

City of Middletown, Ohio
Consolidated Plan 2020-2025

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Executive Summary

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

1. Introduction

The Consolidated Plan for the City of Middletown has been prepared in response to a consolidated process developed by the U.S. Department of Housing and Urban Development (HUD) for the Community Development Block Grants (CDBG) program.

This Consolidated Plan outlines housing, community and economic development needs, priorities, strategies, and projects that will be undertaken by the City of Middletown with the funds that the City receives from the U.S. Department of Housing and Urban Development (HUD). As an entitlement community, the City receives an annual share of federal Community Development Block Grant (CDBG), and through the Butler County HOME Consortium, Home Investment Partnership (HOME) funds. In order to receive its CDBG entitlement, the City must submit this Consolidated Plan and First Year Annual Action Plan to HUD. The funds are intended to provide lower and moderate-income households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, development activities, public services, economic development, planning, and program administration.

The Consolidated Plan serves primarily as a planning document to guide the City's community revitalization and development efforts particularly for low and moderate income households in the community. The document is developed in accordance with established HUD guidelines for public input and participation. A secondary use of the document is as an application for federal funds under HUD's formula grant programs and the accompany strategy for how the City will impact the community using HUD funds and leveraged funds to accomplish the five-year objectives. The plan includes performance metrics as a basis for assessing performance over the life of the plan.

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

The City has a number of priority needs which can be delineated into the two categories of (1) supports to help low-income families and (2) community revitalization activities.

Many of Middletown's residents are economically challenged. The median household income in the City is \$39,116, which is 74% percent of the state average of \$52,407 and 62% of the national average of \$63,179. Activities and programs that tackle issues of poverty and help households and families become more income-stable are a critical and high priority need in the community.

Community revitalization efforts are directly tied to the economic challenges of the community. Many of the community's neighborhoods have aged without reinvestment. Housing has become challenging as older homes continue to deteriorate and many formerly owner-occupied dwellings have turned into rental

properties, many with absentee landlords. The condition of the housing market in Middletown has resulted in significant drops in property value making the tax revenue decrease and adding to the overall economic challenges in the community. A concentrated effort to maximize federal investment of CDBG and HOME through concentrated neighborhood revitalization is critical to improving the City's overall health and well-being.

The City has commissioned and performed several significant data studies to inform its strategy moving forward. Distressed neighborhoods have been identified with a prioritization of place-driven strategies to improve overall conditions. Blight has been and continues to be strategically removed throughout the City, particularly in LMI census tracts. Code enforcement has worked to identify problem properties in LMI tracts and work with property owners to bring them up to code.

Other needs impacting LMI target neighborhoods were identified through these commissioned data studies, namely 1) distressed and dilapidated housing, 2) poor street conditions, and 3) lack of amenities and attractive neighborhood appeal. In addition, city-wide there are needs with regard to economic conditions of the community, namely 4) lack of qualified workforce 5) limited youth activities, 6) insufficient social services including mental health and substance use treatment. These six identified needs are included as priorities in the five-year consolidated plan. In addition, the City actively collaborates with other initiatives involving HUD partnerships through Butler Metropolitan Housing Authority, fair housing partner (Housing Opportunities Made Equal), and Continuum of Care for the homeless (Butler County Housing and Homeless Coalition). These partners address HUD priorities which include 7) addressing needs of homeless households, 8) ensuring there is appropriate housing for LMI households; and 9) fair housing activities. These three additional needs are included as priorities in the five-year consolidated plan.

The City will undertake the following activities to address the nine identified priority needs in the five-year consolidated plan.

- 1) Distressed and dilapidated housing: The City will use 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) Poor street conditions: Public infrastructure, especially the condition of roads in LMI target neighborhoods, are a significant need and high priority.
- 3) Lack of amenities and attractive neighborhood appeal. The City has identified the neighborhood of Oakland as its priority LMI area for this comprehensive plan. Funds will be targeted to help address lack of amenities such as green space and create strong visual appeal through neighborhood beautification.
- 4) Lack of qualified work force. The City has a strong strategy to address issues of generational poverty and strengthen the economic core of the community. This strategy connects public and private resources with partner efforts to improve the local economy. Through the five-year Consolidated Plan the City will work specifically on efforts of 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) Lack of youth activities. The City will continue activities to provide a safe haven for youth in the City. Through its partnership with Community Building Institute, the City will be able to continue its work to meet the activity needs of LMI youth.

6) Insufficient social services including mental health and substance use treatment. The City will continue to leverage established partnerships and actively support efforts to strengthen social services in the community.

7) Addressing needs of homeless households. The City's homelessness strategy was developed in cooperation with the Butler County Housing and Homeless Coalition (BCHHC). The City has an appointed member on the Board and serves to cooperate with the balance of the county to support persons experiencing homelessness. The strategic priorities of BCHHC include advocating for individuals and families experiencing or facing homelessness; ensuring there is an adequate system of care for those experiencing homelessness; and supporting projects that enhance and improve the continuum of care for those experiencing homelessness in the community. The Coalition serves as the primary vehicle for public and private entities serving the homeless to work cooperatively to prevent homelessness, serve persons through a shelter system who are experiencing homelessness and responsibly rehouse persons into permanent, stable housing as quickly as possible.

8) Ensuring there is appropriate housing for LMI households: The City has significant numbers of affordable housing rental units in the community. The City will continue to draw on its affordable housing partners such as Butler Metropolitan Housing, Butler County Housing and Homeless Coalition and Neighborhood Housing Services to ensure LMI renter households have decent, safe and sanitary housing options. In addition, the City will continue to offer down payment assistance for LMI homeowners and work through key partners to provide LMI homeowner repairs and rehabilitation.

9) Fair housing activities: Fair housing continues to be a priority for the City, specifically education and responses to fair housing complaints. The activities will be addressed through the partnership with HOME.

3. Evaluation of past performance

The City has strong outcomes as a result of its past performance. Blight has been tackled and significantly decreased over the past five years. Strong enforcement of local code has significantly decreased the number of repeat violations and nuisance properties. Activities around public services, especially those involving youth have been effective. Fair housing awareness and education are ably met through the HOME partnership and complaints are investigated and appropriately addressed. Low income homeowners have received help to correct code violations and many have received help to rehab their homes. New homeowners have become part of the fabric of the community as a result of down payment assistance. The City has increased its involvement with local initiatives that contribute to the health and well-being of LMI households including Butler County Land Bank and the Butler County Housing and Homeless Coalition. The performance metrics and extent of the City's accomplishments are detailed in the City's CAPER.

4. Summary of citizen participation process and consultation process

As noted in PR-10, Consultation, well publicized public hearings were held on two occasions – March 3, 2020 and April 21, 2020 at City Hall, One Donham Plaza, Middletown, Ohio. These sessions were part of a

strategic effort to maximize participation by the public to the greatest extent possible. Public hearings were advertised in the local newspaper, through letters sent to local community organization, in the Middletonian magazine publication and on the city's website.

The City conducted ten focus group sessions with stakeholders and representatives from community service organizations to solicit feedback. Stakeholders included representatives from educational institutions, nonprofit sector, business community and community residents. The City also published an article in the Middletonian magazine inviting the public to provide feedback and participate in the planning process. Feedback received from these opportunities informed the development of this plan. The City also made a community survey available to obtain additional public input.

The City invited community organizations to participate in the planning process by sharing their vision, initiatives and priority projects through the provision of a proposal process. Nine organizations submitted projects for consideration.

5. Summary of public comments

The City received significant input from local community organizations and stakeholders through the planning process. Comments were collected compiled from individual conversations, focus groups and public meetings and compiled through respective reports.

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

No additional comments were received during the 30-day public review period.

The Process

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	MIDDLETOWN	Department of Administrative Services

Table 1 – Responsible Agencies

Narrative

The Department of Administrative Services is the lead agency for the completion of the Consolidated Plan. The City contracts with Community Development Professionals, a professional consultancy firm, to administer the day-to-day operations of the federal funds administered by the department and to lead efforts to develop the Consolidated Plan. The Annual Action Plans identify the specific activities the City undertakes to accomplish its objectives and reach intended outcomes identified in the plan. The City partners with subrecipients and other city departments, including Department of Financial Services, Building Inspections, Code Enforcement, Parks and Recreation, Capital Improvement Program, and Planning and Zoning, to accomplish the activities outlined in the plan. The Department of Administrative Services works under the direction of City Council.

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PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

The City of Middletown is committed to addressing the community's priority needs in the most efficient and effective way possible. To that end the City partners with a variety of public and private agencies and organizations that enhance the work of the City in the areas of social service, homeless activities and programs, economic development, housing and healthcare.

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

The City actively pursues opportunity to coordinate with initiatives, organizations and providers that impact the City of Middletown and its residents. The City participates in the Butler County Housing and Homeless Coalition which is comprised of both housing providers and agencies involved in provision of service for households experiencing homelessness. A staff from Department of Administrative Services serves as an ex-officio member of the Board and attends monthly meetings of the board and monthly meetings of the general membership. Members of the coalition include cross-system representatives from housing, social services, behavioral health, and community action, including publicly-funded organizations that include Mental Health and Recovery Services Board, Butler Metropolitan Housing Authority, Butler County Community Development, YWCA, Serve City, and Hope House.

In addition, the City works with public health officials, social service agencies, business districts, educational institutions, including Middletown Public School and Miami University, to be keep apprised of needs and coordinate efforts to meet needs in the community.

For the development of this Consolidated Plan, the City worked through focus groups sessions, community conversations, and public hearings to engage with providers, identify needs and establish priorities.

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

The Balance of State Continuum of Care (BOSCO) is comprised of the 80 rural counties in Ohio, covering all non-entitlement communities in the state. Butler County is the largest of the counties included in BOS and has the BOSCO's two largest congregate shelters – Serve City which houses 52 people and Hope House which houses 40. Butler County Community Development is the grantee of HUD CoC funding for permanent supportive housing which houses 70 chronically homeless individuals and families. The Ohio Development Services Agency and the Coalition on Homelessness and Housing in Ohio (COHHIO) serve as the lead agencies for the BOSCO. To better facilitate local coordination and planning efforts, BOSCO established regional Continua of Care (CoC). These local CoCs address community-level planning, identify service gaps, and plan and prioritize new and renewed homeless assistance projects. Butler County is a member of Region 14 under BOSCO, which is comprised of Clermont, Warren and Butler Counties. Butler County also has a private 501c3 nonprofit, Butler County Housing and Homeless Coalition, which oversees initiatives and programs around homeless services within the county. The City is actively involved with this Coalition and its members.

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All HUD-funded providers report into the State of Ohio's Homeless Management Information System. The community uses this system to inform its efforts to understand the extent of homeless, identify needs and review impact of various homeless programs and services.

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

COHHIO has established priorities for the Balance of State and the performance standards by which all HUD-funded programs are measured. Every year, the U.S. Department of Housing and Urban Development (HUD) provides resources to communities around the country through its Continuum of Care Homeless Assistance Programs. ODSA and COHHIO coordinate the process and prepare the application for funding for the BOSCO. To this end, a regional board as well as BCHHC engage with individual nonprofit partners to outline a strategy for local services and programs.

BOSCO Advisory Board

The Advisory Board is the primary planning body for the BOSCO. Its members are responsible for making recommendations on policy decisions and the work of the Steering Committee. One person from Butler County serves on this Board. In addition, the Advisory Board reviews and approves the process for evaluation of projects and completion of the Continuum of Care application for HUD funding. Members include housing and homeless service providers, funders, and advocates from around the state. Final approval for all Advisory Committee decisions comes from the Office Chief, Office of Housing and Community Partnerships, ODSA and the Director for Community Development, ODSA.

BOSCO Steering Committee

The Steering Committee is responsible for leading and engaging in most of the work related to maintenance of the Continuum of Care and the completion and submission of the annual application for federal funding through HUD's Continuum of Care Homeless Assistance Programs. Committee members also develop the application process plan, review and score HUD applications submitted by BOSCO members, and engage in long-term CoC strategic planning. Members of the committee include staff of ODSA, COHHIO, and the Ohio Department of Mental Health (ODMH).

BOSCO Outcomes and Performance Committee

The Outcomes and Performance Committee is responsible for developing and implementing plans for the monitoring of BOSCO homeless programs, with an emphasis on outcomes. Committee members engage in the development of improvement plans with programs, and provide guidance to the Steering and Advisory Committees regarding renewal programs/outcomes for the CoC application process.

BOSCO HMIS Core Group

The HMIS Core Group coordinates statewide HMIS training and data collection for all BOSCO homeless providers receiving state/federal funding for emergency shelter, transitional housing, and permanent supportive housing (PSH), as well as organizations opting to participate in the BOSCO HMIS.

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

More than 2,000 individuals representing residents, businesses, community organizations and city personnel were involved in identifying community needs and prioritizing those needs for inclusion in this Consolidated Plan. The city integrated planning initiatives across the service area to ensure a comprehensive and consolidated process for the development of this five-year plan.

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The participation process for the Consolidated Plan included a series of community meetings; public notices; a 30-day public comment period; public hearings; a community survey, made available on the City's website; and consultation with nonprofits, City staff, elected officials, and housing providers. In addition, a number of plans have been integrated into the Consolidated Plan, all of which also sought community input to prioritize needs.

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

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Middletown Master Plan	City Planning Department	Master Plan Housing Element reflects housing priorities and objectives
What If Middletown	Miami University/CBI	Priority needs of community are consistent
Chamber of Commerce Focus Areas	Chamber of Commerce	Informed needs of workforce development and business community
City of Middletown Housing Policy	City of Middletown	Informed housing priorities of ConPlan
Danter Housing Study		Informed housing priorities of ConPlan
United Way bold goals	United Way of Greater Cincinnati	Informed needs and priorities of LMI households
BCHHC CoC Plan	Butler County Housing and Homeless Coalition	Informed housing and homeless priorities of ConPlan

Table 3 – Other local / regional / federal planning efforts

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

Narrative (optional):

As noted above, the City coordinates with a range of public entities, including the Planning, Health and Economic Development offices of Butler County and a number of State agencies in the development and execution of a range of programs and activities.

PR-15 Citizen Participation

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

The City considers the involvement of its low- and moderate-income residents to be essential to the development and implementation of its Five-Year Consolidated Plan and Annual Action Plans.

As noted in PR-10, Consultation, well publicized public hearings were held on two occasions – March 3, 2020 and April 20, 2020 at City Hall, One Donham Plaza, Middletown, Ohio. These sessions were part of a strategic effort to maximize participation by the public to the greatest extent possible. Public hearings were advertised in the local newspaper, through letters sent to local community organization, in the Middletonian magazine publication and on the city's website.

The City conducted ten focus group sessions with stakeholders and representatives from community service organizations to solicit feedback. Stakeholders included representatives from educational institutions, nonprofit sector, business community and community residents. The City also published an article in the Middletonian magazine inviting the public to provide feedback and participate in the planning process. Feedback received from these opportunities informed the development of this plan. The City also made a community survey available to obtain additional public input.

The City invited community organizations to participate in the planning process by sharing their vision, initiatives and priority projects through the provision of a proposal process. Nine organizations submitted projects for consideration.

The City ensures that public hearings are held at times and locations convenient to potential and actual beneficiaries and with accommodations for persons with disabilities. The city makes accommodations for those individuals in need of special assistance.

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The City has a number of priority needs which can be delineated into the two categories of (1) supports for low/moderate-income families and (2) community revitalization activities.

Many of Middletown's residents are economically challenged. The median household income in the City is \$39,116, which is 74% percent of the state average of \$52,407 and 62% of the national average of \$63,179. Activities and programs that tackle issues of poverty and help households and families become more income-stable are a critical and high priority need in the community.

Community revitalization efforts are directly tied to the economic challenges of the community. Many of the community's neighborhoods have aged without reinvestment. Housing has become challenging as older homes continue to deteriorate and many formerly owner-occupied dwellings have turned into rental properties, many with absentee landlords. The condition of the housing market in Middletown has resulted in significant drops in property value making the tax revenue decrease and adding to the overall economic challenges in the community. A concentrated effort to maximize federal investment of

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CDBG and HOME through concentrated neighborhood revitalization is critical to improving the City's overall health and well-being.

The City has commissioned and performed several significant data studies to inform its strategy moving forward. Distressed neighborhoods have been identified with a prioritization of place-driven strategies to improve overall conditions. Blight has been and continues to be strategically removed throughout the City, particularly in LMI census tracts. Code enforcement has worked to identify problem properties in LMI tracts and work with property owners to bring them up to code.

Other needs were identified through these data studies that impact all LMI target neighborhoods, namely 1) distressed and dilapidated housing, 2) poor street conditions, and 3) lack of amenities and attractive neighborhood appeal. In addition, city-wide there are needs with regard to economic conditions of the community, namely 1) lack of qualified workforce 2) limited youth activities, 3) insufficient social services including mental health and substance use treatment. These identified needs are included as priorities in the five-year consolidated plan. In addition, the City actively collaborates with other initiatives involving HUD partnerships through Butler Metropolitan Housing Authority, fair housing partner (Housing Opportunities Made Equal), and Continuum of Care for the homeless (Butler County Housing and Homeless Coalition). These partners address HUD priorities which include 1) addressing needs of homeless households, 2) ensuring there is appropriate housing for LMI households; and 3) fair housing activities. Activities related to all nine priorities delineated here are included in the Consolidated Plan.

The City has a strong commitment to address issues of generational poverty and strengthen the economic core of the community. This strategy connects public and private resources with partner efforts to improve the local economy. Through the five-year Consolidated Plan, the City will work specifically on efforts of 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. In addition, the City will focus efforts on strengthening social service needs in the community, especially in the areas of youth services and social services. All efforts are to meet needs in LMI areas and eliminate barriers to economic and community health.

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

According to 2018 American Community Survey (ACS), Middletown has the second highest number of single person households in Ohio at 56% -- 5 points above Ohio's percentage of 51%. Of the 19,776 households living in the city, 11,075 are single persons.

ACS reports 25.4% of Middletown residents live in poverty. Applying this percentage to the number of single person households, an estimated 2,800 households live at or below poverty and likely in need of housing assistance.

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

ACS figures indicate that there are 48,861 persons residing in Middletown, 17.2% of which, or 8,404, have a disability. This is slightly lower than 2010 data suggests but still 5 points higher than the national average. Figures broken down by age categories show that the percentages of persons with

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a disability are significantly higher than U.S. figures, in each of the categories. Persons with disability are often on fixed incomes and are far more likely to be in need of financial assistance including housing.

Domestic violence rates are difficult to ascertain as numbers are underreported and shelters are not obligated to report their data publicly. The only domestic violence shelter in the community at YWCA Hamilton reports they served more than 300 victims of domestic violence, stalking and sexual assault in 2019 and numbers are growing. Nearly 100% of these victims of violence are extremely low income and in need of housing assistance.

What are the most common housing problems?

The most common housing problem in Middletown is cost-burden, that is paying more than 30% of income toward occupancy. Limited financial resources prevent LMI households from meeting the threshold of paying 30% of income toward occupancy costs. 1,685 renter households with income at or below 30% AMI have a cost burden greater than 50 percent. 1,045 renter households with income at or below 50% of AMI have a cost burden greater than 30%. 1,290 owner-occupied households have a cost burden greater than 50 percent and 1,740 owner-occupied households have a cost burden greater than 30 percent.

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

There is a direct correlation between cost burden and household income. Households at or below 30% of AMI (very low-income) are most impacted by cost burden. In general, many of the units available for rent in Middletown are at or below fair market value; however, the extreme poverty of many of the households in the City creates a cost burden for these families. 44.7 percent of the renter-occupied households with a severe cost burden are extremely low-income. 46.4 percent of owner-occupied households with severe cost burden are elderly households at or below 30% AMI.

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

Butler County Success works in the schools to identify and assist families at imminent risk of homelessness. Emergency Money Fund is a local resource that works with Butler County Success to prevent homelessness. HCRP funding through ODSA also provides limited assistance for prevention and rapid rehousing to move homeless families into affordable and safe housing as quickly as possible.

The average homeless family in Butler County is a single, female-head-of household with 2 school-aged children. Most families who are homeless have significant barriers to housing stability resulting from unemployment or underemployment and lack of support system to fill in the gaps for childcare, unexpected expense and transportation needs. Wraparound services that include livable wage employment, affordable child care, affordable housing, transportation, access to healthcare, life skills training, and additional education and/or training, including GED programs, and English as a Second Language, are valuable, if not necessary, to lift people out of poverty and maintain housing stability. The

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City is working through this Consolidated Plan on creating impactful strategies with community partners like BCHHC and Community Building Institute to ensure these wraparound services exist and to minimize the number of families who enter the homeless system.

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

To the greatest extent possible, actual numbers for at-risk populations are provided.

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

Lack of habitable housing, especially for extremely low- and very low-income renter households, is a principal risk linked to housing instability in Middletown. Poor housing maintenance by absentee landlords contributes to this issue. Another issue is the aging housing among low income owner-occupied households. Funds to rehabilitate and/or correct code violations is a factor in maintaining habitability. The consolidated plan includes provisions to address both of these issues.

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

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

Introduction

HUD identifies four common concerns for housing units: (1) overcrowding, (2) lack of complete kitchen, (3) lack of complete plumbing, and (4) cost burden.

Discussion

Often there is a direct correlation between income and identified housing problems, i.e. the lower the income the higher percentage of having one or more of the identified housing issues. When reviewing housing problems among different ethnic and racial groups, Middletown's data does not indicate disparities among racial demographics. The Consolidated Plan outlines plans to address issues directly related to HUD-defined housing problems, specifically owner-occupied rehab and repair. In addition, the cost burden issue will be addressed through the provision of services directed at supports to help low-income families.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2) Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Discussion:

Housing cost burden does not show disparity among racial groups.

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

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

There is a higher percentage of African-Americans at or below 50% AMI than the number of African-Americans in the City of Middletown.

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

There are higher concentrations of racial and ethnic groups, specifically African-American/black and Hispanic in the following census tracts: Census Tracts 013000, 013100, and 014000.

NA-35 Public Housing – 91.205(b)

Introduction

Butler Metropolitan Housing Authority operates the majority of public housing in the City of Middletown and administers the Section 8 Housing Choice Voucher (HCV) Program. The City has a strong and cooperative working relationship with BMHA to address issues of housing and to focus on community issues such as on crime and code enforcement. Butler Metropolitan Housing Authority operates with a board appointed by the Butler County Commissioners. A small number of vouchers in Middletown are administered by Warren County Metropolitan Housing Authority.

Butler Metropolitan Housing Authority has a total of 594 units of public housing in Middletown. Of that number there are 17 handicap-accessible units. More than 90 percent of these units are in the 1, 2 and 3-bedroom range with a significant lack of studio/efficiency units. The Warren Metropolitan Housing Authority manages the Brookview Apartments, a complex of one-, two- and three-bedroom units in Middletown.

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

434 disabled families are living in public housing in Middletown and 1,464 families requesting accessibility features.

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

The needs of residents of public housing are consistent with the overall needs of LMI families in Middletown. There are high numbers of public housing residents that need access to wraparound services necessary to pull them out of poverty. The City's emphasis on workforce development and providing social services that will enable families to become economically independent and stable will be made available to residents of public housing.

A second issue is continuing to ensure that those needing accessible units are able to access those units. Particularly with Housing Choice Vouchers, the City's partnerships with People Working Cooperatively and SELF may be able to assist HCV recipients to ensure ramps and accessibility features are provided.

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

These needs of BMHA clients are similar to other LMI households in the community. The City will work with BMHA to ensure access to services provided through the City's CDBG resources are available to these families and households.

Needs Assessment – 91.205(c)

Introduction:

Ensuring the needs of families and individuals experiencing homelessness are addressed is a high priority for the City. The City has strong involvement and cooperative relationships with providers in the community that address concerns of homelessness.

The City has an ex-officio seat on the board of the Butler County Housing and Homeless Coalition. This ensures the City remains abreast of concerns and challenges in the community, and specifically those concerns the City can help meet. More than 30 partner agencies are involved in the Coalition to meet the needs of families across the continuum -- from prevention through housing stability. Members of the coalition provide food, mental health services, housing, case management, substance use treatment and employment services.

Less than 20 unsheltered persons were identified during the most recent point in time count in Middletown. This number is largely considered to underrepresent the numbers in the community. There are two year-round homeless shelters in Middletown. Center of Hope houses up to 25 families with its 40 beds. Hope House (for men) houses up to 40 individuals. Occupancy remains nearly full. SHALOM is a seasonal shelter that averages 20 people per night during the winter months. The City of Middletown works through the Butler County Housing and Homeless Coalition to provide outreach and appropriate social services to assist the homeless.

Butler County administers 70 Permanent Supportive Housing Vouchers, about half of whom reside in Middletown. Hope House also recently completed a new permanent supportive housing project that can house up to 25 additional people.

The three factors that most contribute to homelessness include lack of economic opportunity, untreated mental health and substance use. Other factors monitored through HUD's point in time count include domestic violence and veterans.

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

Butler County Success works with families at risk or experiencing homelessness through the school districts. They estimate the need to be close to 1200 families across Middletown. The point in time count shows a much smaller need in the community. Center of Hope houses up to 25 families and ably serves the need in the community. Family Promise works across the county and is available to Middletown families as well. They have the capacity to serve up to 5 families.

Veterans are approximately 10% of the sheltered homeless in the community. The Veterans Services Commission is part of the Butler County Housing and Homeless Coalition and serves the needs of veterans including connecting them with Butler County Veterans Services Commission and Veterans Administration and other resources available to them throughout the region.

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

There is no disparity among racial or ethnic lines with regard to homeless residents. The demographics of homeless individuals and families are consistent with demographics of the general population across the county.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The recent point in time (PIT) count conducted on January 22, 2019, is reflected in the table below:

	PIT Number	Current Inventory	Unmet Need/Gap*
Homeless Individuals	306	366 (beds)	n/a
Homeless Households	223	284 (units)	n/a
TOTAL	306	386	n/a

While the annual point in time and inventory assessment seem to indicate Butler County has a sufficient number of beds and units for individuals and families experiencing homelessness, the process by which data is gathered for this HUD-mandated annual check point does not accurately represent the extent of the homelessness issue.

Households who do not meet HUD's definition of homeless including doubled up families and "couch surfers" are impacting the continuum of care and seeking services from providers but are not represented in the point-in-time count. Data indicates that greater numbers of homeless are incarcerated in the winter as well as staying with friends and families to avoid the elements. Individuals represented in this point-in-time count are limited to individuals and families in the shelter system on the specific date of the count and/or those found unsheltered in the county. Some effort is made to visit food pantries and meal centers during the count to capture anyone else who might need HUD's definition of homeless, but these numbers are generally limited.

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

Introduction:

Certain population groups require supportive services and/or supportive housing, either on a permanent basis, or on a temporary basis. Many special needs populations are very low-income households (below 50% of Median Family Income) because they are not able to work or can only work on a part-time basis. Special population groups include the elderly and frail elderly, the physically and developmentally disabled, severely mentally ill persons, and those with substance abuse issues.

Many disabled individuals rely on Supplemental Security Income (SSI) for financial support. SSI provides income support to persons 65 years and over, the blind, and also the disabled. Since many disabled persons have limited incomes, finding affordable and accessible housing is often a serious challenge. Even when new affordable rental housing is developed, the rental rates for the housing units are often too high for many disabled persons.

In addition, these persons often require various types of special assistance, program activities to enhance their quality of life, and respite care for their caregivers. Support for municipal programs as well as assistance to not-for-profit organizations is necessary for the implementation of these types of activities.

HUD has identified a number of special needs populations. However, detailed information on some special needs populations is often not available from census or HUD data sources. The City has used information from reliable sources or calculations from entities such as ARC (for the developmentally disabled), the National Institutes of Mental Health, or the National Institute of Alcohol and Alcohol Abuse to estimate the numbers of persons in those categories. Where possible, figures from reliable local sources are used to support these analyses.

While the City's resources alone are not sufficient to address the needs of all these groups, the City is committed to continue its work with other jurisdictions to support efforts to provide needed resources.

Describe the characteristics of special needs populations in your community. What are the housing and supportive service needs of these populations and how are these needs determined?

Discussion:

The Elderly and Frail Elderly

The elderly, 65 and over, constituted 15.2 percent of the total population in City of Middletown according to 2018 ACS, and there are an estimated 3,637 frail elderly (75 and older) in Middletown.

33% of seniors living in Middletown live alone. 6% of Middletown senior households have an annual income of less than \$10k and 28% less than \$20k. 19% of Middletown, OH residents 60 and over received food stamps in the last year. There are 1,033 working seniors in Middletown and 22% of the seniors in Middletown are veterans. The needs of the elderly vary greatly. Many, especially in very low-income households, face housing difficulties based upon their particular housing needs (size of units, and types of fixtures and amenities), and many are cost burdened. Middletown has a robust senior center (Community Connections) that offers strong services to the elderly in the community.

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Persons with Disabilities

The 2018 ACS data indicates that 17.2 percent of the City's population - 8,404 persons have a disability. This percentage is well above the national figure of 12.1 percent.

The Developmentally Disabled

The Association for Retarded Citizens (ARC) has a strong presence in Butler County. They indicate that approximately 2.5% of the population would meet the definition of developmentally disabled. By this calculation, there are an estimated 1,200 developmentally disabled persons in Middletown.

Most DD professionals champion independent living for DD residents, preferring developmentally disabled residents to be integrated into main stream housing in the community. There are several other supportive housing options available as well through private practitioners such as ECI including supervised apartments, supported living, skilled development homes, and family care homes. Safe Haven Farms is another option for developmentally disabled adults that desire to live in a congregate setting.

The Physically Disabled

The number of persons under the age of 18 with disabilities is 1,015, while the number of persons aged 18 to 64 with disabilities is 5,453, or 18.6 percent of the persons in that age group. The number of persons 65 and over with disabilities is 2,847 or 39.7 percent of that age group. These figures, based upon the Census Bureau definition of disability, include a wide range of disabilities and a precise figure for persons with physical disabilities is difficult to determine.

Persons with physical disabilities may require assistance with daily living, and additional requirements for their housing including, for example, special types of kitchen and bathroom fixtures and special fire alarms.

Persons with Alcohol and Drug Dependencies

It is difficult to obtain information about the exact number of persons with drug and alcohol dependencies. All data indicates that the Opioid epidemic has significantly and negatively impacted the City of Middletown and the county as a whole. The Ohio Addiction Recovery Center reports that there were a total of 493 overdoses in Middletown in 2018 linked to heroin which resulted in 53 deaths. In 2017 there were reported 966 heroin overdoses in 2017, 77 of which were fatal.

The Center on Addiction, a national advocacy center, reports 1 in 7 adults has a substance use disorder. In Middletown that would indicate approximately 5,300 adults have a substance use issue.

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

The US Center for Disease Control estimates that 0.3 percent of the US population currently lives with HIV/AIDS, and that 15.8 percent of those infected are not aware of their infection. Applying the 0.3 percent figure to Middletown would indicate that 146 persons in Middletown are affected.

Figures from the Ohio Department of Health for 2018 indicate that there were 236 current HIV positive cases in Butler County. Figures specifically for Middletown are not available.

Persons with HIV/AIDS face a number of housing barriers, including discrimination, housing availability,

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transportation and housing affordability. The co-incidence of other special needs problems with HIV/AIDS can make some individuals even more challenging to house. Caracole, an organization based in Hamilton County, serves the Butler County community and provides special consideration for housing needs for those affected by HIV/AIDS.

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

Describe the jurisdiction's need for Public Facilities:

The Department of Public Works and Utilities and the City Administration are aware of the need for and importance of maintaining, repairing and upgrading the City's public facilities and infrastructure to preserve the community's general well-being. Public facilities and infrastructure are critical to maintain and preserve commercial and residential areas and attract new development.

The City will prioritize public infrastructure in its Oakland neighborhood initially and then work within other LMI areas as funding permits. The City recognizes its role to maintain an appropriate standard for roads, sidewalks, sewers, bridges, parks and public buildings.

How were these needs determined?

Community development needs and priorities were identified in the course of preparing this Consolidated Plan through the input of community leaders, citizen participation, and requests and ideas from a wide range of service providers and public agencies. More than five separate planning initiatives informed this plan in addition to specific activities for development of the Consolidated Plan. Input was encouraged through series of meetings, focus groups and public hearings described in the public participation section of this Plan. The Department of Administrative Services worked with City Council and City Departments to identify a plan for use of funds and prioritize activities set forth in this plan.

The Department of Administrative Services works directly with various County and State agencies that often raise issues and concerns or make requests about improvements or conditions in the low/mod neighborhoods. The funding and project selection process reflects the input and weighing of needs and requests in light of the overall objective and availability of funds.

Describe the jurisdiction's need for Public Improvements:

The need for public improvement is larger than what can be accomplished through CDBG funds. The City has a comprehensive master plan that complements the Consolidated Plan to ensure there is specific, intentional improvement of public infrastructure. The Consolidated Plan outlines a strategy for improving public facilities that have been prioritized in LMI communities. Additional efforts of the City include a focus on park and recreation facilities, street resurfacing and sidewalks.

How were these needs determined?

The City has undertaken a number of initiatives over the past few years. Needs that were identified through community meetings, surveys, focus groups and public hearings have been incorporated into this process for developing the Consolidated Plan.

Describe the jurisdiction's need for Public Services:

There are three areas that have been identified as priority needs under the Public Service Category: workforce development, youth centers and social service activities. The City strives to improve life for low- and moderate-income residents through its allocation of CDBG funds. In addition the City partners

with nonprofits and community organizations to support their work for the benefit of Middletown residents.

Middletown has more than 25 nonprofits who provide direct service to the City of Middletown residents. Nonprofits are involved in quality of life activities such as the arts and recreation. Others are involved in filling basic needs of food, clothing and shelter. The strong nonprofit sector ably meets the needs of the community but there are increasing demands for limited resources. The City continues to seek ways in which we can support the work of the nonprofit sector and come alongside their efforts to improve the lives of Middletown's residents.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

In 2017 Middletown commissioned a Housing Study to delineate the condition of housing across the City. Results from this comprehensive and thorough study have been integrated into this consolidated plan as appropriate. Middletown has an abundance of housing for first-time homebuyers. Many of these units are in good condition and there is a healthy real estate market for first time homebuyers. There is also a fair number of housing units that have fallen into disrepair. These housing units are often owned by LMI households, many of whom are elderly residents or second-generation homeowners who inherited the homes from the original homeowners. Lack of financial means has often led to poor compliance with building codes and homes falling into disrepair. In addition, vacant and abandoned buildings are seen in many neighborhoods. The City has absentee property owners who have left properties vacant and let them deteriorate. Many of the City's low- income renters are forced to pay more for the limited supply of rental units, a substantial portion of which are older and sometimes in deteriorating condition.

Middletown has lost significant industry over the last two decades and many livable wage jobs have moved out of the city. Income levels for jobs that remain have been stagnant over the past decade, so that even those working in "good" jobs are losing ground financially. The rent figures continue to increase as the population grows and the supply of units remains stable. At the same time, demands for increased down payment and stricter lending criteria keep many households from purchasing homes, which also increases the pressure on the rental market.

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

Introduction

A basic premise of all housing markets is that there should be a spectrum of housing choices and opportunities for residents. This concept recognizes that housing choice and needs differ in most communities because of factors such as employment mix, household income, the age of the population, proximity to employment, and personal preference. Local housing markets and labor markets are linked to one another, and local housing markets provide choices and opportunities for current and future workers.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	14,847	65%
1-unit, attached structure	1,827	4%
2-4 units	2,515	11%
5-19 units	2,512	11%
20 or more units	685	3%
Mobile Home, boat, RV, van, etc	456	2%
Total	22,842	100%

Data Source: 2018 ACS

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

The City has been consistent in its housing objectives over the years: 1) provide property rehabilitation assistance, 2) provide opportunities for additional ownership, 3) to demolish abandoned, unsafe, and deteriorate structures and 4) expand the supply of affordable housing **in good condition** that meets the needs of the City's diverse households, family structures, and income levels. This includes 4,280 extremely low-income and 3,110 very low-income households in the City as well as the 1,464 HCV and the City's public housing households.

For purposes of the Consolidated Plan moving forward, the City will continue its commitment to increase the condition of homes available and provide opportunity for new homeownership. The City is looking to focus many of its housing efforts on specific LMI neighborhoods, starting with Oakland.

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

The City does not anticipate losing any affordable housing units.

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

Yes. The City is working to provide opportunities for households who increase their economic stability to have additional housing options in the community.

Describe the need for specific types of housing:

Discussion

The most pressing housing need is not related to the number or types of housing units. The need is for better maintained affordable rental units and the maintenance and rehabilitation of owner-occupied units.

The Area Median Family Income data from HUD shows that almost sixty percent (59.7%) of Middletown households are in the three lowest HUD income categories, and almost one-third of that number are in the extremely low-income category. This amounts to over 7,000 households at or very close to the poverty level.

The HUD data show that the greatest identified housing problem in Middletown is cost burden. The problem is most severe among extremely low-income renters, where there are 2,095 households with a cost burden or severe cost burden.

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

Introduction

A basic premise of a strong housing market is to ensure that there is a spectrum of housing choice and opportunity for residents. This housing choice and resident needs will vary because of employment mix, household incomes, age of the population, and personal preference. However, housing markets and labor markets are inextricably linked and the level of affordable housing demand is largely a function of job growth and retention. Employment growth in Middletown has remained steady and even slightly improved over the last few years. Workforce development and reintegrating people into the labor force is a significant need. Middletown is working to retain and expand existing firms, and spur economic growth from start-ups, spin-offs, and relocations. Concurrent with stabilizing and growing the local economy, the City is focusing on strengthening its housing market and expanding housing options across the income continuum.

2018 HUD's Fair Market Rent (FMR) for a two-bedroom apartment in Butler County is \$845. In order to afford this level of rent and utilities – without being cost-burdened, that is paying more than 30% of income on housing – a household must earn \$2,816 monthly or \$33,800 annually -- \$16.25/hour.

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The median income in Middletown in 2017 was \$39,116 but LMI households, defined as being at or below 80% of AMI, are not earning enough to cover the costs without being cost burdened. Minimum wage in Ohio is \$8.55/hr. To meet FMR, a head of household working minimum wage would need to work 76 hours/week to afford this unit. The result of cost-burdened households is families living in substandard structures, “doubling up” with other families and/or working more than one job just to afford fair market rent.

Table 31 – Monthly Rent

Is there sufficient housing for households at all income levels?

There are a sufficient number of affordable housing units and subsidized units in Middletown, but cost burden for LMI families is a challenge. The City is working through this Consolidated Plan to increase employability for LMI households.

Where the City faces housing sufficiency is in the mid-size homes. The Danter Housing Study confirms that starter homes are available and high-end dwellings are available but mid-range 3-4 bedroom homes are nearly non-existent in the City. The City is working with developers to ensure there is a strong balance of sufficient dwellings along the entire income continuum.

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

The City expects affordability to remain constant over the next five years. Middletown as a whole is an affordable community with sufficient housing choice at lower income levels. The City’s efforts through this Consolidated Plan with regard to affordability is to increase activities around workforce development, increase income of families and decrease the number of households that are cost-burdened.

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

The average rent in Middletown, Ohio for a 2-bedroom unit is \$833/ month. This is just below the HUD Fair Market Rent for a two-bedroom unit which is \$845. HOME low rent and high rent limits also equal \$845. The City's strategy to maintain good, quality affordable units is critical to being able to appropriately house households and families needing rents at or below fair market value.

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

Introduction

The condition of many of the single-family units which have been converted from owner-occupied to rental housing is poor. As shown below in Table 33 over two-thirds of rental units were constructed before 1980 and nearly thirty percent of renter units were constructed before 1950. Many of these rentals are owned by absentee landlords. The City has been consistent in its efforts to enforce housing code violations.

Over 70 percent of owner-occupied units were constructed prior to 1980 and one-third of owner-occupied units were constructed before 1950. In the last couple of years the City has sought out developers to begin filling in the housing gap and undertake construction in strategic neighborhoods. Oakland has been identified by the City as the priority for development efforts – both new construction housing as well as rehab and neighborhood beautification.

Definitions

Substandard condition refers to a dwelling unit that does not meet acceptable conditions per the City's Building Code and is structurally in need of significant renovation or rehabilitation, or in worst cases, demolition/condemnation. Substandard condition but suitable for rehabilitation means a structure is in poor condition and may have one or more housing code violations, however it is financially and physically feasible to rehabilitate it and return it to a condition that satisfies City code. This definition does not include units that require only minor cosmetic work or maintenance work.

HUD has identified four housing problems, which are 1) overcrowding, 2) lacks complete kitchen, 3) lacks complete plumbing, or 4) cost burden. Overcrowding means that there is more than one person per room living in a housing unit. The lack of complete kitchen or lack of plumbing is self-apparent.

The U.S. Census estimates the total number of substandard units in a geographic area by calculating both owner- and renter-occupied units 1) lacking complete plumbing facilities, 2) lacking complete kitchen facilities, and 3) 1.01 or more persons per room (extent of housing overcrowding). The U.S. Census defines "complete plumbing facilities" to include: (1) hot and cold piped water; (2) a flush toilet; and (3) a bathtub or shower. All three facilities must be located in the housing unit.

Overcrowding is defined by HUD as 1.01 to 1.50 persons per room, while severe overcrowding is 1.51 or more persons per room. HUD data on the numbers of persons residing in housing units provides some insight into the potential for homelessness.

Another factor to consider when discussing the condition of housing stock is the age of the housing stock. For the purposes of this analysis, the City of Middletown defines any rental property located in a low income neighborhood older than 30 years as "older housing stock".

Need for Owner and Rental Rehabilitation

The City's aging housing stock requires significant maintenance and often upgrades and renovation for outdated plumbing and electrical work to accommodate modern equipment, fixtures, and living needs. Unfortunately, many buildings comprising the housing stock have experienced a lack of maintenance and disinvestment, resulting in substandard living conditions or outright blight. The City's percentage of vacant structures is three percent higher than the United States average, and the ACS figure of 3,554 vacant and deteriorating structures creates a negative impression, depresses property values, and reduces the quality of life in many neighborhoods, especially low- and moderate-income neighborhoods.

Table 32 shows that 31 percent of owner occupied and 53 percent of renter occupied units have at least one of the four housing problems identified in the Census. As noted in the Needs Assessment, the majority of these units are cost burdened or severely cost burdened. However, as noted in public meetings and the focus groups sessions, upkeep and maintenance are key issues especially for elderly homeowners living on a fixed income, and for many renters living in older buildings with absentee landlords.

There is a significant need for both owner and rental housing rehabilitation in the City of Middletown, as evidenced by participants in past rehabilitation programs and feedback received during stakeholder discussions during the consultation/participation phase of preparing this document.

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

As shown above, 33.0 percent of the City's owner housing stock and 28.0 percent of rental units were constructed before 1950, and presumed to contain lead-based paint. In total, slightly over 80 percent of owner and renter occupied units were built before the use of lead-based paint was stopped in 1978. The City's population is 59.8% extremely low-, very low-, and low-income households, who have the difficult task of locating safe and affordable rental housing. Poverty and parental supervision are risk factors in determining the prevalence of lead poisoning.

We estimate that at least 60% of the City's existing housing stock is likely to have lead-based paint hazards.

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

Introduction

Butler Metropolitan Housing Authority operates the majority of public housing in the City of Middletown and administers the Section 8 Housing Choice Voucher (HCV) Program. The City has a strong and cooperative working relationship with BMHA to address issues of housing and to focus on community issues such as on crime and code enforcement. Butler Metropolitan Housing Authority operates with a board appointed by the Butler County Commissioners. A small number of vouchers in Middletown are administered by Warren County Metropolitan Housing Authority.

Butler Metropolitan Housing Authority has a total of 594 units of public housing in Middletown. Of that number there are 17 handicap-accessible units. More than 90 percent of these units are in the 1, 2 and 3-bedroom range with a significant lack of studio/efficiency units. The Warren Metropolitan Housing Authority manages the Brookview Apartments, a complex of one-, two- and three-bedroom units in Middletown.

Describe the supply of public housing developments:

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

The Butler County Metropolitan Housing Authority has a total of 594 units of public housing in Middletown. Of that number there are 17 handicap-accessible units. More than 90 percent of these units are in the 1, 2 and 3-bedroom range with a significant lack of studio/efficiency units. 108 units are scattered sites; the balance are in structures ranging from 12 to 125 units.

The City also has 719 Low Income Housing Tax Credit units available to assist in affordability. A number of the buildings are older and in need of upgrades and renovations.

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

BMHA's Middletown units are in good to fair condition. BMHA has a persistent and consistent plan to rehabilitate its units to prevent them falling into disrepair.

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

BMHA and WMHA have individual plans for serving the needs of their residents. They are connected to the social service community in the county as well as operate independent programs to best serve their residents. Generally, the Butler Metropolitan Housing Authority and the Warren Metropolitan Housing Authority public housing needs, including resident services, do not solicit or request funding support from the City or CDBG but rather work to leverage funding through funding sources available to HA's. Both Authorities administer a Family Self-Sufficiency program through their respective Section 8 programs.

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

Introduction

The City in coordination with Continuum of Care provides a range of housing assistance for the homeless.

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

The City of Middletown addresses most of its core needs for homeless and housing related services through a partnership with the Butler County Housing and Homeless Coalition. The Coalition has more than 30 active members working collectively to address needs of persons experiencing homelessness as well as households at risk of becoming homeless. The City works closely with these providers to ensure Middletown's residents have access to mainstream services.

Organization	Services Provided
City of Hamilton	Municipality; Community Planning and Funding Support for Homeless Services; Law Enforcement
City of Middletown	Municipality; Community Planning and Funding Support for Homeless Services; Law Enforcement
Butler County	Community Planning; PSH (Shelter + Care) Administration; Law Enforcement
BMHA	Public housing, housing choice vouchers
Community Development Professionals	Permanent Supportive Housing (Shelter Plus Care)
Butler Behavioral Health	Mental health; case management; housing
Community Behavioral Health	Mental health; case management; housing
Sojourner Recovery Services	Substance abuse treatment – inpatient; outpatient
Genesis	Substance abuse treatment – inpatient; outpatient
Transitional Living/PATH	Mental health, street outreach, PIT
Hope House Rescue Mission	Emergency shelter
Serve City	Emergency shelter

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YWCA	Transitional shelter for women
VA	VA services and referral
Veterans Services Commission	VA services and referral
Butler County Success	Homeless liaison for schools
Oxford Family Resource Center	Emergency housing and referrals
The Dream Project	Developing new transitional housing
SHALOM	Emergency shelter during winter months
Family Promise	Emergency shelter for families
Access Counseling Services	Outreach, Mental health: case management, housing, therapy
Emergency Money Fund	One- time financial assistance to prevent/end homelessness
Women Helping Women	Domestic violence, crisis intervention
Freedom House	Faith community, supportive services
Lighthouse Church	Faith community, supportive services
SHALOM	Seasonal emergency shelter, supportive services
WMHA	HCRP funding
SELF	Support services to stabilize individuals and families
Ohio Means Jobs	Job referrals; education to stabilize individuals and families

The City of Middletown has supplemented these efforts to the extent possible in light of the many needs.

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

The City is home to three homeless shelters - Hope House Rescue Mission serves up to 40 men; Center of Hope provides shelter for up to 25 families with children; and SHALOM is a seasonal shelter

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that can serve up to persons during the winter months. The shelters work to connect clients with available services in the community and move them out of homelessness as quickly as possible. All three shelters are members of the Butler County Housing and Homeless Coalition. Butler County is also part of Region 14 under the Ohio Development Services Agency's Balance of State Continuum of Care. This system prioritizes chronically homeless individuals and subscribes to a housing first approach. All providers also report to the state on housing outcomes.

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

Introduction

Non-homeless special needs such as senior services, mental services, services for persons with HIV/AIDS, and Alcohol and Drug treatment are all extremely important to the City of Middletown. The City works in partnership with local providers such as Primary Health Solutions, Butler County Development Disabilities, Community Connections and the Butler County Mental Health and Recovery Services Board to ensure residents have access to services and programs they need.

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

The numbers of and supportive needs of these groups was described above in Section NA-45. The City will support and encourage social and public service providers to seek funding assistance from Federal, State and private sector resource to fund individual programs as appropriate.

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

Middletown works closely with Butler County and its permanent supportive housing program. Hope House also recently constructed a new facility which offers ad 25 new permanent supportive housing units. BCHHC monitors the local system of care for those experiencing homelessness and works to ensure there is a solid system for appropriate supportive housing. In addition, several other public systems have policy that ensures persons are appropriately discharged:

Foster Care:

Each Public Children's Service Agency (PCSA) shall provide appropriate services and support to former foster care recipients. The services and supports are to complement the young adult's own efforts and shall be available until the young adult's twenty-first birthday. Independent living services that are available to young adults aged eighteen to twenty-one include: daily living skills, assistance in obtaining a diploma or GED, entering post-secondary education or training, career exploration, vocational training, job placement and retention, preventative health activities, financial, housing, employment, education and self-esteem counseling, drug and alcohol abuse prevention and treatment. An agency may use up to 30% of its federal allocation for room and board for the emancipated youth up to age 21, which includes assistance with rent, deposit, utilities, or utility deposits. Each county's protocol may be different as

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Ohio is a state supervised, county administered state. If a child is 16 years or older and is likely to remain in care the agency must have a written independent living plan to achieve self-sufficiency developed within thirty days of the completion of an assessment. The plan should be based upon the assessment and include input from the youth, the youth's case manager, the caregiver, and significant others in the youth's life. The independent living plan should be reviewed at least every ninety days thereafter until the agency's custody is terminated.

Health Care:

The Ohio General Assembly has enacted laws governing the transfer and discharge of residents in nursing homes (NHs) and residential care facilities (RCFs) [Ohio Revised Code (ORC) section 3721.16], adult care facilities (ACFs) [ORC section 3722.14], and community alternative homes (CAH)[ORC section 3724.10]. As the licensing agency for these facilities, the Department of Health promulgated Chapter 3701-16 of the Ohio Administrative Code (OAC) that further expounds on the transfer and discharge rights of NH and RCF residents and OAC rules 3701-20-24 (ACF) and 3701-16, 23 (CAH). The Department ensures that these provider types follow the appropriate Department of Health promulgated Chapter 3701-16 of the Ohio Administrative Code (OAC) that further expounds on the transfer and discharge rights of NH and RCF residents and OAC rules 3701-20- 24 (ACF) and 3701-16, 23 (CAH). The Department ensures that these provider types follow the appropriate regulations regarding transfer, discharge, or both, by reviewing documentation that the facility has initiated discharge planning and that alternatives have been explored and exhausted prior to discharge. Although Ohio does not license hospitals, ODH as the State Survey Agency for Medicare, surveys hospitals for compliance with Medicare certification regulations related to resident discharge rights 42 CFR 482.13 and discharge planning, 42 CFR 482.43, which establish hearing rights for premature discharge and requirements for planning for patients' needs after discharge.

Mental Health:

It is the policy of Ohio Department of Mental Health that homeless shelters are not appropriate living arrangements for persons with mental illness. Patients being discharged from ODMH Behavioral Health Organizations (BHO)/Hospitals are not to be discharged to a shelter or to the street. Community Support Network (CSN) programs are required to have appropriately approved emergency housing plans in place in the event their clients undergo unexpected residential change. These entities, in conjunction with the responsible or contracting Board or agency, must exhaust all reasonable efforts to locate suitable housing options for patients being discharged. Patients in ODMH BHO shall not be discharged to homeless shelters and clients in an ODMH CSN program shall not be removed or relocated from community housing options to homeless shelters unless the responsible board or contract agency has been involved in the decision making process and it is the expressed wish of the affected person and other placement options have been offered to the affected person and refused. When a discharge or relocation to a homeless shelter occurs under these guidelines, the reasons shall be thoroughly documented in the persons chart and reviewed via the BHO's quality improvement process. Persons may not be discharged or relocated to homeless shelters for the convenience of staff, as a punitive measure, or for expediency. ODMH BHO policies shall be consistent with this directive.

Corrections

Ohio Department of Rehabilitation and Correction policy is to not discharge persons to the streets or a shelter. Reentry planning addresses an offender's needs, linkages to the community and appropriate supervision activities subsequent to release. Prior to release, case managers assist in determining potential housing options for release; review with the offender the need for appropriate documents and assist in acquiring those documents; and make appropriate community linkages for offenders with substance abuse, mental health diagnoses and medical concerns. Case managers finalize housing and transportation plans and secure transportation, if needed. All plans for final release are documented in the offender's reentry plan. Offenders are offered release preparation classes to address job search and retention, resume writing, interviewing skills, community resources, and substance abuse, mental health and medical issues. The Ohio Department of Youth Services' (ODYS) policy is to return all youth to their home, if possible. Alternatives include placement with extended family, foster care, independent living, etc. Transition/release planning for all youth begins within 60 days of admission to an ODYS facility and continues for the duration of commitment. For those youth who are committed to ODYS until a date equal to or near their 21st birthday, transition/release planning requires a formal case staffing process to begin one year prior to release.

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

The City's plan includes funding support to SELF and PWC for housing repair; Legal Aid for legal services and HOME for fair housing services.

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Through city protocol and tools such as zoning ordinances, subdivision controls, permit systems, and housing codes and standards, the City strives to strike a balance between ensuring the health, safety, and quality of life for its residents and minimizing barriers for affordable housing. The City, in partnership with Butler County, prepares an analysis of impediments to fair housing choice and follows the recommendations outlined in the AI.

A strong impediment to housing choice is quality of affordable housing. Many of the smaller, affordable homes have deteriorated due to lack of maintenance and upkeep. For owner occupied homes, many of the homeowners are LMI and lack the ability to pay for proper upkeep. For homes that have turned into rental properties, many of the landlords live out of town and do not invest sufficiently to maintain the quality of the rental unit.

Many housing units pre-date 1978 and presumably contain lead-based paint and asbestos, both of which must be remediated where extreme rehabilitation is necessary in order to bring the structure up to code. This makes housing redevelopment expensive and out of the reach of low-income households.

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

Introduction

The City has many non-housing community development assets. The City has its own existing water and sewer systems and a robust public works department. The City is located on the river and has strong quality of life activities and parks that take advantage of this natural asset. The City has a strong transportation system with linkages to a larger, county-wide system. The City boasts a strong senior center and many social services providers to serve non-housing needs of vulnerable residents. The City has active business districts and has experienced a re-emergence of locally owned businesses in its downtown corridor. The City has re-invented itself as an arts community and has a vibrant arts community, including local nonprofits and several artist-led businesses that add to the local culture.

Economic development continues to be a priority for the City and is key to the growth and revitalization of Middletown. As noted in the commissioned studies that, in part, inform the Consolidated Plan, livable wage employment is key to economic stability both for individual households and the City as a whole. One of the priorities of this Consolidated Plan is readying the workforce to tap into available jobs. Education and job training are crucial to having and keeping a competitive workforce. The City will continue to work through the local business community and economic development practitioners to steward resources and invest in activities and infrastructure that will make Middletown competitive in attracting new businesses.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	29	16	0	0	0
Arts, Entertainment, Accommodations	1,968	1,982	12	11	-2
Construction	630	578	4	3	-1
Education and Health Care Services	2,956	4,104	18	22	4
Finance, Insurance, and Real Estate	917	949	6	5	-1
Information	254	59	2	0	-1
Manufacturing	2,936	4,854	18	26	8
Other Services	547	473	3	3	-1

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Professional, Scientific, Management Services	1,143	516	7	3	-4
Public Administration	0	0	0	0	0
Retail Trade	2,219	3,342	14	18	4

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

Education and health care is the category with the largest employees followed by manufacturing and retail employment. Arts, Entertainment and Accommodations is the fourth largest sector.

Describe the workforce and infrastructure needs of the business community:

The City has a vibrant business community and strong systemic infrastructure. The Chamber and Small Business Development Center work closely with the local business districts and the City's economic development department to meet the needs of local businesses. Infrastructure issues are a low priority for the use of CDBG funds.

The greatest need for the City in terms of economic development is workforce development. The City has experienced an increase in the number of livable wage jobs in the community but business owners and employers express difficulty in filling these positions. This Consolidated Plan includes a priority to prepare the local workforce and provide soft skills, education and other training needed to ready residents to fill these employment needs.

The earnings figures in Table 45 show what is commonly known - that the higher one's level of education, the greater one's earnings. Indeed, the Median Income figure for those with less than a high school diploma is below the current poverty level. Unfortunately, in Middletown the educational attainment level of many residents is low as shown in Table 44 - almost 4,000 persons in the working age cohorts (18 - 65) do not have a high school diploma and only 2,356 persons in these cohorts have a Bachelor's degree.

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

There are no specific major changes that are anticipated to have an economic impact. Over the last five years, the City has commissioned economic development and community development studies and worked to strategically improve the economic conditions in the City. Industrial and commercial space in Middletown is plentiful, varied, and affordable relative to other locations. The City is working to rebrand its business corridors and overall image and continue efforts to attract new businesses to the marketplace. The Downtown Revitalization program and the Renaissance East projects both focus efforts on business development. The City plans to continue its partnership with Community Building Institute as well as Miami University and Ohio Means Jobs on issues of workforce development.

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

Available employment outpaces the available workforce in the community. This challenge provides opportunity for the City to expand its workforce development efforts and ready its LMI residents to fill these available jobs. Many current LMI households are unemployed or underemployed. Available employment combined with strategic efforts to train or retrain workers will result in a stronger workforce and increased income among resident households.

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

Butler County Workforce One offers an expansive business service catalog, assisting employers with recruitment expertise, occupational skills training, employee wage reimbursement through On-the-Job Training, layoff aversion and outplacement assistance services. Ohio Means Jobs, the employment services arm of Ohio Department of Jobs and Family Services provides its resources through a partnership with Community Building Institute. For this Consolidated Plan, the City is partnering with CBI to directly and strategically ready the local workforce. In addition, Cincinnati State Community College and Miami University both offer affordable higher education and job placement assistance for residents of Middletown.

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

No.

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

N/A

MA-50 Needs and Market Analysis Discussion

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

Cost burden and severe cost burden represent the most prevalent housing problem in Middletown. Almost 60 percent of the City's households are in the three lowest HUD income categories and face difficulties in obtaining affordable housing that is decent and safe. These populations are concentrated in the City's low/mod Census Tracts.

Because of the amount of poverty spread throughout the City, it may be reasonably asserted that households with multiple housing problems are not concentrated in any particular area. The City's low/mod Census Tracts are all in need of reinvestment through owner and rental housing rehabilitation.

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

Census Tracts 013000, 013100, and 014000 each contain higher percentages of African-American and Hispanic populations.

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

The characteristics of these neighborhoods are consistent with the other LMI areas of the City. Homes in these areas are older and many are in disrepair because of limited financial means of owners. Single-family owner-occupied units placed on the market are reasonably priced but many require extensive renovation. Single family dwellings that have been converted to renter-occupied units also often fall into disrepair because of absentee landlords.

Are there any community assets in these areas/neighborhoods?

Middletown has invested strongly in its LMI areas both with CDBG and HOME funds as well as other available public and private funds. LMI neighborhoods have strong park systems and green space as well as social service networks available to residents. The City's sole community center is also in an LMI neighborhood. While the needs in neighborhoods are greater than the limited resources available to meet those needs, the City continues to work strategically to maximize available public and private investments. For this consolidated planning period, the City is concentrating CDBG resources and HOME funds into specific neighborhoods, starting with Oakland.

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Are there other strategic opportunities in any of these areas?

The City partners with nonprofit organizations who also concentrate efforts in specific sites. SELF provides workcamps to help with minor home repairs for LMI residents, especially the elderly. People Working Cooperatively also focuses its efforts in areas that are predominantly low and moderate income households. Middletown civic groups sponsor neighborhood clean-ups and local business districts champion quality of life events such as parades, concerts and festivals. The City also has strong relationships with the local faith community that often participate in and champion neighborhood revitalization improvements in the local community.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The latest data indicates that the City of Middletown qualifies as a low to moderate-income area on a citywide basis (56.54% of total households). The areas of racial concentration are primarily on the west and south sides of town. The City has embarked upon a new, more comprehensive strategy to overcome market forces. Given the condition of some neighborhoods, reliance on the private sector to turn undesirable neighborhoods around is an unlikely strategy. Public sector leaderships and incentives are being employed to entice private sector participation through a comprehensive multiyear revitalization process. Blighting influences are being removed and housing units are required meet the minimum building code before a neighborhood's revitalization process is concluded. This strategy requires a proactive approach and a concentration of resources into select neighborhoods, and this deliberate concentration of resources has resulted in significant progress in the targeted neighborhoods.

The needs in these target areas are numerous and varied. The principal needs are: 1) housing rehabilitation for both owner and renter units, 2) rental assistance for extremely low-income households threatened with homelessness, 3) public improvements to improve/revitalize neighborhoods, 4) demolition of dilapidated, unsafe, or abandoned properties, 5) small business assistance (loans, facades, training) 6) job training and education, and 7) assisting the homeless.

Market conditions, especially increasing rental costs, low incomes, stagnant wages, and a low vacancy rate create the needs for the rental programs, while high down payment requirements and stringent loan standards create a need for home buyer assistance programs. The presence of many abandoned, unsafe, and dilapidated structures has created the need for an aggressive acquisition and demolition program to remove these structures and improve the quality and appearance of the target neighborhoods.

Overall, the institutional delivery system functions well, but the City is working to improve its outreach and information efforts and to improve coordination, collaboration, and information sharing better among the various entities responsible for program delivery.

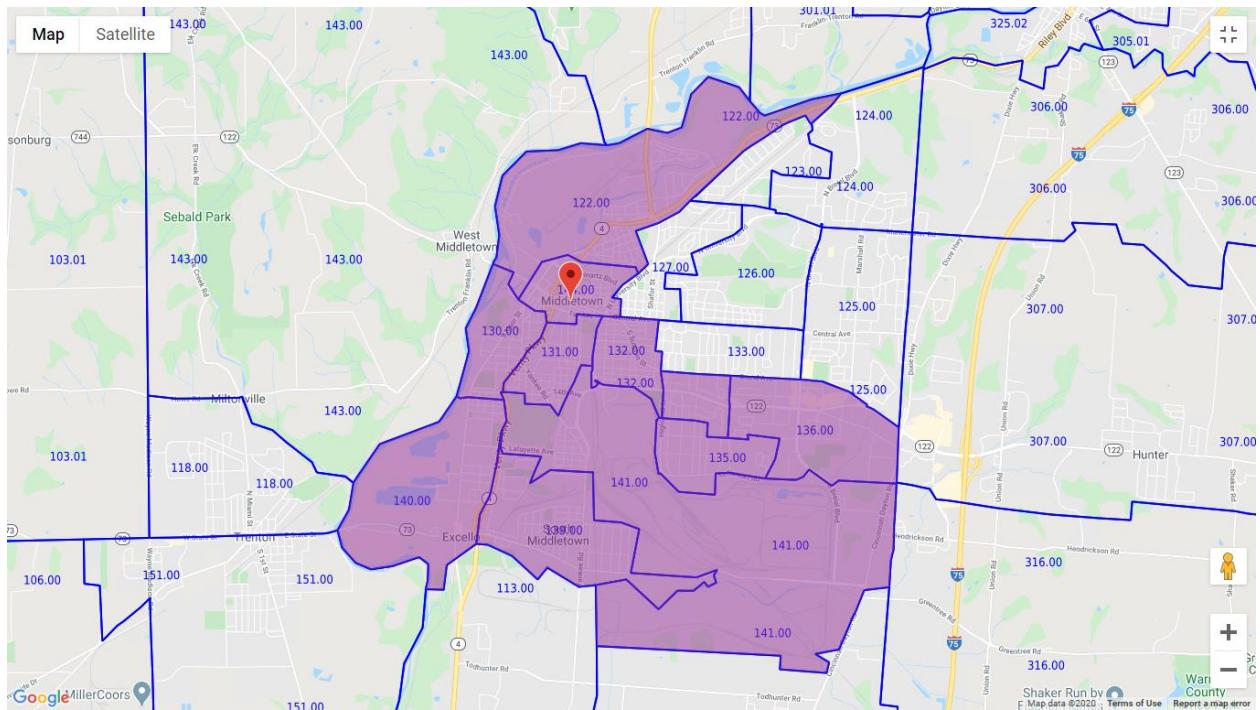
SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

1. Area Name: The latest U.S. Census data and Comprehensive Housing Affordability Strategy (CHAS) data indicate that the City of Middletown qualifies as a low to moderate-income area on a citywide basis (56.54% of total households). The areas of racial concentration are primarily on the west and south sides of town. The City is made up of 38 individual neighborhoods. Each year of this Five-year Consolidated Plan the City will focus the majority of activities in 1 -2 target neighborhoods most in need of revitalization, the first being Oakland.

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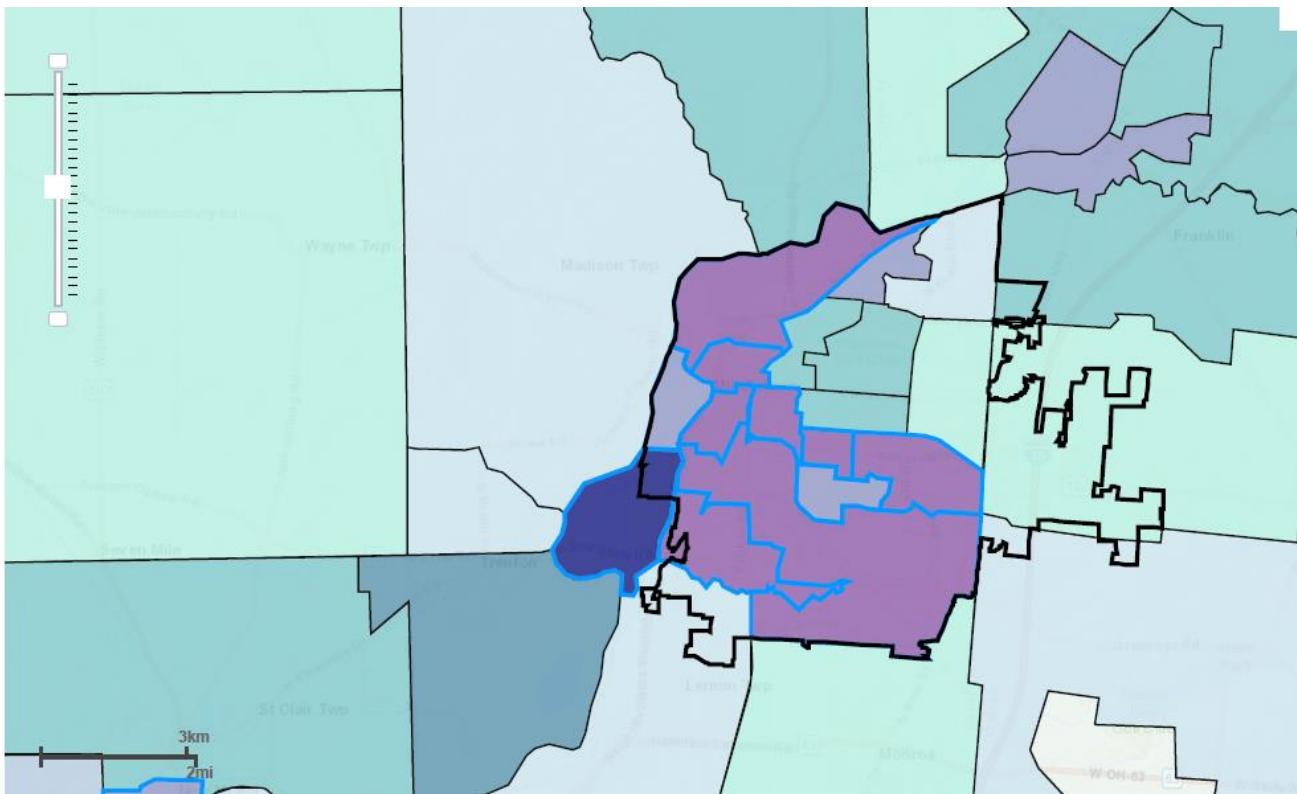
Area Type: All census tracts outlined in purple below are low/mod neighborhoods as defined by HUD



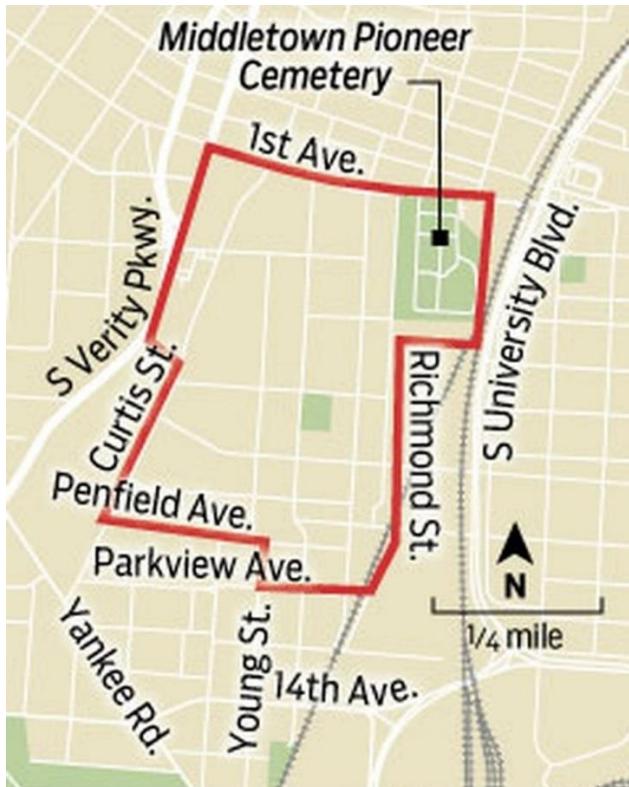
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Identify the neighborhood boundaries for this target area.

The target areas are the low/mod neighborhoods shown below.



Oakland is the target area identified for the initial efforts of CDBG and HOME funds.



Include specific housing and commercial characteristics of this target area.

Oakland is home to several historic homes and older single-family dwellings. The site houses the former Carnegie library which is being repurposed into a mixed-use development as well as the site of the former middle school. Oakland has private reinvestment plans to rehab historic homes using historic tax credits. There is also interest in repurposing the former tax-exempt property owned by the schools into new housing that would generate property tax for the district. The City hopes to use public investment alongside the current private investment efforts to renovate this LMI target neighborhood.

How did your consultation and citizen participation process help you to identify this neighborhood as a target area?

Oakland emerged as the highest priority LMI neighborhood after assessing data presented from the various community-driven studies and plans as well as through the citizen participation process for development of the ConPlan.

Identify the needs in this target area.

The needs in the target areas are: 1) housing rehabilitation for owner-occupied units, 2) Down payment assistance to convert renters to homeowners; 3) Incentivizing people who work in Middletown to live in Middletown and 4) Repairs for existing homeowners.

What are the opportunities for improvement in this target area?

The City has opportunity to leverage public funds through CDBG and HOME with private investment in the Oakland neighborhood to undertake strong revitalization activities. The City wants to provide opportunities for new homeowners through down payment assistance and live/work incentives and help existing homeowners improve the quality of their residences through repair programs. The City also wants to undertake beautification and street resurfacing to ensure a comprehensive revitalization of this neighborhood.

Are there barriers to improvement in this target area?

No. The City is positioned to move quickly on prioritizing this neighborhood for revitalization.

Table 46 - Geographic Priority Areas

General Allocation Priorities

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

Target areas are identified based on CHAS data. Prioritization of Oakland and other LMI target areas resulted from community input and use of existing plans and policies such as What If Middletown, Chamber of Commerce Focus Areas, City of Middletown Housing Policy, Danter Housing Study, Comprehensive Plan – Middletown, United Way bold goals and BCHHC CoC Plan.

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

Priority Needs

Priorities are based on input from data sets through CHAS, public participation process, City-commissioned studies and plans, recommendations of City staff, and consistency with the City Master Plan.

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

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The City will not use TBRA as part of its ConPlan strategy.
TBRA for Non-Homeless Special Needs	The City will not use TBRA as part of its ConPlan strategy..
New Unit Production	The City will not use CDBG funds to add units to the market as part of its ConPlan strategy. The City will support new development in Oakland as part of its redevelopment strategy.
Rehabilitation	Rehabilitation of owner-occupied units is a high priority in this Consolidated Plan.
Acquisition, including preservation	The City will not allocated funds for acquisition as part of its ConPlan strategy.

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

Introduction

The City of Middletown, like many communities, is faced with the challenging task of meeting increasing needs with fluctuating and/or decreasing federal and state resources.

The figures shown in the table below reflect HUD's current allocations. The figure for "Expected Amount Available Remainder of ConPlan" anticipates level funding using the 2014 allocation amounts and projecting those amounts over the four remaining years covered by the Consolidated Plan.

Anticipated Resources

Anticipated CDBG PY2020: \$733,171

Caps: Planning/Admin @ 20% = \$146,626
Public Services @ 15% = \$109,976

Housing Revitalization (Eligible CDBG activity: Housing) **\$70,000**

Emergency Repair Program (PWC)	\$50,000
SELF	\$20,000

Public Services (Eligible CDBG activity: Public Service) **\$62,500**

Fair Housing (HOME)	\$7,000
Legal Aid of Greater Cincinnati	\$15,000
CBI	\$30,000
CBI (Workforce Development)	\$30,000

Public Facilities & Improvements (Eligible CDBG activity: Public Improvements) **\$434,537**

Street Resurfacing/ Beautification	\$434,537
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Grants Administration **\$146,626**

Planning/Program Administration – CDP	\$146,626
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Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City is working closely with development partners of the Oakland neighborhood to leverage private/public funds. In addition, matching requirements are satisfied through other eligible local resources and in-kind services.

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

In cooperation with Butler County, the City is part of the Butler County Land Bank. Middletown will continue to utilize the land bank to acquire vacant lots and properties to use for resale, demolition, or rehabilitation as appropriate.

SP-40 Institutional Delivery Structure – 91.215(k)

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

Department of Administrative Services (DAS) is lead for the administration of CDBG and HOME funds for the City of Middletown. DAS partners with Community Development Professionals (CDP) to handle its day-to-day administration of CDBG and HOME funds. CDP's system provides strong controls for processing invoices and ensuring compliance with HUD mandates and directives. In addition, DAS reviews and approves all expenditures and works within the City's framework to ensure all mandates, directives, policies and protocols are followed.

The HOME program is administered in partnership with Butler County through the HOME consortium. HOME first time home buyer down payment assistance is processed through a local nonprofit, Neighborhood Housing Services. NHS processes, CDP reviews and approves and forwards to DAS for payment processing.

DAS is active in the Butler County Homeless Coalition and the Butler County Foreclosure Prevention Group. The Department interacts, cooperates and coordinates on an ongoing basis with many non-profits to ensure the best delivery of services without duplication of efforts. Butler County and the City of Middletown have a joint HOME Consortium for utilization of HOME funds.

Butler Metropolitan Housing Authority and the Warren Metropolitan Housing Authority administer Section 8 for the area and continue to operate public housing in the City of Middletown. While the City has no direct control over the Butler Metropolitan Housing Authority or the Warren Metropolitan Housing Authority, which are administered by Boards appointed by their respective County Commissioners, DAS staff have a good working relationship with both housing authorities. The entities cooperate with City staff on crime and code enforcement issues.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Department of Administrative Services	Government	Lead Agency	City
Butler County Housing and Homeless Coalition	Nonprofit	Homelessness, CoC, and Housing	City & County
Butler Metropolitan Housing Authority	Government	Public Housing, Section 8	City and County
Warren Metropolitan Housing Authority	Government	Section 8/HCV	City and County
Public Works and Utilities Department	Government	Infrastructure	City
Legal Aid of Greater Cincinnati	Nonprofit	Housing	Region
Neighborhood Housing Services	Nonprofit	Housing	City

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Butler County Homeowner Preservation Group	Nonprofit	Housing	County
Middletown Community Foundation	Nonprofit	Community Services	City
United Way of Greater Cincinnati	Nonprofit	Community Services	Region

**Table 50 - Institutional Delivery Structure
Assess of Strengths and Gaps in the Institutional Delivery System**

The institutional structure involved carrying out the City's housing, homeless, and community development plan includes, in addition to the Lead Agency, the public, municipal officials, private non-profit organizations, faith-based and community organizations, public housing agencies and other public institutions. The strength of this structure is that these organizations make up the City's service delivery system and the public often serves as an informal outreach mechanism that helps link residents with services.

The City will continue to work closely with Butler County in several areas including social services, lead abatement and mental health services. The City anticipates continued active participation in the Butler County Housing and Homeless Coalition.

The City will continue to seek to establish new relationships with the private sector to accomplish economic and community development activities.

One of the strengths of the delivery system is the City's outreach and information efforts. The City works diligently to involve and inform as many agencies, organizations and institutions of the HUD programs, and has been successful in this regard. The program information that is disseminated is detailed and identifies the City's priority areas and priority needs. The types of programs and activities that can be funded under each of HUD programs and those activities that are not eligible for funding are clearly defined and the City helps grant applicants understand program requirements, the application and selection process, and the City's expectations for program reporting. The staff also sits on many local boards/commissions and hold leadership positions in a number of organizations because of their knowledge and expertise.

One of the greatest difficulties Community Revitalization faces is ensuring that sub-recipients understand program and reporting requirements. The City provides information sessions to address this gap that applicants and grantees have identified in recent meetings. These sessions provide the information needed for applicants to properly complete the application process and ensure that their programs or activities are appropriate for HUD funding. At the same time, applicants are made aware of the reporting requirements and measures that they must meet if awarded a grant.

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement	X	X	X
Mobile Clinics	X	X	X
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X

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Table 51 - Homeless Prevention Services Summary

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

The County is part of the Balance of State for Ohio and in Region 14. The Butler County Housing and Homeless Coalition oversees the local continuum of care under the direction of the Coalition on Housing and Homelessness in Ohio. The local community follows a housing first model and prioritizes chronically homeless individuals.

The local CoC uses Coordinated Entry (CE) which is locally coordinated at Hope House in Middletown. All persons seeking shelter call a general number for entry into the CoC. The CE Access Point makes referrals through the Homeless Information Management System to the appropriate shelters within the system. Data across systems providers is managed in HMIS.

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

This delivery system includes a wide range of services for special needs populations and persons experiencing homelessness, and through the Continuum of Care, these programs are coordinated into a County-wide strategy to prevent homelessness and address it in a comprehensive manner. The primary strength of addressing homelessness through participation in the Continuum of Care is that it allows continuum partners to focus resources on specific issues in order to avoid duplication of services. The Continuum also allows for a wider array of voices to be heard on what is a wide ranging issue.

BCHHC meets monthly to provide information and coordinate resources. BCHHC also participates in quarterly regional meetings. CE is a best practice across CoC systems.

There are insufficient capacity for family shelter in the county. The City is working with BCHHC on ways to close the gaps across the continuum.

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

The City of Middletown plans to undertake the following actions during the next program year to further develop an improved institutional structure:

- 1) Continue and enhance private sector involvement.
- 2) Continue as an active member in the Butler County Housing and Homeless Coalition.
- 3) Continue regional meetings with adjacent jurisdictions to discuss community needs.
- 4) Continue cooperation with local funding agencies, such as the United Way and the Middletown Community Foundation, to assist wherever possible.
- 5) Continue as an active member of the Butler County Homeowner Preservation Group, seeking resources to keep homeowners in their home and reduce foreclosures.

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Revitalization	2020	2025	Quality Affordable Housing	Citywide	Quality affordable housing	CDBG	Number of Units Rehabbed
2	Neighborhood Revitalization	2020	2025	Quality Affordable Housing; Suitable living environment	Citywide	Quality affordable housing; Quality of Life	CDBG	Number of Improvements
3	Public Services	2020	2025	Suitable living environment	Citywide	Quality of Life	CDBG	Number of Persons Assisted
4	Fair Housing	2020	2025	Suitable living environment	Citywide	Quality of Life	CDBG	Number of Persons Assisted
5	Public Facilities Improvements	2020	2025	Suitable living environment	Citywide	Quality of Life	CDBG	Number of Persons Assisted
6	Homeless Activities; prevention, shelters, transitional	2020	2025	Quality Affordable Housing	Citywide	Quality affordable housing	CDBG	Number of persons or households assisted
7	Economic Development	2020	2025	Economic Opportunity	Citywide	Economic Growth	CDBG	Number of businesses assisted

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Goal Descriptions

Housing Revitalization – Emergency home repairs, home rehabilitation

Neighborhood Revitalization – Neighborhood improvements

Public Services – Programs for youth, workforce development

Fair Housing – Fair Housing programs and services; support for legal aid

Public Facilities – Repairs and Improvements to public facilities

Infrastructure – Improvements for municipal infrastructure, including streets, water, sewer and lighting

Homeless Activities – homelessness prevention, emergency shelters, transitional housing

Economic Development – business assistance

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

100 households will be assisted with affordable housing services.

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

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

This will be accomplished as needed through the City's subrecipients.

Activities to Increase Resident Involvements

This is a function of the two Housing Authorities and City CDBG funds are not planned to be used for this activity.

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

No

Plan to remove the 'troubled' designation

Not Applicable

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

Barriers to Affordable Housing

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The City of Middletown will:

- 1) Assist LMI home owners living in target areas to repair/rehab their homes.
- 2) Provide down payment/closing cost assistance to encourage home ownership.
- 3) Work to increase income of LMI households to remove cost burden.

SP-60 Homelessness Strategy – 91.215(d)

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

The City will continue its participation in the Butler County Housing and Homeless Coalition which reaches out to sheltered and unsheltered persons to assess needs and provide services.

Addressing the emergency and transitional housing needs of homeless persons

The City does have several shelters to provide emergency and transitional housing for the homeless. These include Hope House Rescue Mission, which provides assistance to up to 40 homeless men, the Center of Hope for Women and Children in Middletown, a 25-unit facility and the Shalom network of shelters. Other services for the homeless are provided through the Butler Housing and Homeless Coalition.

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

The City cooperates with the Butler County Housing and Homeless Coalition to rehouse persons experiencing homelessness and provide wraparound services to limit recidivism.

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

Services offered to residents of Middletown and Butler County to prevent homelessness include the Emergency Money Fund and Homeless Crisis Response Program administered through Warren Metropolitan Housing Authority. There are also funds available for emergency rent and utility payment through SELF, the local Community Action Program (CAP) agency. Additionally, Butler Metropolitan Housing Authority (BMHA) has a working relationship with Transitional Living who provides mental health assessment and permanent housing placement services.

Activities planned to implement a community-wide discharge policy begin with the Butler County Housing and Homeless Coalition. Homeless providers serving not just Middletown, but the entire county meet monthly and are developing a community-wide policy.

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

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

The City takes various steps to evaluate and reduce lead-based paint hazards. When executing the City's Rehabilitation Program, the HUD Field Project Manager reviews the site for a preliminary estimate of work items and evaluates the condition of the house. He is also a licensed lead risk assessor and abatement contractor. The age of the house is then determined by County Auditor records. If the possibility of lead is present in a home, the HUD Field Project Manager performs a risk assessment to determine any lead hazards and areas of concern which could be damaged during construction. At the conclusion of rehabilitation work, a clearance test is performed to ensure that the area is free of any lead based paint contamination.

The City of Middletown generally caps its rehabilitation projects at \$25,000, to avoid full lead abatement.

The HUD Field Project Manager and the HUD Program Administrator are licensed Lead Safe Renovators. The Department of Administrative Services has sent appropriate staff to the proper courses to achieve Lead Abatement Contractor certification which permits City staff to write specs for rehabilitation work involving disturbance of lead based paint surfaces.

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

Throughout the City, children continue to be faced with developmental, behavioral, and intellectual impediments from exposure to toxic sources of lead in their homes. More than 50% of the housing stock was built before 1950 when lead-based paint was commonly and legally used. The housing stock has aged to a point of dilapidation, disrepair and continues to be the major source of lead exposure to children.

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

The City has a staff member that is a lead risk assessor and a lead abatement contractor. All lead hazards are addressed appropriately according to the Lead-Safe Housing Rule. In addition, contractors used by the City are RRP certified lead safe renovators. All rehab work utilizes appropriate lead-safe work practices and lead abatement where deemed necessary.

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

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

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

The City works to coordinate its various plans and services including its own comprehensive plan and this Consolidated Plan. The City of Middletown supports the efforts of SELF, the local Community Action Agency, to identify and eliminate poverty in the community. In addition, Middletown has prioritized workforce development in this Consolidated Plan in order to raise the income levels of LMI households in the city.

The City of Middletown will continue to work with regional governments, county governments, and departments, agencies and nonprofits, families and citizens to keep residents in their homes, assist families to purchase homes, and maintain and improve communities in which people wish to stay and raise families.

SP-80 Monitoring – 91.230

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

Prior to implementation, all housing and community development projects are first approved by the Department of Administrative Services staff and are reviewed for: consistency with the Consolidated Plan and Annual Action plan, overall activity eligibility, meeting a national objective, adherence to all regulations, consistency with the housing analysis and the City's Master Plan, citizen input, capacity of staff, timeliness expectations, priorities of City Council and the City Manager, the need for specific public services, and the expertise of all parties to complete the activity.

Once the projects are implemented, they are monitored to ensure compliance with appropriate mandates and directives. This includes but is not limited to: proper procurement practices, minority business outreach, Section 3 applicability, Davis-Bacon applicability, etc. This overall project monitoring is accomplished by having CDP ensure compliance, forwarding payment requests to the DAS and then to finance to be paid. This three-tiered approval process ensures all projects are eligible and payments are processed appropriately. In addition, all projects are reviewed on an ongoing basis to ensure the City is on track to reach goals specified in the Annual Action Plan. If the goals cannot be reached, adjustments will be made to the project in the following program year, or the project will be replaced where appropriate.

The City maintains a list of minority businesses and invites participation in HUD-funded activities at least annually. The City's procurement officer keeps the approved contractor database open in order to give new businesses the chance to get on the City's approved contractor list. In the process of soliciting new contractors, it is strongly encouraged that minority businesses apply. Further efforts to reach out will be accomplished by placing ads in the local newspaper and advising organizations such as the NAACP, the Ministerial Alliance and the United Way.

DAS uses subrecipients to implement programs and provide public services. The City offers a competitive process to compete for funds. Subrecipients are selected, trained and monitored to ensure program compliance regarding eligibility, national objective, and all appropriate regulations. This monitoring strategy will involve mandating quarterly progress reports from each subrecipient listing the amount of funding they have spent, the number of people served, the race and ethnicity of people served, and the income bracket of all people served. In addition to the quarterly progress reports, a representative from the City will perform at least one on-site visit per program year to each funded subrecipient. At the on-site visit, random files will be checked for overall compliance, accounting practices reviewed, and the funds allocated to them for the program year will be checked for timeliness.

Expected Resources

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

Introduction

Anticipated CDBG PY2020: \$733,171

Caps: Planning/Admin @ 20% = \$146,626
Public Services @ 15% = \$109,976

Housing Revitalization (Eligible CDBG activity: Housing)	\$70,000
Emergency Repair Program (PWC)	\$50,000
SELF	\$20,000
Public Services (Eligible CDBG activity: Public Service)	\$62,500
Fair Housing (HOME)	\$7,000
Legal Aid of Greater Cincinnati	\$15,000
CBI	\$30,000
CBI (Workforce Development)	\$30,000
Public Facilities & Improvements (Eligible CDBG activity: Public Improvements)	\$434,537
Street Resurfacing/ Beautification	\$434,537
Grants Administration	\$146,626
Planning/Program Administration – CDP	\$146,626

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

The City administration recognizes that the City's annual entitlement and formula allocations are not sufficient to meet all of its needs, and that leveraging resources is critical to achieving the City's goals. The City will continue to cultivate funding partners who can match the City's investment of CDBG funds.

The City has worked closely with the Butler County Office of Community Development as a member of the County's Home Investment Partnership (HOME) Program. Historically, the City had occasionally solicited applications for owner-occupied rehabilitation projects for referral to the County program. The City has been successful in leveraging significant funds from the State Demolition Grant Program and will continue this effort.

Matching requirements have been satisfied with other eligible financial resources and/or in-kind services, and the City will continue to seek this type of matching as well as financial matches.

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

The City is working with a development team to develop the Oakland neighborhood. Additional vacant lots and land may be identified that can contribute toward the larger work to be accomplished through Consolidated Plan. The City owns several vacant commercial properties and will work with Economic Development to find the best possible use for those properties.

Projects

AP-35 Projects – 91.220(d)

Introduction

The development of the Annual Action Plan involved consultation with those agencies involved in delivering housing and housing services within Middletown. Meetings and discussions were held between the staff of the City's Department of Administrative Services and other City Departments, as well as conducting meetings with appropriate housing and social service agencies regarding the housing needs of children, elderly persons, persons with disabilities, homeless persons. Public input was also solicited through focus groups, public hearings, and a web-based survey. All projects selected to receive funding meet objectives and goals set by the City to address housing and social needs.

Projects

#	Project Name	Proposed Budget
1	Emergency Repair Program (SELF/PWC)	\$70,000
2	Workforce Development (CBI)	\$30,000
3	Fair Housing: HOME/Legal Aid	\$22,000
4	Community Activities (Youth Services)	\$30,000
5	Oakland Beautification/Public Infrastructure	\$434,537
6	Planning/Program Administration	\$146,634

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

These projects are deemed to be of the highest priority and meet the greatest need. All allocation amounts and specific projects have been approved by City Council.

AP-38 Project Summary

Project Summary Information

- Focus on Oakland Neighborhood
 - Continue emergency home repair
 - SELF \$20,000
 - PWC \$50,000
 - Continue down payment assistance (HOME funds = \$268,833)
 - Community improvements \$434,537
 - Beautification/Street resurfacing
- Continue fair housing
 - HOME \$7,000
 - Legal Aid \$15,000
- Community activities
 - CBI \$30,000
- Workforce development
 - CBI \$30,000

AP-50 Geographic Distribution – 91.220(f)

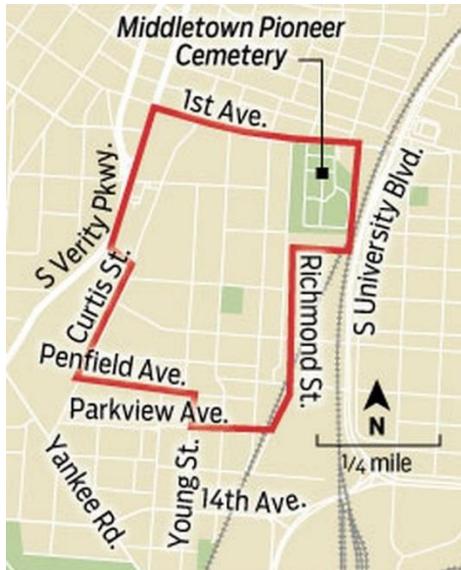
Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Geographic Distribution

1. Area Name: The latest U.S. Census data and Comprehensive Housing Affordability Strategy (CHAS) data indicate that the City of Middletown qualifies as a low to moderate-income area on a citywide basis (56.54% of total households). The areas of racial concentration are primarily on the west and south sides of town. The City is made up of 38 individual neighborhoods. The City will initially focus the majority of activities in Oakland target neighborhood.

Area Type: All are low/mod neighborhoods as defined by HUD

Identify the neighborhood boundaries for this target area.



Identify the needs in this target area.

Oakland is home to several historic homes and older single-family dwellings. The site houses the former Carnegie library which is being repurposed into a mixed-use development as well as the site of the former middle school. Oakland has private reinvestment plans to rehab historic homes using historic tax credits. There is also interest in repurposing the former tax-exempt property owned by the schools into new housing that would generate property tax for the district. The City hopes to use public investment alongside the current private investment efforts to renovate this LMI target neighborhood.

**Table 56 - Geographic
Distribution**

Rationale for the priorities for allocating investments geographically

All funds and activities will be targeted at LMI areas and/or LMI households.