

Executive Summary

AP-05 Executive Summary - 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. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City's priority needs can be delineated into the 2 categories: (1) supports for low-income families and (2) community revitalization activities. The City is undertaking nine activities to address identified priority needs in the 5-yr consolidated plan.

- 1) Distressed and dilapidated housing: The City is addressing distressed owner-occupied housing to 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 ConPlan. Funds are being targeted in LMI neighborhoods to help address lack of amenities such as green space and improve visual appeal through neighborhood beautification.
- 4) Lack of qualified work force. The City's strategy is to address issues of generational poverty and strengthen the economic core of the community. This strategy connects public/private resources with partner efforts to improve the local economy. Through the 5-yr ConPlan the City is working 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 CBI, the City continues its work to meet the activity needs of LMI youth.
- 6) Insufficient social services including mental health and substance use disorder treatment. The City leverages established partnerships and actively supports efforts to strengthen social services in the community.
- 7) Addressing needs of homeless households. The City's homelessness strategy was developed in cooperation with 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 unhoused 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 continues to draw on its affordable housing partners such as BMHA, BCHHC and NHS to ensure LMI renter households have decent, safe and

sanitary housing options. In addition, the City continues 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 and Legal Aid.

3. Evaluation of past performance

The City is committing resources and leveraging partnerships to address its nine identified goals and priorities. 1) Distressed and dilapidated housing: The City invested CDBG funds to address distressed owner-occupied housing for LMI households through its partnership with SELF and PWC. 2) Poor street conditions: CDBG funds were invested to improve streets in LMI neighborhoods and thoroughfares, a significant need and high priority. 3) Lack of amenities and attractive neighborhood appeal. The City committed CDBG funds to beautify a LMI neighborhood park. 4) Lack of qualified work force. The City continued to invest in workforce development through its partnership with CBI, specifically 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 continued to allocate CDBG resources to provide a safe haven for youth in the City through its partnership with CBI. 6) Insufficient social services. The City allocated resources to fill a gap in social services for LMI seniors. 7) Addressing needs of homeless households. The City continued its partnership with the Butler County Housing and Homeless Coalition to support efforts to address roots causes of homelessness and the community's broader response to the continuum of care for those experiencing homelessness. 8) Ensuring there is appropriate housing for LMI households: The continued to draw on its affordable housing partners such as BMHA, BCHHC and NHS to ensure LMI renter households have decent, safe and sanitary housing options. In addition, the City continued to offer down payment assistance for LMI homeowners and work through key partners to provide LMI homeowner repairs and rehabilitation. 9) Fair housing activities: The City allocated CDBG resources to provide education and respond to fair housing complaints through its partnerships with HOME and Legal Aid. 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

Summary from citizen participation section of plan.

A well-publicized public hearing was held to present and review the Annual Action Plan on March 19, 2024 at City Hall, One Donham Plaza, Middletown, Ohio. This session is part of a strategic effort to maximize participation by the public to the greatest extent possible. The public hearing was advertised in the local newspaper, announced on the City's social media channels, through letters sent to local community organizations, and on the city's website.

The City invited community organizations to be included in the Annual Action Plan by providing opportunities for organizations to submit projects to be included in the plan. Ten projects were submitted for consideration.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The City followed its HUD-approved plan for citizen participation. For the Annual Action Plan, comments were sought for inclusion both from an advertised public hearing on March 19, 2024 and the 30-day comment period which ran from March 4, 2024 through April 3, 2024.

Funding allocations were announced by HUD on May 7, 2024. The City's allocation is significantly less than what was anticipated and a second 30-day public comment period was held that ran from May 15 through June 14, 2024.

One resident spoke during the public hearing and also submitted her concerns via email. She did not have any comments regarding changes to the Annual Action Plan recommendations or categories for funding. Her comments were of a general nature about timeline for submission of the AAP and projects that have been funded in previous years of Consolidated Plan. The City has responded to her questions. No other comments were received during the common period.

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

N/A

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

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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	
CDBG Administrator	MIDDLETOWN	Development Services Department

Table 1 – Responsible Agencies

AP-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, 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 representative from Development Services Department 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, 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 kept apprised of needs and coordinate efforts to meet needs in the community.

For the development of the Annual Action Plan, the City sought input from its community partners and through its citizen participation activities.

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 113 chronically homeless individuals and families. The Ohio Department of Development 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, BOSCOB 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 BOSCOB, 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 coordinates programs around homeless services within the county. The City is actively involved with this Coalition and its members.

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 for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and 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, HUD provides resources to communities around the country through its Continuum of Care Homeless Assistance Programs. ODOD and COHHIO coordinate the process and prepare the application for funding for the BOSCOB. To this end, a regional board as well as BCHHC engage with individual nonprofit partners to outline a strategy for local services and programs.

BOSCOB Advisory Board

The Advisory Board is the primary planning body for the BOSCOB. 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, ODOD and the Director for Community Development, ODOD.

BOSCOB 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 BOSCOB members, and engage in long-term CoC strategic planning. Members of the committee include staff of ODOD, COHHIO, and the Ohio Department of Mental Health (ODMH).

BOSCOC Outcomes and Performance Committee

The Outcomes and Performance Committee is responsible for developing and implementing plans for the monitoring of BOSCOC 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.

BOSCOC HMIS Core Group

The HMIS Core Group coordinates statewide HMIS training and data collection for all BOSCOC 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 BOSCOC HMIS.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Butler Metropolitan Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in focus group for housing needs, fair housing issues, and needed public services. Completed Stakeholder survey and participated in one on one interview. Discussed coordination between mental health, homeless and economic development.
2	Agency/Group/Organization	Butler County Housing and Homeless Coalition
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Regional organization Planning organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City works closely with BCHHC. Participated in focus group for anti-poverty strategy, homelessness needs and services and needed public services. Completed Stakeholder survey and participated in one on one interview. Discussed coordination between social service providers and community stakeholders.
3	Agency/Group/Organization	SELF (SUPPORTS TO ENCOURAGE LOW-INCOME FAMILIES)
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Employment
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in focus group for anti-poverty strategy and needed public services. Completed Stakeholder survey and participated in one on one interview. Discussed coordination between social service providers and community stakeholders.
4	Agency/Group/Organization	HOUSING OPPORTUNITIES MADE EQUAL
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in discussion around issues of fair housing through one on one interview. Discussed coordination between social service providers and community stakeholders.

5	Agency/Group/Organization	PEOPLE WORKING COOPERATIVELY
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in focus group for housing, anti-poverty strategy and needed public services. Completed Stakeholder survey and participated in one on one interview. Discussed coordination between housing assistance providers and community stakeholders.
6	Agency/Group/Organization	NEIGHBORHOOD HOUSING SERVICES OF HAMILTON
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in focus group for housing, anti-poverty strategy and needed public services. Completed Stakeholder survey and participated in one on one interview. Discussed coordination between housing providers and community stakeholders.
7	Agency/Group/Organization	Community Building Institute
	Agency/Group/Organization Type	Services-Children Services-Employment
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in focus group for youth services, workforce development and anti-poverty strategy and needed public services. Completed Stakeholder survey and participated in one on one interview. Discussed coordination between housing providers and community stakeholders.
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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 and HOME 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?
Continuum of Care	Butler County Housing and Homeless Coalition	BCHHC CoC Plan for Butler County was used to inform housing and homeless priorities of ConPlan.

Table 3 - Other local / regional / federal planning efforts

Narrative

AP-12 Participation - 91.401, 91.105, 91.200(c)

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

The City 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.

A well-publicized public hearing was held on **March 19, 2024** at City Hall, One Donham Plaza, Middletown, Ohio. This session was 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 and on the city's website.

The City invited community organizations to be included the Annual Action Plan by providing opportunities for organizations to submit projects to be included in the plan. Ten projects were submitted 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.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	1 attendee	1	n/a	n/a

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Non-targeted/broad community	1 comment received	General concerns about process, not concerns specific to current Annual Action Plan	N/A	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

The figures shown in the table below reflect HUD's current allocations. The figure for "Expected Amount Available Remainder of ConPlan" anticipates level funding over the five-year plan (at PY2023 amount).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	615, 629	0	0	615,629	615,629	These funds will be directed toward specific eligible activities designed to meet the outcomes outlined in the consolidated plan.
Other	public - federal	Other	0	0	0	0	0	

Table 5 - Expected Resources – Priority Table

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

matching requirements will be satisfied

The City continues to work closely with development and social services partners to leverage private/public funds that impact LMI communities. 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.

The City of Middletown also owns the Robert Sonny Hill Jr Community Center which houses activities of CBI. CBI has been awarded funds in this Annual Action Plan for youth programming and workforce development activities.

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing revitalization	2020	2024	Affordable Housing	Citywide Middletown LMI Target Areas	Address distressed and dilapidated housing	CDBG: \$120,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 100 Households Assisted
2	Public Services	2020	2024	Non-Housing Community Development	Citywide	Lack of qualified work force Lack of youth activities	CDBG: \$72,844	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted
3	Fair Housing	2020	2024	Fair Housing	Citywide	Fair housing activities	CDBG: \$19,500	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
4	Neighborhood Revitalization	2020	2024	Non-Housing Community Development	Middletown LMI Target Areas	Lack of amenities/neighborhood appeal in LMI areas	CDBG: \$280,160	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1313 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Housing revitalization
	Goal Description	Funds will be provided to SELF and People Working Cooperatively to assist in home repair for LMI homeowners.
2	Goal Name	Public Services
	Goal Description	Workforce development activities for LMI households. Activities for LMI youth.
3	Goal Name	Fair Housing
	Goal Description	Fair housing and legal services provided.
4	Goal Name	Neighborhood Revitalization
	Goal Description	Beautification in LMI neighborhood(s).

AP-35 Projects - 91.420, 91.220(d)

Introduction

The development of the Annual Action Plan involved consultation with those agencies involved in delivering services consistent with the City's priorities and staff of the various City departments delivering activities planned in the AAP. All projects selected to receive funding meet objectives and goals set by the City to address priority needs.

#	Project Name
1	Legal Aid Society of Greater Cincinnati
2	Housing Opportunities Made Equal
3	Community Building Institute-Community Center Program
4	Community Building Institute
5	Emergency Repair Program (PWC)
6	Emergency Repair Program (SELF)
7	Infrastructure and Improvements -Oakland
8	Planning/Program Administration

Table 7 – Project Information

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

Allocations are based on identified priorities as outlined in the five-year Consolidated Plan.

AP-38 Project Summary
Project Summary Information

1	Project Name	Legal Aid Society of Greater Cincinnati
	Target Area	Citywide
	Goals Supported	Fair Housing
	Needs Addressed	Fair housing activities
	Funding	CDBG: \$12,000
	Description	Address housing problems by providing legal assistance to low-income tenants and homeowners, and facilitate access to emergency funds when facing eviction or foreclosures.
	Target Date	4/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	28 LMI households will be served.
	Location Description	Available city-wide to LMI households.
	Planned Activities	Provide legal services relative to fair housing issues for LMI families.
2	Project Name	Housing Opportunities Made Equal
	Target Area	Citywide
	Goals Supported	Fair Housing
	Needs Addressed	Fair housing activities
	Funding	CDBG: \$7,500
	Description	Fair housing counseling, testing, training and reach out program.
	Target Date	4/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	60 LMI households will benefit from this activity.
	Location Description	Activities are available city-wide.
	Planned Activities	Education, awareness and responses to fair housing complaints.
3	Project Name	Community Building Institute-Community Center Program
	Target Area	Citywide Middletown LMI Target Areas
	Goals Supported	Public Services

	Needs Addressed	Lack of youth activities
	Funding	CDBG: \$37,844
	Description	CDBG funds will be used to partner with CBI for youth activities and workforce development activities
	Target Date	4/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	520 unduplicated youth will be served through on-site activities.
	Location Description	Services are offered at CBI which is located in the Douglass Neighborhood, a targeted, LMI community. Access to activities are available to any LMI household in the City of Middletown
	Planned Activities	Activities include groups, recreational activities, community gardening and other constructive activities.
4	Project Name	Community Building Institute
	Target Area	Citywide Middletown LMI Target Areas
	Goals Supported	Public Services
	Needs Addressed	Lack of qualified work force
	Funding	CDBG: \$35,000
	Description	Youth Academic, recreational and leadership programs
	Target Date	4/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	75 served through workforce development.
	Location Description	Services are offered at CBI which is located in the Douglass Neighborhood, a targeted, LMI community. Access to activities is available to any LMI household in the City of Middletown.
	Planned Activities	Resume writing, soft-skill development, job coaching and placement.
5	Project Name	Emergency Repair Program (PWC)
	Target Area	Citywide
	Goals Supported	Housing revitalization

	Needs Addressed	Address distressed and dilapidated housing
	Funding	CDBG: \$80,000
	Description	PWC provides home repair to LMI households
	Target Date	4/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	50 households will benefit from home repairs offered through PWC.
	Location Description	PWC services are available city-wide to LMI households.
	Planned Activities	Emergency home repairs to LMI households.
6	Project Name	Emergency Repair Program (SELF)
	Target Area	Citywide
	Goals Supported	Housing revitalization
	Needs Addressed	Address distressed and dilapidated housing
	Funding	CDBG: \$40,000
	Description	SELF provides home repair to LMI households
	Target Date	4/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	20 households will be served through homeowner repair.
	Location Description	Assistance is available city-wide to LMI households.
	Planned Activities	Homeowner repair to qualifying LMI households.
7	Project Name	Infrastructure and Improvements
	Target Area	Middletown LMI Target Areas
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Lack of amenities/neighborhood appeal in LMI areas
	Funding	CDBG: \$280,160
	Description	Infrastructure and Improvements
	Target Date	4/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	1,313 served in the immediate neighborhood area.
	Location Description	LMI target neighborhood
	Planned Activities	The City is targeting its resources in LMI neighborhoods within City limits. Funds will be targeted to help address lack of amenities such as green space and create strong visual appeal through neighborhood beautification.
8	Project Name	Planning/Program Administration
	Target Area	Citywide
	Goals Supported	Housing revitalization Neighborhood Revitalization Public Services Fair Housing
	Needs Addressed	Address distressed and dilapidated housing Improve the condition of streets in LMI areas Lack of amenities/neighborhood appeal in LMI areas Lack of qualified work force Lack of youth activities Insufficient social services to meet need Addressing needs of homeless households Appropriate housing for LMI households Fair housing activities
	Funding	CDBG: \$123,125
	Description	Costs related to grant administration
	Target Date	4/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Administrative costs for PY24
	Location Description	n/a
	Planned Activities	Program Admin for PY24

AP-50 Geographic Distribution - 91.420, 91.220(f)

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

Public facilities and housing activities will be targeted to LMI neighborhoods in Middletown.

Public service activities (workforce development and youth activities) will be provided in the Douglass Neighborhood but open to all LMI qualifying persons throughout the City of Middletown.

Fair housing activities will be available to LMI-qualifying households throughout the City.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	33
Middletown LMI Target Areas	67

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

A significant portion of funds is being used to improve one LMI target area. CBI is located in a target LMI area and serves many residents within walking distance. Other identified Consolidated Plan priorities such emergency home repair and fair housing are available to LMI households city-wide.

Discussion

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

The City of Middletown uses controls such as zoning ordinances, subdivision controls, permit systems, and housing codes and standards to ensure access to affordable and quality housing. The City is committed to ensuring the health, safety, and quality of life of its residents while minimizing the barriers that may impede the development of affordable housing.

Middletown has a significant number of old housing units. These units contain lead-based paint, asbestos, mold, or other hazards, which must be remediated in order to make the houses safe and bring them up to code. For units which are reparable without the need for full remediation, the City uses its CDBG funds through SELF and PWC to accomplish home repair. Other homes are removed through demolition while a fair number continue to be in disrepair. Housing efforts for the proposed annual action plan will be geared toward affordable housing development using in-fill lots in the Oakland area.

Middletown partnered with Butler County for the most recent development of Analysis of Impediments to Fair Housing Choice. The AI drives efforts for ensuring the city continues to remove identified barriers and work to increase access to fair housing for all residents.

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

The AI revealed that the City of Middletown's public policies do not create barriers to affordable housing. The City's zoning ordinances, subdivision controls, permit systems, and housing codes and standards support the development of housing redevelopment. The City has been part of the local land bank and will seek to use this resource to better ready the community for residential investment.

Discussion

The City will continue its work to implement recommendations outlined in its AI. The City addresses fair housing through partnerships with Legal Aid and HOME and proactively seek redevelopment of affordable housing as it focuses its funds on housing for LMI households.

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

The ongoing challenge for the City is to adequately meet needs with its available resources. The City constantly looks for opportunities to partner and seek greater levels of collaboration with local agencies and organizations in order to maximize and leverage its funds.

Actions planned to address obstacles to meeting underserved needs

The City promotes its housing and community service programs in the areas with the highest concentration of low and moderate income households to address the continuing needs of the underserved population. The City uses its network of community based organizations, nonprofit, Chamber of Commerce, local newspaper, City newsletter, and community events to promote its activities and services.

Actions planned to foster and maintain affordable housing

As articulated in the Consolidated Plan, the City will continue coordination and collaboration with the Butler Metropolitan Housing Authority, Butler County Land Bank, Butler County Housing and Homeless Coalition and other local nonprofits and public providers to foster and maintain affordable housing through:

- Mortgage assistance programs (HOME funds through Butler County Consortium)
- Development of workforce and affordable housing (CDBG and HOME funds)
- Coordination with neighborhood networks to elaborate on the needs of the community
- Housing Revitalization Programs (home repair assistance)
- Infrastructure improvements
- Provision of Fair Housing Services

Actions planned to reduce lead-based paint hazards

The City will use its own funds to maintain current efforts to reduce lead-based paint hazards. No CDBG funds are anticipated to be used to this end.

Actions planned to reduce the number of poverty-level families

The City takes a balanced approach to community revitalization. The economic development team and partners such as Small Business Development Center and Downtown Middletown Inc work to stabilize and attract small business in an effort to create jobs and improve the local economy. Key stakeholders such as Community Building Institute, SELF, Miami University Middletown (Regionals) and Middletown City Schools are working on issues of workforce development and life skills training. CDBG provides

critical funding for large-scale infrastructure improvements and removal of blight but relies on its community partners to engage in meeting critical basic needs such as healthcare, childcare, housing, and transportation. The alleviation of poverty is complicated and requires a multi-faceted approach. The City works with community partners to identify educational, life skills and training needs and provide opportunities for self-empowerment that will enable low- and moderate-income residents to become and remain self-sufficient and economically independent. The City seeks to support efforts to train youth and develop employment programs that will lead to livable wage job opportunities for its residents.

The ConPlan articulates the City's ongoing strategy to work with community partners to tackle issues of poverty and this Annual Action Plan provides direct funds for workforce development to address issues of poverty.

Actions planned to develop institutional structure

The City of Middletown will continue to seek opportunity to continue to improve the systemic structures in the community. Through its partnerships with public and private organizations and its continued involvement in community collaborations and initiatives, the City will continue to identify gaps and look for creative solutions to improve the system for its residents.

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

The City plans to continue its involvement in the Butler County Housing and Homeless Coalition and work with other providers to coordinate housing initiatives and social service provision. The City has been a leader in efforts to identify coordination opportunities and address in services. The City will continue to work closely with Butler County in several areas including social services, workforce development and mental health/substance use disorder services. The City will continue to seek to establish new relationships with the private sector to accomplish economic and community development activities.

Discussion

The City of Middletown's Development Services Department takes the key role for implementation and monitoring its housing and community development projects to ensure long-term compliance with program requirements and comprehensive planning requirements. The City's partnership with Community Development Professionals enhances its ability to establish strong systems and ensure there are regular and ongoing monitoring visits with sub-recipients as needed as well as desk reviews, and financial and performance monitoring on a quarterly basis.

Monitoring of all City operated projects will be done through desk reviews, periodic reviews of the Action Plan and Consolidated Plan, reviews of funding applications, and through compliance with all

applicable federal regulations.

Each housing program funded by the City of Middletown is reviewed for compliance with federal regulations such as Section 504/Handicapped Accessibility, Lead Based Paint requirements, Housing Quality Standards (IPMC), Davis-Bacon, Section 3, and other federal requirements.

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%