact of housing problems and housing cost burden had a disproportionate impact across various racial groups:

- In the income category of 0 to 30% ami, we found that both Black/African American and Hispanic households were disproportionately impacted by the four identified housing problems.
- In the category of households that were severely housing cost burdened, paying over 50% of their income on housing, we found that both Black/African American and Hispanic households were disproportionately impacted.
- In the category of households who had no, or negative income, we found that Asian households were disproportionately impacted.

It is also worth noting that the risk of homelessness has a geographic component. This is illustrated by maps 1 and 2 showing the distribution of ELI households with severe housing problems, and the dispersion of the Black/African American population in the community. In both cases, there is a concentration on the more urban areas of the County, including the City of Middletown.

Table 7:

Races/Ethnicities that are disproportionately impacted by one or more of the four severe housing problems in the income range of 0%-30% of Area Median Income

	Percentage of general population of each race	Number estimated in each race based upon a proportionate distribution	Number impacted by one or more housing problems	Disproportionately impacted?
Jurisdiction as a whole	1.000	9,107	9,107	----
White	0.872	7,941	6,757	NO
Black / African American	0.097	883	1,253	YES
Asian	0.038	346	310	NO
American Indian, Alaska Native	0.009	82	15	NO
Pacific Islander	0.001	9	0	NO
Hispanic	0.046	419	530	YES

Table 17A - Disproportionally Greater Need 0 - 30% AMI

Data Source:	2014-2018 ACS
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Table 8:

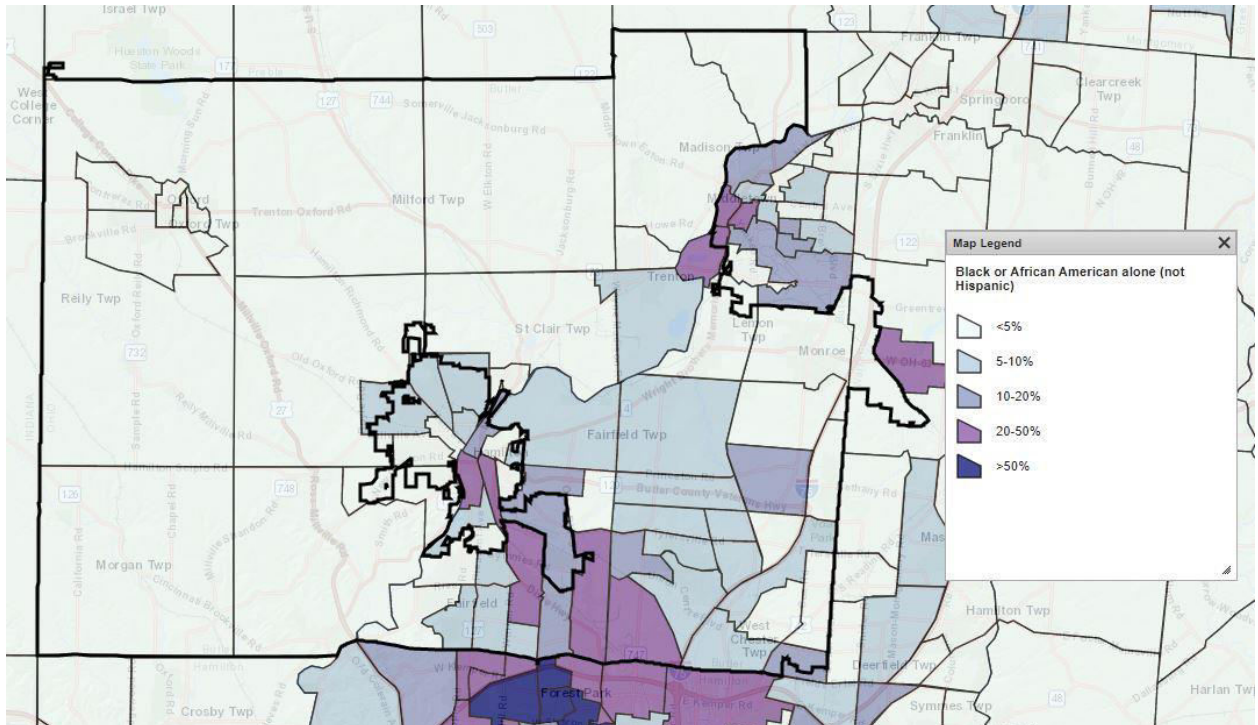
Races/Ethnicities that are disproportionately impacted by Severe Housing Cost Burden, paying more than 50% of their income on housing.

	Percentage of general population of each race	Number estimated in each race based upon a proportionate distribution	Number impacted by one or more housing problems	Disproportionately impacted?
Jurisdiction as a whole	1.000	13,444	13,444	----
White	0.872	11,723	10,392	NO
Black / African American	0.097	1,304	1,563	YES
Asian	0.038	511	395	NO
American Indian, Alaska Native	0.009	121	15	NO
Pacific Islander	0.001	13	0	NO
Hispanic	0.046	618	735	YES

Table 21B - Disproportionally Severely Housing Cost Burdened

Data: 2014-2018 ACS
Source:

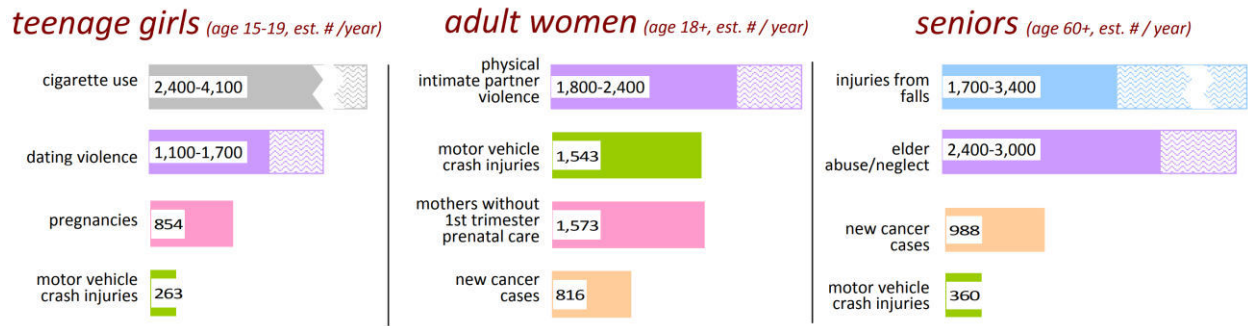
Map 2: Geographic Distribution of the Black/African American Population in Butler County



Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Graph 1: Graphs from Butler County Profile from the Ohio Family Violence Protection Project

In Butler County, how does family violence compare to other threats among ...?



• For example: each year in our county between 1,800 and 2,400 adult women experience physical intimate partner violence; in comparison, 1,543 adult women are injured in motor vehicle crashes.

Based upon the 2010 Health Policy Institute of Ohio, profile of Family Violence in Butler County, 29 adults sought shelter in domestic violence shelters in the County. However, also according to this profile, each year there are 3,793 reports of abuse or neglect filed with children's services; 748 children placed into custody; 1,000 people arrested for intimate partner violence; 1,539 people that file petitions for civil protection orders; 227 reports filed of abuse, neglect, or exploitation of seniors. Therefore, housing needs are likely greater than the 29 adults seeking shelter annually.

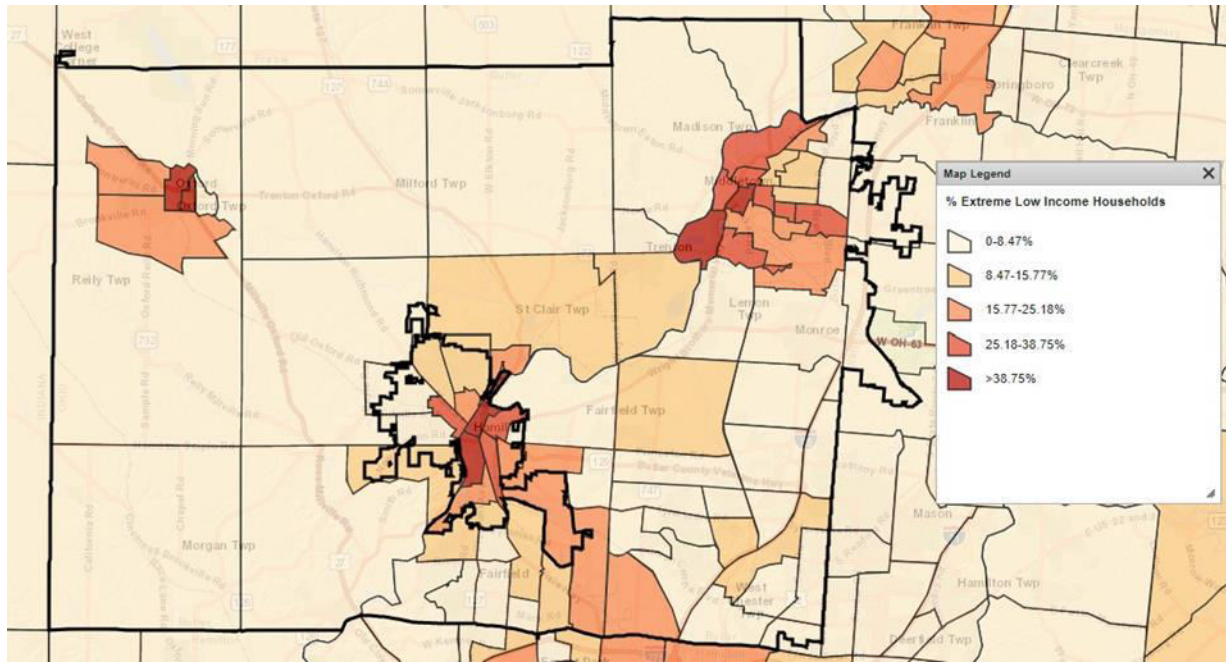
As defined by the Victims of Trafficking and Violence Protection Act of 2000 (otherwise known as the Trafficking Victims Protection Act [TVPA]), human trafficking involves the use of force, fraud, or coercion to exploit another person through commercialized sex or involuntary labor. In cases involving minors, however, the use of force, fraud or coercion does not have to be present for the offense to be classified as sex trafficking because a minor cannot legally consent to commercial sex.

Obtaining Data on human trafficking at the County level has been challenging, but based upon estimates at the State level from various sources, the numbers could be significant. For example, the Ohio Network of Children's Advocacy Centers identified 242 victims who were minors in 2019; the Ohio Attorney General reported 307 victims in 2019; and according to The Ohio Human Trafficking Prevalence Study, Anderson, V. et.al. 2019.

<https://www.humantrafficking.ohio.gov/data-reports.html>, there were 1,078 American-born Ohio youth (aged 12 to 17) that were estimated to have been trafficked for sex over a one-year period.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

Map 3: Concentration of extremely low-income households in the County



HUD's definition of other populations requiring services or housing assistance to prevent homelessness is as follows -

Households (i.e., individuals and families) who:

- have previously been qualified as "homeless" as defined in 24 CFR 91.5
- are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and
- need additional housing assistance or supportive services to avoid a return to homelessness.

This population is difficult to capture. However, we have identified the following populations that appear to be a fit for this category:

- In its 2018 Final Quarterly Performance Report covering the period 1/1/18 to 12/31/18 (the most recent information available), the Continuum of Care for the Balance of State in Ohio identified facilities operating as shelters, providing permanent housing solutions, conducting rapid rehousing, and offering street outreach services. These facilities had a total of 815 households exiting to all destinations. Of those, 600 households (74%) were able to locate to permanent destinations. This left

215 households (26%) in need of a permanent housing solution. We recognize that this methodology allows for some double counting of households who entered and exited the shelter system more than once over the course of a year.

- There are 46 households in transitional housing.

HUD's definition of other populations at greatest risk of housing instability is as follows -

At Greatest Risk of Housing Instability means a household that has:

- Annual income \leq 30% of area median income and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);

OR

- Annual income \leq 50% of area median income and meets one of the conditions of "At risk of homelessness".

As identified in Butler County's current Consolidated Plan, from which Table 5 has been taken, there are 13,522 households in Butler County that are in the extremely low- income category. According to the HUD 2014 to 2018 Comprehensive Housing Affordability Strategy (CHAS) Data (the most recent available), 10,760 Extremely low Income (ELI) households were severely housing cost burdened, paying more than 50% of their income on housing. 7,985 of these households were renters, and 2,775 were owners.

For the second definition, we have no hard data to put into numbers, but we refer back to the numbers of people that enter shelters each year (over 800) as an indicator that there is a significant population at risk of homelessness.

Finally, we mention several other groups that should be considered here, as members of these groups certainly meet the qualifying population criteria:

The first is veterans: As identified in the County's 2020 Consolidated Plan, 7.6% of the population are veterans, who also typically have higher rates of disability. There are 11 homeless veterans, all in single person households. The average age of a homeless veteran is 51.

The second is formerly incarcerated persons: The Butler County SIMs group identified 189 formerly incarcerated persons in need of permanent housing.

The third is those with disabilities: As described in the Consolidated Plan, according to the 2014-2018 ACS, 12.3% (46,200) of the total civilian population has a disability. This compares to 14.0% for the State of Ohio. In Butler County, this includes 5% (4,461) of those under the age of 18, 10.6% (24,747) of those between 18 and 64, and 33.4% (16,992) of those 65 and over. In addition, 14% (52,872) of the total population are 65 and over. This population is particularly vulnerable, since they are more likely to have a low income, and the need for accessible housing further limits their housing choices. According to the Butler County current Consolidated Plan, there is a significant demand for accessible units in Butler

County with 275 disabled families - Public Housing and 479 Voucher families; and 1,011 Public Housing and 1,288 Voucher families requesting accessibility features.

The fourth is persons with a mental health disorder: According to the Butler County Mental Health and Addiction Recovery Services Board Strategic Plan for 2019-2021, 18.3% of adults, or 71,934 Butler County residents were projected to experience mental illness within a 12-month period in 2017, with 4.2% or 15,985 adult residents projected to experience a serious mental illness during this period.

The fifth is persons with an addiction disorder: Also, in 2017, it was projected that of the approximately 332,426 Butler County residents aged 10 and older, 10.7% (35,570 persons) may have used an illicit drug in the past month. 170,202 (51.2%) of Butler County residents 10 and over potentially used alcohol within the past month. 24.4% or 81,112 of this group could be considered binge users, and 6% (19,946) could fall into the category of “heavy” alcohol users. The projected total number of people served by the Butler County Community Mental Health and Addiction system in 2018 was 28,257.

The sixth is older persons: According to the 2020 American Community Survey (ACS) five-year estimate, 56,487 persons, or 14.8% of the total population in Butler County are aged 65 or older. As identified in the County’s 2020 Consolidated Plan, of the households consisting of a single person living alone in Butler County, 9,670 (37%) are 65 years and over. 2,561 (40%) of all households consisting of a single person living alone in the City of Middletown are 65 years and over. People within this age category are more likely than the general population to have financial constraints, physical disabilities, reduced cognitive functioning, and challenges with daily living tasks.

The seventh is female householders with no husband present: another group that is disproportionately impacted by housing problems is female householders, with no husband present. According to the 2020 ACS, 26% of all households in this category were below the poverty level, compared with 11.5% of the general population. Even more pronounced, for families with a female householder, no husband present, with related children under 18 years, 32.9%% were below the poverty level. According to the 2018 ACS, there were 1,893 female households fitting this category in the City of Middletown (4.1% of the total population), and 4,955 households (1.8% of the total population) fitting this category in the County outside of the Cities of Hamilton and Middletown.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

Table 9: Average length of stay in shelters. From the Butler County Consolidated Plan

Name of Facility	Average length of stay in days	Median length of stay in days
Butler - Hope House Rescue Mission - Center of Hope	56.23	54
Butler - Hope House Rescue Mission - Hope House	55.47	45
Butler - Serve City - Chosen	27.57	14
Butler - Family Resource Center – HCRP RRH	56.5	58.5
Butler - Hope House Rescue Mission - Center of Hope – HCRP RRH	117.86	68
Butler - Hope House Rescue Mission - Hope House – HCRP RRH	43.76	31
Table 26A: Average length of stay in shelters, in days		
Data source: Continuum of Care for the Balance of State in Ohio, 2018 Final QPR		

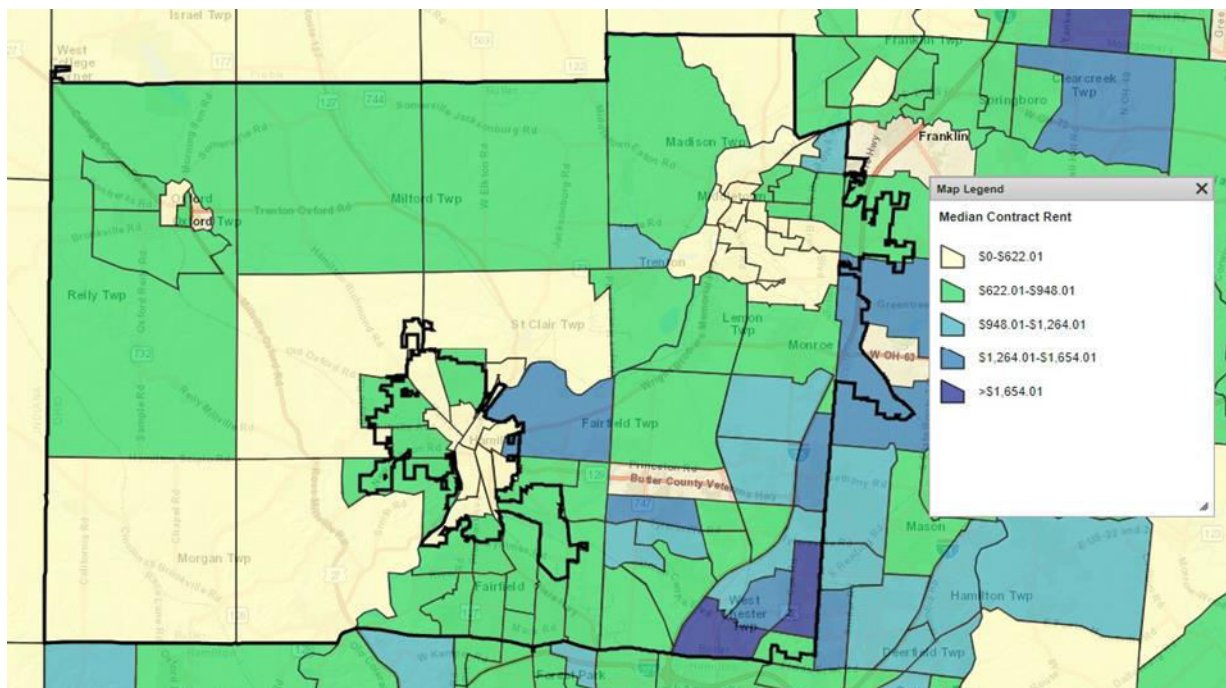
There are a number of organizations addressing housing and service needs of these qualifying populations in Butler County. For example, the Continuum of Care for the Balance of State shows data for each of the facilities providing shelter for homeless persons (see Table 9); several organizations provide services to these populations; the Housing Authority provides tenant based rental assistance; and there are a variety of affordable and supportive housing resources. For further details on these organizations and the services that they provide, refer to the “Consultation” section of this Allocation Plan.

As identified in Table 2, there are 17 family housing units for emergency shelter, and 183 emergency shelter housing units for adults; there are 46 transitional housing units; there are 40 permanent supportive housing units for families, and 155 permanent supportive housing units for adults.

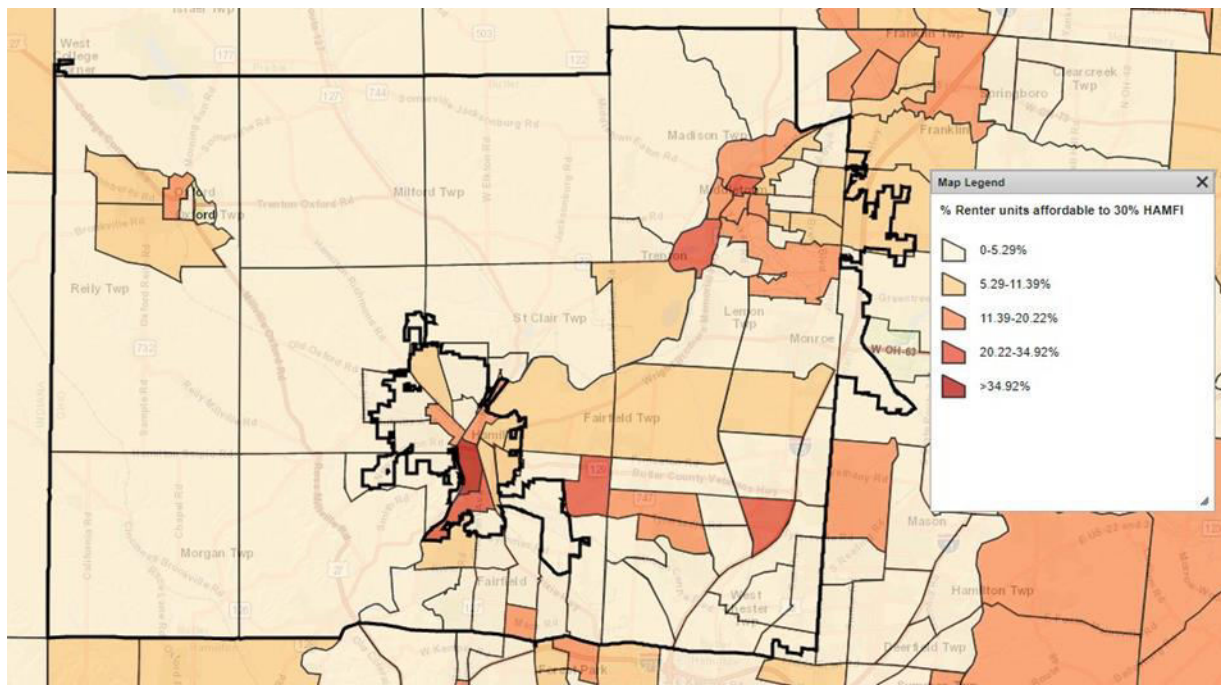
Table 10: Affordable Housing Resources identified by the SIMS Working Group in Butler County

Type	Total
Affordable (general, family, senior)	4,239
Vouchers (EHV, VASH, NED, S+C)	902
PSH units	195
Recovery Housing beds	106
Adult Care Facilities (ACFs/Group Home) beds	52

Map 4: Median contract rents across the County



Map 5: Dispersion of affordable rental units



Describe the unmet housing and service needs of qualifying populations:

Both of the current Butler County and the City of Middletown Consolidated Plans have identified numerous needs associated with housing, as well as for each qualifying population. For example, the City of Middletown outlines the following nine priorities in the 2020-2025 Consolidated Plan, with the priorities specific to homelessness and housing in bold:

1. **Address distressed and dilapidated housing, specifically rehabilitation of owner-occupied housing as one way to address distressed and dilapidated housing. This activity will keep people in decent, safe, and affordable housing, especially low-income and elderly homeowners who are at high-risk for being displaced.**
2. Improve public infrastructure, especially the condition of roads in LMI target neighborhoods.
3. Address lack of amenities such as green space and create strong visual appeal through neighborhood beautification in LMI areas, specifically Oakland.
4. Increase efforts around workforce development to prepare those without employment, those who are underemployed or those not currently in the labor force to be prepared to fill the jobs available in the community.
5. Continue activities to provide safe activities for youth in the City.

6. Leverage partnerships and support efforts to strengthen social services in the City.
- 7. Addressing needs of homeless households.**
- 8. Ensure there is appropriate housing for LMI households**
9. Address issues of fair housing including training, education, and response to fair housing complaints.

Likewise, the Butler County 2020-2025 Consolidated Plan identified 3 primary goals, as follows:

- To improve the quality and affordability of Butler County's and the City of Middletown's housing stock through targeted rental housing rehabilitation and development; acquisition/rehabilitation/resale; new housing construction – homebuyer; down payment assistance; home repairs; and fair housing activities.
- To develop transitional housing, supportive housing, and special needs housing to meet the needs of homeless and special needs populations.
- To revitalize neighborhoods and rural areas through demolition; infrastructure improvements; public facilities; and public services.

Notice that two of these three goals relate directly to the HOME-ARP funding that is the subject of this allocation plan.

Both the City of Middletown and Butler County are parties to this HOME Consortium and jointly submitting this plan. In addition, the City of Hamilton, within Butler County has its own HOME-ARP allocation, and is conducting its own plan. This means that there are three jurisdictions seeking to address the homeless population through this funding. Where it made sense, we have sought to call out separate needs within the various geographies within the County through maps and data. However, it needs to also be recognized that for the qualifying populations and their needs, it is often difficult, or impossible, to separate out the needs by sub-geography in a meaningful way. For example, many of the persons have no address at all, or if they have an address it is at one of the shelters. However, the need, presence, and impact of these qualifying population impacts all of the County's sub-geographies, and they all have a stake in assisting the persons in need. For example, a homeless person might be in Hamilton today, in Middletown tomorrow, and in Milford Township or Oxford next week. For this reason, aggregated data is often the most useful as these communities work together to address these needs.

Homeless as defined in 24 CFR 91.5

As shown on Table 2, there is an identified gap of 9 housing units (19 beds) for temporary housing for families with children. There is also a gap of 25 temporary housing units, or 30 beds for adults only. One of the challenges is that people that are in temporary facilities time out, because there are limits to how long they can remain in a given facility. This is exacerbated by the fact that there are inadequate beds to house everyone in need. Some of the

persons that are in the shelters could be moved into permanent supportive housing if it was available. This would free up the beds for those needing temporary housing.

Regarding services, the service providers identified a huge need for case managers to assist person's with navigating a range of life circumstances. Service providers also noted that because there are specific requirements around those who qualify for services, that many people fall through the cracks, and there is a need to address the needs of this population too.

At Risk of Homelessness as defined in 24 CFR 91.5

As shown on Table 2, there is an identified gap of 18 supportive housing units (39 beds) for families, and 216 housing units (259 beds) for adults only. As described in the narrative under homelessness, moving some of the people in the shelters and other facilities into permanent supportive housing could help to open up beds for those without shelter.

Once again, case management has been identified by the service providers as a huge need. It is also important that there be adequate services tied to the housing that will be provided, to ensure the success of those being housed. For example, they may need assistance with employment, childcare, transportation, counseling, and mental health and/or addiction services.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Though the YWCA of Hamilton, the primary domestic violence shelter in the County, is expanding, there is an unmet need for additional housing units. The County has experienced an uptick in domestic violence during and since the Covid pandemic. While it is difficult to estimate the number of units needed, the need appears to be significant, and growing.

This population also has a need for services such as employment, childcare, transportation, counseling, etc., and these services are best associated with the organization providing the housing in order for a more seamless coordination of needs.

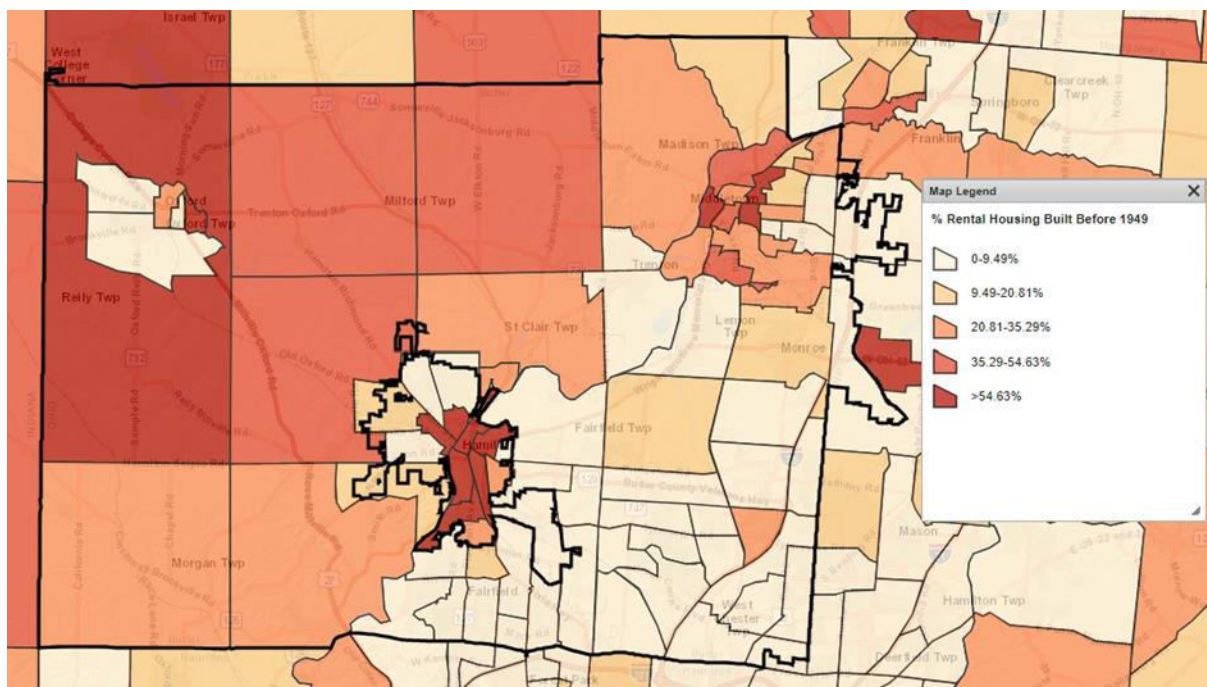
Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

The needs of this group largely mirror the needs identified under "at risk of homelessness". As shown on Table 2, there is an identified gap of 18 supportive housing units (39 beds) for families, and 216 housing units (259 beds) for adults only. As described in the narrative under homelessness, moving some of the people in the shelters and other facilities into permanent supportive housing could help to open up beds for those without shelter.

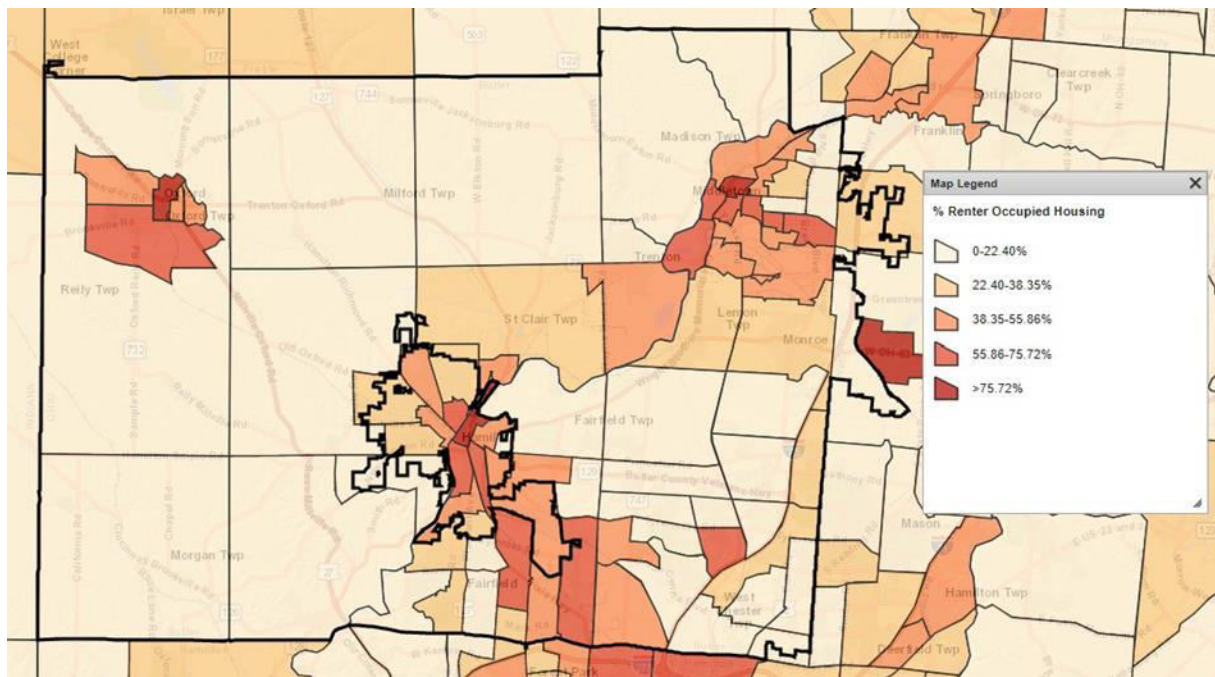
Note that there is also a geographic component to the need, as identified in Maps 4, 5 and 6. In some cases there is a mismatch between identified need and availability of units in a given geographic part of the County. In addition, because much of the affordable housing stock is older (see map 6), the condition of the units also becomes an issue.

Case management has been identified by the service providers as a huge need. It is also important that there be adequate services tied to the housing that will be provided, to ensure the success of those being housed. For example, they may need assistance with employment, childcare, transportation, counseling, and mental health and/or addiction services.

Map 6: Geographic dispersion of older rental units



Map 7: Concentration of renter occupied housing



Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

For temporary housing, there is an identified gap of 9 housing units (19 beds) for temporary housing for families with children, and a gap of 25 temporary housing units, or 30 beds for adults only. There is also a need for additional services for the homeless population, particularly case management, and assistance for those who may not qualify for existing services.

For permanent supportive housing, there is an identified gap of 18 supportive housing units (39 beds) for families, and 216 housing units (259 beds) for adults only, plus addition units needed for victims of domestic violence. There is also a need for services tied to these additional housing units.

In addition, there are 6,307 renter households and 2,692 owner households below 30% AMI that are paying more than 50% of their income on housing. This means that many of our most vulnerable have little income left for groceries, medicine, and other life necessities. This is more representative of the true gap, and especially highlights the need for affordable housing that is earmarked specifically for this population. In other words, we need about 9,000 decent housing units that are affordable to households at or below 30% of area median income.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other

populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

N/A

Identify priority needs for qualifying populations:

The priority needs identified by the County are as follows:

1. Additional permanent supportive housing units to be developed, allowing for persons at risk of homelessness (Q2), victims of domestic violence (Q3), and other populations (Q4) to move from current temporary housing into permanent supportive housing. This will free up the space in the shelters and other facilities for those who are in need of temporary housing solutions (Q1). Also, in the City of Middletown, housing to support the homeless population (Q1).
2. Services tied to this supportive housing, to ensure that needs of the occupants (Q2,3, & 4) are met, so that they can successfully stay in this housing. Services specifically for the homeless population (Q1), to meet the needs of those who may fall through the gaps, and to provide for additional case management.

Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:

The level of need was determined by a thorough review, including the following:

- First a quantitative analysis was done, using data from the US Census Bureau, the Balance of State Continuum of Care, the U. S Department of Housing and Urban Development CHAS, and local data from a variety of sources.
- Second, a qualitative analysis was done based upon a meeting with the public and local stakeholders, multiple interviews with local service providers, and participation in the SIMS working group.

It is our view that the combination of the quantitative data and the qualitative data is vital to good decision making. We tried to both understand what the numbers were telling us about need, and sought to really hear what the housing and service providers, the public, and others who have a good understanding of the needs of this population were telling us. We think that this approach has led to some valid conclusions about priorities regarding need.

HOME-ARP Activities

Template:

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

In both cases, a competitive process will be followed:

For the housing component, Requests for Proposals will be provided to potential housing developers, and will be advertised on the County's or City's website and in the local newspaper. The RFP will outline the requirements that must be met, and will be structured to ensure that high quality units are built in locations where they are needed. The RFP will outline the preferences that must be met. They will also outline the scoring criteria and the underwriting process that will be followed.

The RFPs for service providers will follow a similar process. The RFP will be provided to potential service providers, and will be advertised on the County's or City's website and in the local newspaper. The RFP will outline the requirements that must be met, and will be structured to ensure that high quality and needed services will be provided. The RFP will outline the preferences that must be met. They will also outline the scoring criteria and the underwriting process that will be followed.

Middletown is a HOME Consortium member that will receive 38% of the HOME-ARP allocation as a subrecipient.

Describe whether the PJ will administer eligible activities directly:

Butler County and the City of Middletown will manage the competitive Request for Proposal process, and will ensure oversight of selected developers and service providers throughout the grant period, but will not undertake any activities directly.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

N/A – No subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Table 11: Use of HOME-ARP Funding

Activity Name	Anticipated Outcomes and Budget	Activity Description	Who will be Responsible to Administer Activity?	How will Organization Conducting Activity be Selected?	Eligible Population, Preferences
Development of Affordable Rental Housing – Butler County	20 units of permanent supportive housing ¹ \$1,200,000	Creation of additional housing units affordable to ELI HH, tied to services needed by tenants. Units and services may, or may not, meet formal HUD definition of PSH, but will be matched to identified needs within County. HOME-ARP funds will be leveraged & not more than 20% of the total funding.	Organizations with capacity to develop and manage permanent supportive housing	Through a competitive RFP outlining the goals for the activity, the regulations governing it, the eligible population and allowable preferences, the submission requirements, the scoring criteria, and other activity elements.	ELI households, all Qualifying Populations (QPs) Preferences for QPs 2, 3, and 4 (see note ² below)
Development of Affordable Rental Housing – City of Middletown ³	10 units of Affordable housing \$800,000	New affordable housing development in LMI areas of the City to benefit households transitioning from homelessness. Activities may include construction subsidy for single family or multi-family units.	Organizations with capacity to develop and manage Affordable housing	Through a competitive RFP outlining the goals for the activity, the regulations governing it, the eligible population and allowable preferences, the submission requirements, the scoring criteria, and other activity elements.	ELI households, all Qualifying Populations (QPs) Preferences for QP1 (see note ² below)
Supportive Services – Butler County	280 people assisted \$429,651	Supportive services in three groupings: <ul style="list-style-type: none"> One portion geared to meeting the needs of the homeless population. The other two portions to be tied to the two proposed County affordable housing projects, and geared to the needs of their respective tenants. 	Organizations with capacity to provide and manage needed supportive services	Through a competitive RFP outlining goals for the activity, regulations governing it, eligible population and allowable preferences, submission requirements, scoring criteria, and other activity elements.	ELI households, all QPs Preferences: \$249,651 for QP 1; \$90,000 for QPs 2, & 4; & \$90,000 for QP 3 (see note ⁴)
Supportive Services – City of Middletown ³	250 people assisted \$380,017	Supportive services that include housing search and placement, housing counseling, case management and other services needed to support individuals and families seeking to stabilize their housing.	Organizations with capacity to provide needed supportive services	Through a competitive RFP outlining the goals for the activity, the regulations governing it, the eligible population and allowable preferences, the submission requirements, the scoring criteria, and other activity elements.	ELI households, all Qualifying Populations (QPs) Preferences for QP1 (see note ² below)
Butler County Administration	n/a \$295,641	Admin., planning, program/ project oversight, closeout, & monitoring.	Butler County	n/a	n/a
Total:	\$3,105,309				

Notes for table 11:

¹ Leveraging of funds will be expected, and will be a scoring criterion for projects. Because of this, we anticipate that the total number of units may be greater than the 20 units that can be funded with the funds allocated through this program. These could be new development or rehabilitation of existing units.

² Two projects are anticipated to be completed by the County, one with a preference for Qualifying Populations 2 and 4 below, and the other with a preference for Qualifying Population 3. The goal is twofold, to provide permanent supportive options for those currently living in shelters and other temporary housing, and also to free up space in the shelters, which will also assist Qualifying Population 1, by creating additional space for them. In the City of Middletown, the preference for both of their projects will be Qualifying population 1.

1. Homeless
2. At Risk of Homelessness
3. Fleeing or attempting to flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking
4. Other Populations, which includes Other Families Requiring Services or Housing Assistance to Prevent Homelessness OR at Greatest Risk of Housing Instability

³ Shaded Areas noted are determined by the City of Middletown, as Butler County and the City are in a consortium together and share funding, with 38% of allocated funds going to the City of Middletown.

⁴ It is anticipated that Butler County supportive services funding will be split, with \$249,651 as a preference to those that are homeless and/or in shelters (QP1), \$90,000 supporting those living in the housing being developed, with a preference to QP 2, and 4; and \$90,000 supporting those living in the housing being developed, with a preference to QP 3.

Table 12: Funding allocation by Eligible Activity

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 809,668		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 2,000,000		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 295,641	9.5 %	15%
Total HOME ARP Allocation	\$ 3,105,309		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

HOME-ARP funds will be targeted to meet the priority needs, as identified in the need assessment and gap analysis. The priority needs identified by the County are as follows:

1. Additional permanent supportive housing units to be developed, allowing for persons at risk of homelessness (Q2), Fleeing or attempting to flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking (Q3), and other populations (Q4) to move from current temporary housing into permanent supportive housing. This will free up the space in the shelters and other facilities for those who are in need of temporary housing solutions (Q1). Also, in the City of Middletown, housing to support the homeless population (Q1).
2. Services tied to this supportive housing, to ensure that needs of the occupants (Q2,3, & 4) are met, so that they can successfully stay in this housing. Services specifically for the homeless population (Q1), to meet the needs of those who may fall through the gaps, and to provide for additional case management.

This parallels what we have laid out in our plan, budget, and activity allocation. Our first priority being housing, with some housing being developed for all four QP's

Our second priority is services, with an emphasis on those who will reside in the housing, or who may not get served with existing funding.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

Because there was inadequate housing at all levels, the provision of permanent supportive housing solutions which addressed the needs of QPs 2 (At risk of homelessness), 3 (Domestic violence), and 4 (Other), allowed for those who would move from various facilities into the permanent housing solutions to free up the temporary housing for the Q1 (Homeless) population.

Also, in talking with the service providers, it became abundantly clear that any housing not tied to supportive services would likely be unsuccessful in meeting the needs of the population that is in need of this housing. These service providers also identified other gaps that needed additional funding in order to assist the homeless and other groups in navigating the system.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

30 units of affordable housing are estimated to be built, using \$2,000,000 in funding, which will be leveraged with other dollars.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

The production goal that we seek to meet is 30 units. Because we only have limited HOME-ARP dollars, and because our need for additional units is substantial (234 additional housing units are needed), we knew that we could not meet all of the need. It is anticipated that units will cost over \$300,000 each to produce, and they will also require a variety of services to be tied to the housing throughout the affordability period, at an additional expense to the developer. For the Butler County projects, we are seeking to find a balance, by requiring that the HOME-ARP funding not exceed 20% of the total project funding. This allows us to leverage funds, but also provide a meaningful contribution of gap funding to the project. It also allows us to make a meaningful contribution to addressing our local housing need. For the City of Middletown, they are addressing their most pressing need of housing and services for the Homeless Population (QP1).

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ’s HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

Yes, all of our activities, with the exception of administration, will include a preference for one or more of the qualifying populations, as outlined in Table 11. The use of preferences will be as follows:

- Two Butler County affordable housing projects. One with a preference for qualifying populations 2 (at risk of homelessness) and 4 (other), and the other with a preference for qualifying population 3 (Fleeing or attempting to flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking). Each will put at the top of a waiting list (ahead of those not meeting the preference) any household that is within the qualifying population that is named in the preference.
- One City of Middletown affordable housing project, with a preference for qualifying population 1 (Homeless). Any household that is within the qualifying population that is named in the preference will be put at the top of the waiting list (ahead of those not meeting the preference) for available units.
- Supportive Services for all qualifying populations for Butler County. One portion of the funding will be with a preference to the homeless (QP1). The supportive services for the other three qualifying populations will be tied to the housing in the first bullet above, and these will be provided to residents of the housing being built, which was selected by preference, making the services also selected by preference.
- Supportive Services in the City of Middletown will be with a preference for qualifying population 1 (homeless). Any household that is within the qualifying population that is named in the preference will be put at the top of the waiting list (ahead of those not meeting the preference) for available services.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Because there was inadequate housing at all levels, and for all qualifying populations, the provision of permanent supportive housing solutions which addressed the needs of QPs 2 (at risk of homelessness), 3 (Fleeing or attempting to flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking), and 4 (Other), allowed for those who would move from various facilities into the permanent housing solutions to free up the temporary housing for the Q1 (homeless) population. By providing preferences in this way, it contributed to housing goals for all QPs, while also ensuring that services attached to housing would be appropriate for the population being served.

Also, in talking with the service providers, it became abundantly clear that any housing not tied to supportive services would likely be unsuccessful in meeting the needs of the population that is in need of this housing. These service providers also identified other gaps that needed additional funding in order to assist the homeless and other groups in navigating the system. By separating the funding for services in this way, it ensures that the services provided are a match for the population that they are intended to serve. For the City of Middletown, they are addressing their most pressing need of housing and services for the Homeless Population (QP1).

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

There are activities designated for each qualifying population, as described in Table 13. This table seeks to provide a clearer look at how funding is distributed across the four qualifying populations. Please note that because some activities have more than one preference, that the funding amounts are split (averaged) between these various populations. There is an effort to address the various needs identified through the plan in a balanced manner.

Table 13: Activity budget funding designations by qualifying population

Activity	QP1 – Homeless ¹	QP2 – At risk of homelessness ¹	QP3 – Victims of domestic violence ¹	QP4 – Other populations ¹
Development of Affordable Rental Housing	\$800,000	\$400,000 ²	\$400,000 ²	\$400,000 ²
Supportive Services	\$629,668	\$45,000 ³	\$90,000	\$45,000 ³
Total	\$1,429,668	\$445,000	\$490,000	\$445,000

¹ the full definition of each qualifying population applies, as outlined in the regulations.

² This is an estimated average. The funding allocation of \$1,200,000 covers three qualifying populations, and therefore averages \$400,000 per QP.

³ This is an estimated average. The funding allocation of \$90,000 covers two qualifying populations, and therefore averages \$45,000 per QP.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

Template:

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

n/a

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

n/a

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

n/a

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

n/a

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Template

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

n/a

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

n/a

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

n/a

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- *Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity*

n/a

- *Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.*

n/a

- *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*

n/a

- *Specify the required compliance period, whether it is the minimum 15 years or longer.*

n/a

- *State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*

n/a

- *Other requirements in the PJ's guidelines, if applicable:*

n/a

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

12/05/2022

4. Applicant Identifier:

399017

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Butler County Ohio

* b. Employer/Taxpayer Identification Number (EIN/TIN):

31-6000061

* c. UEI:

WMB8WNGJVD5

d. Address:

* Street1:

130 High Street

Street2:

* City:

Hamilton

County/Parish:

* State:

OH: Ohio

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

45011-2715

e. Organizational Unit:

Department Name:

Department of Development

Division Name:

Community Development

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Susan

Middle Name:

* Last Name:

Ellerhorst

Suffix:

Title:

Community Development Administrator

Organizational Affiliation:

* Telephone Number:

513-785-5391

Fax Number:

* Email:

susan.ellerhorst@bcchio.us

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-239

CFDA Title:

2021 HOME Investment Partnerships Program American Rescue Plan (HOME-ARP)

*** 12. Funding Opportunity Number:**

14-239

* Title:

2021 HOME Investment Partnerships Program American Rescue Plan (HOME-ARP)

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Butler County, Ohio

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

2021 HOME-ARP Allocation Plan in Butler County, Ohio

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant OH-008

* b. Program/Project OH-008

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 09/20/2021

* b. End Date: 09/30/2030

18. Estimated Funding (\$):

* a. Federal	3,105,309.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	3,105,309.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr. * First Name: Donald

Middle Name:

* Last Name: Dixon

Suffix:

* Title: President, Butler Cty Board of Commissioners

* Telephone Number: 513-887-3274 Fax Number: 513-887-3505

* Email: don.dixon@bcchio.us

* Signature of Authorized Representative:



* Date Signed: 12/8/22

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official

12/5/22
Date

President, Butler County Board of Commissioners Donald L. Dixon

Title

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

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PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	President, Butler Cty Board of Commissioners Donald L. Dixon
APPLICANT ORGANIZATION	DATE SUBMITTED
Butler County, Ohio	12/5/22

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


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NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
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8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE President, Butler Cty Board of Commissioners Donald L. Dixon
APPLICANT ORGANIZATION Butler County, Ohio	DATE SUBMITTED 12/5/22



Board of County Commissioners
Butler County, Ohio

EXECUTIVE SUMMARY

22-12-01924

Donald L. Dixon
President

T.C. Rogers
Vice President

Cindy Carpenter
Member

HUD Action Plan Amendment - HOME - ARP

Community Development
An Inter-Departmental Review

Target Meeting: 12/5/22

Summary

Approve Amendment to the 2021 Annual Action Plan, previously approved through Resolution No. 21-04-00498 on April 12, 2021 and submitted to the Department of Housing and Urban Development, to incorporate the proposed HOME-ARP Allocation Plan for funding and authorize the Community Development Administrator to submit the documentation required by the Department of Housing and Urban Development to effectuate said Amendments.

Justification

Substantial Amendment for Program Year 2021 HOME-ARP funds.

Recommendation

The Community Development Division recommends approval.

Approved by:

David Fehr

David Fehr, Director of Development

11/2/2022

Judi Boyko

Judi Boyko, County Administrator

11/2/2022



Board of County Commissioners
Butler County, Ohio

ADOPTED
DECEMBER 5, 2022

RESOLUTION

22-12-01924

Donald L. Dixon
President

T.C. Rogers
Vice President

Cindy Carpenter
Member

HUD Action Plan Amendment - HOME - ARP

The Board of County Commissioners of Butler County, Ohio met in Regular Meeting on the 5th day of December, 2022 in the Commission Chambers of the Butler County Government Services Center, 315 High Street, 2nd Floor, Hamilton, Ohio 45011.

Whereas ORC 307.85(A) authorizes the Board of County Commissioners to participate in, give financial assistance to, and cooperate with other agencies or organizations, either private or governmental, in establishing and operating any federal program enacted by the Congress of the United States, or with any such agency or organization that is receiving federal funds pursuant to a federal program, and for such purpose may adopt any procedures and take any action not prohibited by the Constitution of Ohio nor in conflict with the laws of the state of Ohio;

Whereas Butler County, with a threshold population in excess of 200,000, is an "Urban Entitlement County" and therefore receives direct annual funding from the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Programs and other special grants from time to time;

Whereas these grants and programs are utilized to assist the low-income residents of Butler County by providing for assistance in obtaining and maintaining safe housing and other needed infrastructure projects;

Whereas to maintain Butler County's compliance with said grant programs, the Board of County Commissioners adopted its Resolution No. 21-04-00498 on April 12, 2021 to approve and authorize submittal of the 2021 Annual Action Plan (the "Plan") required by HUD which guides grant programming through measurable goals and objectives;

Whereas the U.S. Department of Housing and Urban Development (HUD) requires a HOME-ARP Allocation Plan submittal before releasing of the remaining award funds;

Whereas Butler County Commissioners adopted its Resolution No. 22-04-00648 on April 25, 2022 for the Harsany & Associates LLC. Agreement for the HOME – ARP Allocation Plan as a Substantial Amendment to the County’s FY 2021 Annual Action Plan;

Whereas Harsany & Associates LLC. used quantitative and qualitative data for the gap analysis of housing needs inventory and homeless needs inventory. The quantitative data gathered from Continuum of Care, local service providers, HUD, the U.S. Census Bureau, etc. and the qualitative data collected from the public meeting, interviews with stakeholders and service providers were incorporated into the HOME-ARP Allocation Plan;

Whereas Butler County held, a virtual public meeting on Tuesday, May 24, 2022 from 3:00 p.m. – 4:00 p.m. and a Public Hearing through Resolution No. 22-10-01626 on Monday, October 17, 2022 at 9:30 a.m. to gain input from stakeholders and the public comments on addressing the needs of the homeless, increasing housing stability and the Allocation Plan;

Whereas Harsany & Associates LLC. provided a presentation at the Public Hearing on the Allocation Plan and recommendations for the funding listed in the table below;

Whereas to ensure timely expenditure of funds, and/or to reflect changes to the scope of the activities and programs identified in an approved Annual Action Plan, the County Community Development Office is recommending amendments to the Plan in accordance with HUD regulations; now, therefore, be it

Resolved that the Board hereby approves the following amendments to the Plan, as previously approved and submitted to HUD, and authorizes the Community Development Administrator to submit the documentation required by HUD in regards to such amendments, to wit:

Project Name: HOME-ARP Allocation Plan	Amount
Butler County Development of Affordable Rental Housing	\$1,200,000.00
Butler County Supportive Services	\$429,651.00
City of Middletown Development of Affordable Rental Housing	\$800,000.00
City of Middletown Supportive Services	\$380,017.00

Butler County Administration and Planning

\$295,641.00

be it further

Resolved that the Board of County Commissioners hereby finds and determines that all formal actions relative to the adoption of this Resolution were taken in an open meeting of this Board, and that all deliberations of this Board and of its committees, which resulted in those formal actions, were in meetings open to the public in compliance with the law.

Commissioner Carpenter moved for the adoption of the foregoing resolution, Commissioner Rogers seconded the motion and upon call of the roll, the vote resulted as follows:

RESULT: Adopted

AYES: Donald Dixon, T.C. Rogers, Cindy Carpenter

State of Ohio, County of Butler, on this 5th day of December, 2022, the Clerk of the Board does hereby certify that 22-12-01924 is a true, exact, complete and unaltered electronic record of the Butler County Board of Commissioners.

Flora Butler

Flora Butler, Clerk of the Board



JOURNAL-NEWS

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www.wittproperties.org
513-312-5185

Whether you're looking for jobs, cars, homes, a dog for the kids, a used bugle or violin, garage sales, or a little bit of everything - you can find it with us!

for rent in butler

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1 Story, Walk to Downtown
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\$100 OFF FIRST FULL MONTH
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Middletown, OH 45044
513-424-2013

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for rent site/mobile/manuf home

MASON - Shadow Lake MHP. Own a home in as little as 3 years! Under \$600/mo! Financing avail on single & dblwide homes 513-398-5966

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for sale in butler

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DAILY LAW JOURNAL

legal notices

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, filing an appeal, or ADA accommodations may be obtained at: <https://epa.ohio.gov/actions> or Hearing Clerk, Ohio EPA, 50 W. Town St. P.O. Box 1049, Columbus, Ohio 43216. Ph: 614-644-3037 Email: H.Clerk@epa.ohio.gov

Application Received for Air Permit Koch Foods Inc 4100 Port Union Rd, Fairfield, OH 45014 ID #: A0072583 Date of Action: 09/23/2022 Installation of new Cook Lines 10, 11, & 12, and associated support equipment.

Final Issuance of Permit-To-Install and Operate City of Fairfield Wastewater Treatment Plant 4799 Groh Lane, Fairfield, OH 45014 ID #: P0132773 Date of Action: 09/26/2022 PTIO renewal for a 3.45 MMBtu boiler and four sewage sludge digesters located at a municipal wastewater treatment facility.

Final Approval of Plans and Specifications Butler Co Water Dist 2 PWS 130 High St, Hamilton, OH 45011 Facility Description: Community Water System ID #: 1508346 Date of Action: 09/27/2022 This final action not preceded by proposed action and is appealable to ERAC.

Detail Plans for PWSID:OH0900303 Plan:1508346 Regarding Freedom Pointe-WM Improvements.

Final Approval of Plans and Specifications Oxford City PWS 15 S College Ave, Oxford, OH 45056 Facility Description: Community Water System ID #: 1492681 Date of Action: 09/27/2022 This final action not preceded by proposed action and is appealable to ERAC.

Detail Plans for PWSID:OH09002312 Plan:1492681 Regarding Owl's Land-ing. 10-2/2022

Notice is hereby given that the West Chester Township Trustees adopted the following resolutions at their regular meeting on Tuesday, September 27, 2022: Statutory Resolution No. 26-2022 finding four police department vehicles are not needed or are unfit for public use and Emergency Resolution No. 27-2022 amending the Township 2022 Permanent Appropriations and declaring an emergency and dispensing with the second reading - attest: Bruce Jones, Fiscal Officer. Complete text may be viewed or obtained at the office of the West Chester Township Fiscal Officer, 9113 Cincinnati-Dayton Road, West Chester, Ohio 45069, 8:30 a.m. To 4:30 p.m. Monday through Friday.

West Chester Township Trustees Bruce Jones, Fiscal Officer Larry D. Burks, Township Administrator 10-2, 10-12/2022

public hearing

NOTICE OF PUBLIC HEARING 2021 Action Plan Substantial Amendment for HOME-ARP Allocation Plan

Butler County will be submitting a Substantial Amendment for 2021 Annual Action Plan to the U.S. Department of Housing and Urban Development (HUD). The Amendment consists of changes to the Home Investment Partnership Program (HOME) Grant to include the HOME-ARP Allocation Plan.

A public hearing for informational purposes and public comments relative to the HOME-ARP Allocation Plan for Butler County will be held on October 17, 2022 at 9:30 a.m., located in the Commissioners' Hearing Room on the sec-

public hearing

ond floor of the Butler County Government Services Center, 315 High Street, Hamilton, Ohio and online at <http://butlercountyoh.igm2.com/Citizens/default.aspx>.

The Butler County / City of Middletown Consortium was awarded \$3,105,309 in HOME - American Rescue Plan (HOME-ARP) funds in a one-time allocation from the U.S. Department of Housing and Urban Development (HUD) to benefit the residents of both Butler County and the City of Middletown.

The Butler County Allocation Plan for the HOME-ARP and substantial amendment will be available for public review and comment from October 2 through October 17, 2022 on the website <http://development.butlercountyohio.org/content/txtcontent/cd/cdhome.cfm> and at Butler County Community Development, 130 High Street 6th Floor, Hamilton, Ohio, 45011. Written comments relative to the Allocation Plan can be mailed to the above address or emailed to susan.ellerhorst@bcchoio.us.

HUD is requiring an Allocation Plan from Butler County to receive the federal HOME-ARP funds. The HOME-ARP Allocation Plan is a strategic plan detailing the allocation of funding to assist individuals or households who are experiencing homelessness, at risk of homelessness, victims of domestic violence, and other vulnerable populations, by providing affordable housing, rental assistance, supportive services, and/or non-congregate shelter, to reduce homelessness and increase housing stability for qualifying populations. The Allocation Plan defines the use of federal HOME-ARP grant funds to address these needs.

Copies of this Public Notice will be distributed to approximately one dozen partner entities serving a significant population of persons who are in legally protected classes, may have barriers to public participation, are vulnerable, and/or may be eligible for assistance through these funds. This includes persons in a racial/ethnic minority, persons with disabilities, female heads-of-households, abused spouses, persons with HIV/AIDS, persons experiencing/at risk of homelessness, etc.

Butler County will provide assistance to non-English-speaking persons, persons with limited English proficiency, and/or persons with disabilities, needing interpreters or other auxiliary aids and services in order to participate in this hearing. Any request for such assistance must be made no later than 48 hours in advance of the hearing, by contacting the Community Development Division at (513) 785-5391.

By order of the Butler County Board of Commissioners.

Susan Ellerhorst Community Development Administrator 10-2/2022

LEGAL AD WEST CHESTER TOWNSHIP BOARD OF ZONING APPEALS 9577 BECKETT ROAD, SUITE 100 WEST CHESTER, OH 45069

Notice is hereby given that a public hearing will be held by the West Chester Township Board of Zoning Appeals on Wednesday, October 12, 2022 in the Township Hall-West Chester Administration Building, 9113 Cincinnati-Dayton Road, at 6:00 p.m., for the purpose of hearing the following application(s):

BZA 22-08 Christopher Laxton has filed a variance request from Article 10.24b to permit an 8'H fence where 6'H is permitted for the property located at 7682 Christine Avenue.

Plans for the above mentioned cases are on file and open for public review in the West Chester Township Community Development Department, 9577 Beckett Road, Suite 100, West Chester, Ohio 45069. Office hours are 8:30 a.m. to 4:30 p.m., Monday-Friday.

West Chester Township Board of Zoning Appeals Aaron Wiegand Community Development Director 10-2/2022

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Antique Auction Sun. Oct. 9 10:00 AM Germantown, OH 45327 101 Triangle Ct. SR 725 & 4 to behind McDonalds Antiques; china & glassware; banks; Wapak Indian #9 skillet; Griswold advertising alarm clock; caramel slag glass lamp; Globe & Lightning canning jars; Planters Peanut counter jar; 1914 & 17 license plates; Aladdin lamp; Coca Cola; stoneware; child's singer sewing machine; tin toys; dolls; oak ice box; barrister bookcase; lots of antique furniture; hand & yard tools Smith Complete Auction Serv. LLC Germantown 937-855-2859 auctionzip.cm #2669

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