



January 13, 2017

Jorgelle Lawson, Director
Office of Community Planning and Development
Columbus Field Office
200 North High Street
Columbus, Ohio 43215-2499

Dear Ms. Lawson,

Please find enclosed the written response to your December 15, 2016, letter addressing the additional unresolved issues your office had with our PY2015 CAPER.

Issue #1

Grantee exceeded the 20% administrative cap. An updated PR-26 was provided; however, the obligation still exceeds the 20% cap by \$3,396.05. Review and ensure the administrative costs have been correctly categorized. Provide an updated PR-26 as needed.

Response: After looking back through the action plans over the last few years, it was discovered that the amount of the administrative funds were not correctly carried over from one program year to another. This cause an error in budgeting correctly, therefore causing Middletown to exceed the cap. Moving forward, we will ensure that any carryover is correctly budgeted in the new program year and the City will include the \$3,396.05 overage in its calculations for Program Year 2016.

Issue #2

CR-15: Resources and Investments – Table 3-Provide information for the source, resources made available, and narrative. Table 4-Provide actual percentage of allocation, narrative description, and overall narrative.

Response: The City of Middletown was awarded \$684,806 for PY2015 and was able to spend approximately 85% of it. The City is also in a H.O.M.E. Consortium with Butler County to provide down payment assistance to low-income families that meet the qualifications. Middletown was able to help 35 families become home owners with an average of \$5,000 going to each family. During PY2015 we distributed our CDBG allocation throughout the

entire City. For future program years we will be working in more specific target areas based of Census data.

Issue #3

CR-25: Homeless and Other Special Needs – *Helping low-income individuals and families avoid becoming homes, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharge from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.* The CAPER states that PWC offers programs to persons with disabilities. In addition, the City has a wide variety of subsidized housing options. Specify how PWC is helping low-income individuals and families avoid becoming homeless, especially extremely low-income individual families; those likely to become homeless after being discharged from publicly funded institutions and systems of care; and receiving assistance from agencies that address housing, health, social services, youth needs, etc.

Response: People Working Cooperatively work with low-income individuals and families to have safe and quality housing. They assist with emergency repairs and modifying homes as needed for disabled citizens. They do not directly work with preventing homelessness and should not have been added to this section. The City of Middletown is an active participant in the Butler County Housing and Homeless Coalition. Additionally, Butler Metropolitan Housing Authority (BMHA) has a working relationship with Transitional Living who provides mental health assessment and permanent housing placement services. Also, Hope House Rescue Mission services approximately 400 yearly who need temporary shelter. The shelter houses 48-50 people daily. Hope House has programs in place that not only provide temporary housing (normally 3-6 months) but also connect with County services (Transition Living/ Section 8) and in-house case management programs to help these families start over. The City also operates a public transit shuttle to Hamilton, the County seat, providing transportation to low income and homeless persons to county agencies. In addition Legal Aid of Greater Cincinnati provided foreclosure prevention services to help prevent the loss of housing. The Community Revitalization Department Director serves on the county-wide foreclosure prevention group and on the county-wide homeless prevention coalition.

Issue #4

CR-35: Other actions –

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j) – The CAPER speaks to the demolition of residential properties in various stages of disrepair that are creating significant blight in the City. The narrative does not address how demolition is meeting underserved needs.

Actions taken to reduce the number of property-level families. 91.220(k); 91.320(j) - The CAPER advises that the City of Middletown partners with numerous non-profits to ensure that

poverty level families are getting access to services, The narrative does not detail what specific actions have been taken to reduce the number of poverty – level families or how existing partners have assisted.

Actions taken to enhance coordination between public and private housing and social services agencies. 91.220(k); 91.320(j) – The narrative does not provide information on the number of participant in the county-wide foreclosure prevention group and any accomplishments.

Response: The largest obstacle to meeting under-served needs remains inadequate ongoing funding. In 2012, the City received a large grant (Moving Ohio Forward) for the sole purpose of residential demolition. That was been a tremendous help in removing a portion of the vacant residential properties in various stages of disrepair that are creating significant blight in the City which in turn are lowering neighborhood home values and creating further vacancies. Continuous funding for such demolition efforts over the next several years could fix most of the City’s problem with vacancies and help increase property values. However, that was a one-time grant, and while appreciated, it will only resolve a portion of the problem. The City of Middletown was awarded demolition grant money through the Neighborhood Improvement Program in conjunction with the City of Hamilton. We are working on identifying properties that meet this grant’s requirements for demolition. Demolition will continue to be a focus the upcoming program year coupled with heavy code enforcement. The Community Revitalization Department will continue to remove blight wherever possible, rehab whenever feasible, and fill quality properties with new homeowners whenever possible.

The City of Middletown uses the anti-poverty strategies contained in the Consolidated Plan. The plan included the use of governmental and non-profit agencies to operate programs within Middletown and Butler County to reduce dependency and poverty among city residents. Of the agencies listed in the consolidated plan, the City utilized the following:

- **People Working Cooperatively** - Provided critical home repairs, energy conservation and maintenance services for low-income homeowners and weatherization for renters. In PY2015, PWC provided \$50,000.00 in 55 calls to service.

- **Middletown Homeownership Partnership/HOME Program-Funded Down Payment/ Closing Cost Assistance** - Provided qualifying home buyers with up to \$5,000 for down payment and closing cost assistance. In 2015, assistance was provided to 35 home purchasers within the City of Middletown.

- **Neighborhood Housing Services** – NHS has been a partner providing administrative services for Middletown’s HOME funded down payment assistance program. They also provided home buyer education classes.

- **Housing Opportunities Made Equal** – H.O.M.E. provides fair housing assistance to people who feel they are victims of illegal housing discrimination. They investigate complaints of fair housing violations and offer courses of action to protect housing rights. Client services

are free. In PY 2015, HOME investigated 38 claims, successfully resolving all complaints. In addition, they provided fair housing outreach to 21 other agencies, conducted 3 fair housing classes/booths/seminars, and completed 15 test cases to investigate any fair housing violations.

- **Legal Aid** – The City of Middletown, through its CDBG funding, provides financial support to Legal Aid of Southwest Ohio to provide legal services to low and moderate income tenants to protect their rights and improve their access to quality affordable housing. Through CDBG funding, they were able to help 38 people in the 2015 program year.

In addition, the City of Middletown’s Community Revitalization Director is a member of the Butler County Foreclosure Prevention group as well as the Homeless Coalition. These groups meet monthly to discuss current events and strategies to help alleviate these issues where possible.

Issue #5

CR-40: Monitoring – *Describe the standards and procedures used to monitor activities carried out in the furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements.* Provide a detailed response that address the standards used during monitoring.

Response: In Program Year 2015, the City of Middletown conducted telephone and desk reviews at least quarterly for each sub recipient. For in-house projects, reviews were ongoing to assure project guidelines were met. Sub recipient monitoring indicated overall program compliance.

Issue #6

Self-evaluation not included. Provide self-evaluation.

1. Response: Self Evaluation

- a. Describe the effect programs have in solving neighborhood and community problems.
- b. Describe progress in meeting priority needs and specific objectives and help make community’s vision of the future a reality.
- c. Describe how you provided decent housing and a suitable living environment and expanded economic opportunity principally for low and moderate-income persons.
- d. Indicate any activities falling behind schedule.
- e. Describe how activities and strategies made an impact on identified needs.
- f. Identify indicators that would best describe the results.
- g. Identify barriers that had a negative impact on fulfilling the strategies and overall vision.

- h. Identify whether major goals are on target and discuss reasons for those that are not on target.**
 - i. Identify any adjustments or improvements to strategies and activities that might meet your needs more effectively.**
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- a) PY2015 projects had measurable effects on neighborhood and community problems. The City returned 1627 housing violations back to property maintenance code compliance. The City resolved 3,752 nuisance complaints for trash and/or tall grass.*
 - b) All activities funded during PY2015 made an impact on the needs and objectives identified in the Consolidated Plan as measured by the number of persons and households directly and indirectly benefiting from the activities.*
 - c) In PY2015, the City of Middletown provided decent, safe and affordable housing through a variety of housing rehab projects funded through NSP3 as well as code enforcement initiatives. The City utilized HOME funds to provide down payment assistance to 35 new homeowners.*
 - d) None*
 - e) The demolition of dilapidated and abandoned housing continues to be a priority. Demolition, NSP housing rehab, and aggressive code enforcement have produced noticeable, visual revitalization progress in the target neighborhoods. The City continues to aggressively pursue irresponsible home owners and landlords that contribute to the decay of the housing stock in the City.*
 - f) Success is measured by the number of properties inspected and found to have code violations compared to the number of violating properties that were resolved. Success is also measured by comparing the total number of blighted/vacant properties against the total number that were demolished and removed from the City's housing stock.*
 - g) The largest barrier to meeting community needs is ongoing sufficient funding. In the City's Consolidated Plan, it is estimated that the City requires over 10 times its current funding level to address all identified needs. While NSP, Moving Ohio Forward, and Neighborhood Initiative Program funding has helped significantly, more long-term sustainable funding is needed to ensure revitalization efforts keep moving forward.*
 - h) All major goals are on target.*
 - i) No improvements needed at this time.*

Sincerely,



Rachel D. Cox
HUD Program Administrator