

Legal Notice of Public Hearing and 30-Day Comment Period on Draft 2025-2029 CDBG Consolidated Plan and PY25 Annual Action Plan

The Community & Economic Development Department will hold a public hearing on Tuesday, February 18, 2025 at 5:30pm in City Council Chambers, One Donham Plaza, Middletown, Ohio 45042 to receive comments regarding the Draft FY 2025-2029 CDBG Consolidated Plan (ConPlan) and FY 2025 Annual Action Plan (AAP) for Middletown, Ohio which includes the recommended 2025-26 budget for the Community Development Block Grant (CDBG) funds. Members of the public are invited to speak at this hearing regarding the proposed ConPlan and AAP. Copies of the draft plan will be available for thirty (30) days beginning February 19 through March 21, 2025 on the City's website, at the City building in the Community & Economic Development Department, at MidPointe Library, and at Sonny Hill Community Center. **Comments on the proposed plan will be received in writing via email to ced@cityofmiddletown.org or may be remitted to Community & Economic Development Department, Attn: CDBG ConPlan and AAP Comments, One Donham Plaza, Middletown OH 45042.** City Council will receive and consider comments or recommendations prior to approving and directing the submission of the Consolidated Plan and Annual Action Plan to the U.S. Department of Housing and Urban Development. City of Middletown, Department of Development Services.

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 conducted a thorough process of gathering input from residents, community stakeholders, partners, businesses and City staff in an effort to identify its highest priority needs and consider how the CDBG allocations could best be used to meet these needs.

The four priorities identified during the process and included in the 2025-2029 Consolidated Plan are:

- 1) Neighborhood revitalization, including improving public infrastructure, beautifying neighborhoods, code enforcement and emergency repair in LMI neighborhoods.
- 2) Supportive services that provide opportunity for Middletown residents to thrive, including services for children and youth, elderly, and wraparound services for persons experiencing homelessness.
- 3) Economic development, including business growth and development and downtown revitalization
- 4) Housing availability and affordability for LMI households including those who are unhoused.

3. Evaluation of past performance

The City has strong outcomes as a result of its past performance. In the last 5-year Consolidated Plan the City identified nine priority areas. Through strategic leveraging of funds and strong partnerships with Subrecipients the City made great strides to address priorities. Activities around public services through partnership with CBI were effective both to address activities for youth as well as workforce development activities. Fair housing awareness and education were ably met through the City's partnerships with HOME and Legal Aid and complaints were investigated and appropriately addressed. Low-income homeowners were assisted with emergency home repair through SELF and People Working Cooperatively. New homeowners have become part of the fabric of the community as a result of down payment assistance with the City's allocation of HOME funds. The City also continued to be involved in County-wide 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.

In addition, the complication of COVID-19 and the infusion of CDBG-CV funds were handled with excellence and expedience. Funds were used to support small businesses and retain employees impacted by mandated closures. Vulnerable residents most heavily impacted by COVID-19 were also served including youth and the elderly.

The performance metrics and extent of the City's accomplishments are detailed in the City's annual CAPER.

4. Summary of citizen participation process and consultation process

The City revised its Citizen Participation Plan in 2024 which clarified its approach and enhanced its ability to hear from the public and engage them for input. Public hearings are held a minimum of two times per year, per HUD regulation and the City's CPP. One public meeting was held during the finalization of the Annual Action Plan and the second is held in response to the CAPER submission. Public meetings are held at City Hall, One Donham Plaza, Middletown, Ohio. These sessions are part of a strategic effort to maximize participation by the public to the greatest extent possible. Public hearings are advertised in

the local newspaper, through letters sent to local community organizations, on the city's website and through the City's social media presence on Facebook.

The City conducted interviews and small group discussions with stakeholders and representatives from the community to solicit feedback for this Consolidated Plan. Stakeholders included representatives from educational institutions, nonprofit sector, business community and community residents. The City also disseminated a survey as a means for additional members of the community to provide feedback and participate in the planning process. Feedback received from these various strategies informed the identification of the four priorities and the subsequent development of this plan.

The City also invited community organizations to participate in the planning process by sharing their vision, initiatives and priority projects through the provision of a proposal process. Four 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. *[Enter summary of comments received during public hearing and/or written comments during public comment period.]*

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

To be added

7. Summary

The City will utilize this Consolidated Plan to guide its community development efforts over the five-year period 2025 - 2029. The four identified priorities of neighborhood revitalization, supportive services economic development, and housing availability and affordability for LMI will help the City focus efforts to maximize its CDBG funding to make the greatest impact. This plan has been developed by assessing the need and creating a plan to meet these needs in the most cost-effective, impactful and efficient manner.

The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	MIDDLETOWN	Community & Economic Development Department
HOME Administrator	BUTLER COUNTY	Community Development

Table 1– Responsible Agencies

Narrative

The Community & Economic Development Department 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 selected subrecipients to help accomplish outcomes outlined in the plan. The Community & Economic Development Department works under the direction of the City Manager and Middletown City Council.

Consolidated Plan Public Contact Information

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PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(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 of Middletown actively seeks opportunities to collaborate with initiatives, organizations, and service providers that impact the community and its residents. As part of these efforts, the City participates in the Butler County Housing and Homeless Coalition, which consists of housing providers and agencies dedicated to supporting households experiencing homelessness. A representative from the Department is invited to serve as an ex-officio member of the Coalition's Board and attend both the Board's monthly meetings and the general membership meetings. The Coalition includes a diverse range of cross-system representatives from housing, social services, behavioral health, and community action. Members include publicly funded organizations such as the 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 kept apprised of needs and coordinate efforts to meet needs in the community.

For the development of this Consolidated Plan, the City worked through community conversations, one-on-one meetings, dissemination of surveys, 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 (BoSCoC) 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 BoSCoC'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 120 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 BoSCoC. To better facilitate local coordination and planning efforts, BoSCoC 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 BoSCoC, which is comprised of Clermont, Warren and Butler Counties.

All HUD-funded providers report into the State of Ohio's Homeless Management Information System (HMIS). The community uses this system to inform its efforts to understand the extent of homelessness, 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, 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 BoSCoC. Local providers are invited to submit applications for consideration and a regional board engages with individual nonprofit partners to outline a strategy for regional services and programs.

BoSCoC Advisory Board

The Advisory Board is the primary planning body for the BoSCoC. Its members are responsible for making recommendations on policy decisions and the work of the Steering Committee. One person from Region 14 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.

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

City of Middletown
 PY25-29 Consolidated plan and PY25 Annual Action Plan

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
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Invited to participate in identification of housing needs, fair housing issues, and needed public services. Sent stakeholder survey and participated in one on one interview. Discussed coordination between mental health, homeless and economic development.
2	Agency/Group/Organization	Community Building Institute
	Agency/Group/Organization Type	Services-Children Services-Health Services-Education Services-Employment Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Completed Stakeholder survey and participated in one on one interview. Also participated in small group session with CBI staff and representatives. Discussed coordination between social service providers and community stakeholders.
3	Agency/Group/Organization	Middletown/Trenton Chamber of Commerce
	Agency/Group/Organization Type	Services-Employment Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in one-on-one interview. Invited to participate in stakeholder survey. Coordinates intersection of business leaders, community stakeholders and city revitalization efforts.

4	Agency/Group/Organization	Butler County United Way
	Agency/Group/Organization Type	Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Used local plan to inform priorities for ConPlan. Invited to complete Stakeholder survey. Organization coordinates efforts between social service providers and community stakeholders.
5	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 Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City participates with BCHHC. Representative discussed anti-poverty strategy, homelessness needs and services and needed public services. Member organizations invited to participate in Stakeholder survey and one on one interview. Coalition coordinates efforts between social service providers and community stakeholders.
6	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
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Participates in anti-poverty strategy and needed public services. Invited to complete Stakeholder survey and participated in one on one interview. Discussed coordination between social service providers and community stakeholders.
7	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
	How was the Agency/Group/Organization consulted and 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.
8	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
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Invited to complete Stakeholder survey; participated in one on one interview. Discussed coordination between housing assistance providers and community stakeholders.
9	Agency/Group/Organization	LEGAL AID
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	One-on-one meeting regarding anti-poverty needs and fair housing issues. Invited to complete Stakeholder survey. Discussed coordination between housing providers and community stakeholders.
10	Agency/Group/Organization	Middletown City Schools
	Agency/Group/Organization Type	Educational Leaders Anti-poverty Strategy Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	One-on-one meeting regarding anti-poverty needs and educational issues. Invited to complete Stakeholder survey. Discussed coordination between community civic leaders, schools and social service stakeholders.
11	Agency/Group/Organization	Downtown Middletown Inc
	Agency/Group/Organization Type	Housing Economic Development Community Revitalization
	What section of the Plan was addressed by Consultation?	Antipoverty Strategy Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	One-on-one meeting regarding anti-poverty needs and economic development. Invited to complete Stakeholder survey. Discussed coordination between downtown businesses, City and anti-poverty strategy.
12	Agency/Group/Organization	Ohio Means Jobs
	Agency/Group/Organization Type	Services-Persons with Disabilities Economic Development
	What section of the Plan was addressed by Consultation?	Anti-Poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	One-on-one meeting regarding anti-poverty needs specific to employment. Invited to complete Stakeholder survey. Discussed coordination between employers, job-readiness, workforce development and community stakeholders.
13	Agency/Group/Organization	Safety Council
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Anti-Poverty Strategy
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	One-on-one meeting regarding anti-poverty needs and housing. Invited to complete Stakeholder survey. Discussed coordination between housing providers and community stakeholders.
14	Agency/Group/Organization	Butler County Success Liaisons
	Agency/Group/Organization Type	Services - Housing Anti-Poverty Strategy Services - Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Small group meeting with liaisons regarding anti-poverty needs and housing issues. Invited to complete Stakeholder survey. Discussed coordination between schools, social service and housing providers to meet needs of youth and families.
15	Agency/Group/Organization	City Leadership Staff
	Agency/Group/Organization Type	Services-Health Services-Education Services-Employment Economic Development
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy Economic Development

How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Group session regarding ConPlan, identification of needs. Invited to complete Stakeholder survey. Discussed coordination between City and community stakeholders.
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Identify any Agency Types not consulted and provide rationale for not consulting

N/A

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?
Strategic Plan to End Homelessness	COHHIO/ODOD	BoSCoC Plan was used to inform housing and homeless priorities of ConPlan.
Middletown Master Plan	City of Middletown Planning Department	Master Plan Housing Element reflects housing priorities and objectives.
Chamber of Commerce Focus Areas	Middletown/Trenton Chamber of Commerce	Plan was used to inform ConPlan regarding needs of workforce development and business community.
City of Middletown Housing Policy	City of Middletown	Plan was used to inform ConPlan regarding priority needs for affordable housing.
United Way bold goals	Butler County United Way	Plan was used to inform ConPlan regarding priority needs for LMI households.
Butler County Consolidated Plan	Butler County Community Development	Plan was used to inform ConPlan regarding priority needs for LMI households, Housing Concerns.
Analysis of Impediments to Fair Housing Choice	Butler County Community Development	Plan was used to inform ConPlan regarding priority needs and activities related to fair housing.

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(I))

The City coordinates closely with Butler County and its Community Development Department for all issues related to affordable housing and homelessness and specifically in its role within the HOME Consortium. The City participates in monthly meetings to ensure communication and continuity of delivering planned activities. The City also coordinates efforts related to homeless services with the Ohio Department of Development and COHHIO as part of the Balance of State Continuum of Care. Overall the City seeks to coordinate efforts as appropriate with a range of public entities, including Butler County offices, other municipalities, regional and state partners in the development and execution of a range of programs and activities.

Narrative

More than 200 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.

The participation process for the Consolidated Plan included community gatherings; 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.

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

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

The City 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.

Well publicized public hearings were held on two occasions – July 15, 2024 and February 18, 2025 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, and on the city's website and Facebook page. Another public meeting was held on December 16, 2024 to discuss specifics related to the Request for Proposal process.

The City conducted fifteen individuals meetings 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 invited the public to provide feedback and participate in the planning process through a community survey. Feedback received from these opportunities informed the development of this plan.

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. Four organizations submitted projects for consideration in the PY25 budget.

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 Hearing	Non-targeted/ broad community	TBD	TBD	TBD	TBD
2	Newspaper Ad	Non-targeted/broad community	No written comments received from ad.	n/a	n/a	

Table 4– Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Many of Middletown's residents are economically challenged. The median household income in the City is \$50,457, which is 75% percent of the state average of \$67,520 and 68% of the national average of \$74,580. 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 to steady the homes in LMI neighborhoods and concentrate projects around lifting the health of the neighborhood through neighborhood revitalization is critical to improving the City's overall health and well-being.

Priority needs identified through surveys, community gatherings and individual conversations include:

- 1) Neighborhood revitalization, including improving public infrastructure, beautifying neighborhoods, code enforcement and emergency repair in LMI neighborhoods. The City has focused efforts to help low- and moderate-income homeowners stay safely housed by providing financial assistance to augment costs related to expensive but necessary maintenance and emergency repairs. This strategy has proven successful and will continue into the next Annual Action Plan.
- 2) Supportive services that provide opportunity for Middletown residents to thrive, including services for children and youth, elderly, and wraparound services for persons experiencing homelessness. Residents in the margins, including youth and children those living in low-income households, persons transitioning out of homelessness, and the elderly need some added supports to ensure they have equal opportunity. Funds will be used to support wraparound services for these vulnerable groups.
- 3) Economic development, including business growth and development and downtown revitalization. The City has strong strategies in place to bring life back to its downtown, support small businesses and encourage economic development for higher wage jobs.

- 4) Housing availability and affordability for LMI households including those who are unhoused. The City has affordable housing strategies in development to begin to bridge the gap between need and available inventory.

DRAFT

NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Public facilities and infrastructure are critical to maintain and preserve commercial and residential areas and attract new development. The City has Neighborhood Revitalization as one its key priorities in the 2025-2029 Consolidated Plan and will monitor its use of CDBG to lift LMI neighborhoods and provide stronger infrastructure.

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. The four identified priorities were a result of this process.

The Community and Economic Development Department works directly with various County and State agencies that often raise issues and concerns or make requests about improvements or conditions in the LMI 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 has historically included a focus on park and recreation facilities, street resurfacing and sidewalks.

How were these needs determined?

Needs were determined through a community engagement process that included community meetings, surveys, and public hearings with information gathered being incorporated into the Consolidated Plan.

Describe the jurisdiction's need for Public Services:

There are always more public service needs than what CDBG is able to fund. The priority need in the area of Public Services identified for this Consolidated Plan is Supportive Services – specifically services that give vulnerable groups of LMI residents -- elderly, youth and person transitioning from homelessness -- access to wraparound services to provide opportunity for them to thrive.

Middletown has more than 25 nonprofits who provide direct service to the City of Middletown residents. Nonprofits are involved in provision of basics needs such as food, clothing and shelter as well

as quality-of-life activities such as the arts and recreation. The local nonprofit sector provides excellent response to needs in the community but current funding is insufficient to meet increasing demand. The City continues to seek ways in to support the work of the nonprofit sector and come alongside their efforts to improve the lives of Middletown's residents. The RFP process that includes nonprofit subrecipients in the allocation of CDBG funds is one effort the City is making to this end.

How were these needs determined?

Needs were determined through a combination of factors including connection with local stakeholders, surveys, one-on-one interviews and the various plans used to inform the Consolidated Plan.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

In 2023 Middletown commissioned an updated Housing Study to index the housing in the City and provide data to steer housing development efforts moving forward. The study revealed that the housing market in Middletown, Ohio, presents a range of both challenges and opportunities.

Current Housing Conditions

Housing in Middletown is old with aging housing outpacing new builds and developments. Many of the blighted housing units have been demolished but single-family lots in neighborhoods remain vacant and undeveloped. Many remaining homes are in need of repair and many LMI households lack sufficient income to complete these repairs.

Housing Needs and Development Recommendations

The City needs houses both in the \$150,000 - \$250,000 range and the \$250,000 - \$400,000 range. New housing would free up lower priced-points homes and keep residents seeking larger homes in the City. There is a projected annual demand for 230 new single-family lots with homes. Income levels of residents with a maximum price point of \$150,000 to \$250,000 requires innovation and creative financing such as subsidy and financial assistance as new construction costs outpace this maximum purchase price.

MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

Introduction

The City has many non-housing community development assets. The City has its own existing water and sewer systems managed by its municipal 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 Community Event Center that houses its senior programs. Many social services providers are in the community 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. Livable wage employment is key to economic stability both for individual households and the City as a whole. Education and job training are crucial to having and keeping a competitive workforce. The City's resource partners including Butler Tech, Cincinnati State, Ohio Means Jobs and Miami University provide an abundance of opportunity for the workforce to attain certifications and education to fill private sector jobs in demand. 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 Sector	Number of Workers	Share of Workers (%)
Manufacturing	3,978	17.7
Retail Trade	3,454	15.3
Health Care and Social Assistance	3,018	13.4

Business Sector	Number of Workers	Share of Workers (%)
Arts, Entertainment, and Recreation	2,527	11.2
Construction	780	3.5
Finance, Insurance, and Real Estate	990	4.4
Information	258	1.1
Other Services	617	2.7
Professional, Scientific, and Technical Services	1,439	6.4
Transportation and Warehousing	700	3.1
Wholesale Trade	1,343	6.0
Agriculture, Mining, Oil & Gas Extraction	34	0.2
Public Administration	0	0.0
Total	22,500	100

Source: 2022 ACS

Labor Force

Population in the Civilian Labor Force	31,195
Percentage of population in the Civilian Labor Force	60.6%
Unemployment Rate	5.66%

Table 5 - Labor Force

Consolidated Plan

MIDDLETOWN

25

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	13,999	68%
30-59 Minutes	5,580	27%
60 or More Minutes	910	5%
Total	20,489	100%

Table 6 - Travel Time

Data Source: 2022 ACS

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

Manufacturing, retail and healthcare are the industries with the largest employees. The vast majority of employees live within 30 minutes of employment.

Education:

	Total	Percent
AGE BY EDUCATIONAL ATTAINMENT		
Population 18 to 24 years	5,522	(X)
Less than high school graduate	917	16.6%
High school graduate (includes equivalency)	2,218	40.2%
Some college or associate's degree	1,812	32.8%
Bachelor's degree or higher	575	10.4%
Population 25 years and over	34,103	(X)
Less than 9th grade	1,123	3.3%
9th to 12th grade, no diploma	3,640	10.7%

High school graduate (includes equivalency)	13,751	40.3%
Some college, no degree	7,081	20.8%
Associate's degree	3,013	8.8%
Bachelor's degree	3,849	11.3%
Graduate or professional degree	1,646	4.8%
High school graduate or higher	29,340	86.0%
Bachelor's degree or higher	5,495	16.1%
Population 25 to 34 years	6,600	(X)
High school graduate or higher	6,167	93.4%
Bachelor's degree or higher	1,231	18.7%
Population 35 to 44 years	6,020	(X)
High school graduate or higher	5,237	87.0%
Bachelor's degree or higher	1,083	18.0%
Population 45 to 64 years	12,451	(X)
High school graduate or higher	10,641	85.5%
Bachelor's degree or higher	1,792	14.4%
Population 65 years and over	9,032	(X)
High school graduate or higher	7,295	80.8%
Bachelor's degree or higher	1,389	15.4%

MEDIAN EARNINGS IN THE PAST 12 MONTHS (IN 2023 INFLATION-ADJUSTED DOLLARS)	
Population 25 years and over with earnings	\$39,476
Less than high school graduate	\$26,000

High school graduate (includes equivalency)	\$34,184
Some college or associate's degree	\$41,857
Bachelor's degree	\$54,286
Graduate or professional degree	\$79,327

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 balancing livable wage jobs and a readied workforce. The City continues to increase the number of livable wage jobs in the community but business owners and employers express difficulty in filling these positions.

The earnings figures in the table above 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. As reflected in the table above, 5,680 persons in the working age cohorts (18 - 65) do not have a high school diploma.

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

It is a challenge to balance employment growth with the pace of available workforce in the community. This challenge provides opportunity for the City to continue to find innovative ways of expanding its workforce development efforts and readying its residents to fill positions as they come available. While too many LMI households remain unemployed or underemployed, the City continues strategic partnerships with Ohio Means Jobs, Miami University, Cincinnati State and other community partners to train or retrain workers to ensure there is a stronger workforce and increased income among resident households. Just recently an initiative was announced called Middletown Rising which enables all LMI

residents of Middletown to receive a full scholarship to Miami Regionals. This type of innovation will lead Middletown into a readied and better prepared workforce.

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.

Ohio Means Jobs, the employment services arm of Ohio Department of Jobs and Family Services (OMJ), 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. OMJ provides its resources in Middletown through a partnership with Community Building Institute. 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.

The City's Community and Economic Development Department leads efforts around economic growth, business and workforce development initiatives. In addition the City has a strong partnership with the local Chamber of Commerce and coordinates plans around initiatives that lead toward workforce development and economic growth, particularly for LMI households.

MA-50 Needs and Market Analysis Discussion

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

No. The City does not have poverty pockets where households with multiple housing problems are concentrated. The City has identified focused areas for its reinvestment in areas where there is an intersection of housing-related issues, LMI residents and disinvestment.

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 than other census tracts.

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?

Yes. Neighborhood parks and recreational opportunities are assets in these neighborhoods.

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

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

The City continues to strive for city-wide access to broadband. Free access is available at the public library, community center and the City building.

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

The City continues to consider partnerships that add value to the residents while ensuring the best price. City Council has considered several proposals from providers to find the strongest solution to benefit the community. In general competition ensures quality service at a competitive price.

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

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

According to reports by the US Army Corp of Engineers and the National Climate Assessment, Middletown can anticipate, and is already experiencing, changes to our climate such as increased temperatures, a higher risk of flooding because of stronger storm surges, and a bigger chance of drought. This can impact wildlife, including the introduction of new species that may cause other problems, and will likely impact critical infrastructure.

The City maintains a strong commitment to staying abreast of federal and state environmental regulations and complying with HUD's Environmental Review process to ensure it is measuring impact of CDBG activities on the environment.

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

There is no immediate critical risk in the City. The City continues to monitor radon levels, educate homeowners about lead impacting older homes and consider flood plains. The City is committed to maintaining proper zoning and regulatory policy to mitigate unnecessary risk, particularly for LMI households.

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 with the vast majority of the City's census tracts qualifying as LMI areas. In 2024 the City combined its community development and economic development activities under one department to streamline and coordinate efforts to lift all residents of Middletown. The City's strategy is to leverage public and private investment to comprehensively revitalize neighborhoods, meet the social services needs of residents, strengthen core business areas such as the east end and downtown and increase homeownership.

The needs in the LMI areas are great with a focused effort using the City's allocation of CDBG funds to revitalize neighborhoods and provide supportive services to vulnerable persons. The City will leverage its other resources and partnerships to address economic development concerns and utilize HOME funds through the Butler County Consortium to address the need for down payment assistance for LMI households.

SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

Geographic Area

Table 7 - Geographic Priority Areas

1	Area Name:	Middletown LMI Target Areas
	Area Type:	LMI Target Neighborhoods
	Other Target Area Description:	LMI Target Neighborhoods
	Identify the neighborhood boundaries for this target area.	Middletown has a number of LMI target areas.
	Identify the needs in this target area.	Housing, neighborhood infrastructure and beautification.
	What are the opportunities for improvement in this target area?	Housing, neighborhood infrastructure and beautification.
	Are there barriers to improvement in this target area?	No barriers have been identified.
2	Area Name:	Citywide
	Area Type:	Local Target area
	Revital Type:	Comprehensive
	Identify the neighborhood boundaries for this target area.	The City of Middletown

General Allocation Priorities

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 City is made up of 38 individual neighborhoods. CDBG funding will be used to benefit LMI areas and/or LMI households residing in Middletown.

SP-25 Priority Needs - 91.415, 91.215(a)(2)

Priority Needs

Table 8 – Priority Needs Summary

1	Priority Need Name	Neighborhood Revitalization
	Priority Level	High
	Population	Extremely Low Income Low Income Moderate Income Large Families Families with Children Elderly
	Geographic Areas Affected	City-wide and LMI Target Neighborhoods
	Associated Goals	Housing rehab
	Description	The City will use repairs 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.
	Basis for Relative Priority	The City has a disproportionate number of homes in need of repair.
2	Priority Need Name	Supportive Services
	Priority Level	High

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	LMI Residents
	Associated Goals	Public Services
	Description	Provide supportive services to LMI residents
	Basis for Relative Priority	Provide support to vulnerable residents of Middletown, including elderly, persons experiencing homelessness, youth and children
	Priority Need Name	Economic Development
3	Priority Level	High

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Citywide
	Associated Goals	Small business MBE/WBE Business
	Description	Economic development, including business growth and development and downtown revitalization
	Basis for Relative Priority	The City is committed to ensuring economic development remains a high priority in the community.

4	Priority Need Name	Housing
	Priority Level	High

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Citywide
	Associated Goals	Affordable Housing
	Description	Housing availability and affordability for LMI households including those who are unhoused.
	Basis for Relative Priority	The City is committed to ensuring provision of creating and retaining affordable housing remains a high priority in the community.

Narrative (Optional)

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-35 Anticipated Resources - 91.420(b), 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. In addition Middletown's decreasing property values contribute to a lower income-tax base with which to serve vulnerable residents.

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 anticipated 2025 allocation amount and projecting that amount over the four remaining years covered by the Consolidated Plan.

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	Admin and Planning Housing Rehab Public Facility Improvements Public Services	709,824	0	0	709,824	2,839,296	These funds will be directed toward specific eligible activities designed to meet the outcomes outlined in the consolidated plan.

Table 9 - Anticipated Resources

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

The City is working closely with its collaborative community partners 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 state 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 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 activities.

The City also recently acquired and runs the Middletown Event Center which houses the senior activities in the City.

SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Middletown	Government	Economic Development Non-homeless special needs Planning neighborhood improvements public facilities public services	City of Middletown
Butler County Community Development	Government	Administration of HOME funds/Home Ownership	Butler County including City of Middletown
HOUSING OPPORTUNITIES MADE EQUAL (H.O.M.E.)	Non-profit organization	public services	Greater Cincinnati including City of Middletown
Legal Aid of Greater Cincinnati	Non-profit organization	public services	Greater Cincinnati including City of Middletown
COHHIO and BosCoC	Non-profit organization	Homelessness	Ohio rural communities including City of Middletown
Butler Metropolitan Housing Authority	PHA	Public Housing	Butler County including City of Middletown

Table 10 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City has ongoing partnerships with a number of local government agencies, nonprofit organizations, and businesses to ensure an adequate system of care for low- and moderate-income residents and the community at large. As the community faces persistent challenges as well as new and different issues, the City looks to grow its capacity to ensure a strong community for all of its residents. Community partners are key to making that happen.

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	
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics			
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X		
Education	X		
Employment and Employment Training	X	X	
Healthcare	X		
HIV/AIDS	X		X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	
Other			

Table 11 - 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. Coalition on Housing and Homelessness in Ohio oversees the local continuum of care under the direction of the Ohio Department of Development. 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 enters referrals into the Homeless Information Management 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.

COHHIO holds regular meetings to provide trainings, update on regulations and offer support and technical assistance. The leadership of Region 14 meets quarterly to provide information and coordinate resources. CE is a best practice across CoC systems.

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 to participate in 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.

SP-45 Goals - 91.415, 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Neighborhood Revitalization	2025	2029	Non-Housing Community Development	Middletown LMI Target Areas Citywide	Address distressed and dilapidated housing Appropriate housing for LMI households; Lack of amenities/neighborhood appeal in LMI areas	CDBG: \$1,500,000	Low/Moderate Income Housing Benefit: 500 Households Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3,500 Households
2	Supportive Services	2025	2029	Non-Housing Community Development	Citywide	Insufficient supportive services to meet need	CDBG: \$1,899,120	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3500 households Public service activities other than Low/Moderate Income Housing Benefit: 1200 Persons

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Fair Housing	2025	2029	Fair Housing	Citywide	Fair housing activities	CDBG: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit: 525 Persons Assisted

Table 12 – Goals Summary

SP-65 Lead-based Paint Hazards - 91.415, 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 City employs licensed Lead Safe Renovators. CED staff have achieved Lead Abatement Contractor certification which permits City staff to write specs for rehabilitation work involving disturbance of lead based paint surfaces.

SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)

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

The City partners with local agencies to directly address issues of poverty. Activities included in the ConPlan such as providing assistance to businesses as well as workforce development assistance in cooperation with Ohio Means Jobs and CBI are intended to address the core issue of poverty.

The overall goals of the ConPlan - whether housing-related, infrastructure-focused or public services -- all contribute to the revitalization of the community for the benefit of LMI areas and for the long-term reduction of poverty in the City.

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 prioritizes its partnership with the Chamber, SBDC, OMJ and local educational institutions to ready residents to fill the workforce development needs of businesses in the City and 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

All projects and activities included in the Annual Action Plan are vetted and approved by the City prior to implementation and/or award of funds. CDBG-funded projects and activities must be eligible and help the City achieve its intended goals and address identified priorities.

The City maintains records on all funded activities and ensures all expenses are eligible before reimbursing expense. The City requires all expenditures from City departments and subrecipients to submit a draw including source documentation and a performance report so the City can monitor performance against intended outcomes.

Annually the City conducts an on-site monitoring visit to review files and ensure the CDBG funds were used appropriately and as intended. Monitoring includes but is not limited to: proper procurement practices, minority business outreach, Section 3 applicability, Davis-Bacon applicability, and Environmental Review. This overall project monitoring is accomplished by having CDP ensure compliance, forwarding payment requests to the CED 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.

Expected Resources

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

Introduction

The City of Middletown continues to be faced with the challenging task of meeting increasing needs with fluctuating and/or decreasing federal and state resources and decreased tax revenue locally.

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 2025 allocation amount and projecting those amounts over the four remaining years covered by the Consolidated Plan.

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	709,824	0	0	709,824	2,839,296	These funds will be directed toward specific eligible activities designed to meet the outcomes outlined in the consolidated plan.

Table 13 - 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 is working closely with its strategic partners and collaborative partners 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.

The City of Middletown 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 activities.

The City also recently acquired and operates the Middletown Event Center which houses the senior activities in the City.

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	Neighborhood Revitalization	2025	2026	Non-Housing Community Development	Middletown LMI Target Areas Citywide	Address distressed and dilapidated housing Appropriate housing for LMI households; Lack of amenities/neighborhood appeal in LMI areas	CDBG: \$300,000	Low/Moderate Income Housing Benefit: 150 Households
2	Supportive Services	2025	2026	Non-Housing Community Development	Citywide	Insufficient supportive services to meet need	CDBG: \$267,860	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3500 households Public service activities other than Low/Moderate Income Housing Benefit: 250

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Fair Housing	2025	2026	Fair Housing	Citywide	Fair housing activities	CDBG: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted

Table 14 – Goals Summary

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 to support residents in Middletown. Meetings and consultations were held between representatives of the City's Community and Economic Development Department, City Departments, educational institutions, housing and social service agencies regarding the housing needs of children, elderly persons, persons with disabilities, and persons experiencing homelessness. Public input was also solicited through focus groups, public hearings, and a survey. All projects selected to receive funding meet objectives and goals set by the City to address housing and social needs.

#	Project Name
1	Neighborhood Revitalization- Home Improvement Repair Program
2	Neighborhood Revitalization - Emergency Repair Program (SELF)
3	Fair Housing – H.O.M.E.
4	Fair Housing - Legal Aid of Greater Cincinnati
5	Community Building Institute – Youth Activities
6	Supportive Services/Neighborhood Revitalization - Site Redevelopment
7	Planning/ Program Management

Table 15 – Project Information

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

1	Project Name	Neighborhood Revitalization – Home Improvement Repair Program
	Target Area	City-wide
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Necessary repairs for LMI homeowners
	Funding	CDBG: \$250,000
	Description	The City has allocated funds to help LMI homeowners with necessary repairs.
	Target Date	April 30, 2026
	Estimate the number and type of families that will benefit from the proposed activities	100 households will benefit from this activity
	Location Description	City-wide
	Planned Activities	Homeowner repairs
2	Project Name	Neighborhood Revitalization – Emergency Repair Program (SELF)
	Target Area	City-wide
	Goals Supported	Neighborhood Revitalization
	Needs Addressed	Emergency repairs for LMI homeowners
	Funding	CDBG: \$50,000
	Description	The City has allocated funds to help LMI homeowners with emergency repairs
	Target Date	April 30, 2026

	Estimate the number and type of families that will benefit from the proposed activities	50 households will benefit
	Location Description	City-wide
	Planned Activities	Emergency repairs to LMI homeowners
3	Project Name	Fair Housing - H.O.M.E.
	Target Area	Citywide
	Goals Supported	Fair Housing
	Needs Addressed	Fair housing activities
	Funding	CDBG: \$15,000
	Description	HOME will provide legal services relative to fair housing issues for LMI families.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	225 LMI households will be served.
	Location Description	Available city-wide to LMI households
	Planned Activities	Provide fair housing education and response services for LMI families.
	Target Date	
4	Project Name	Fair Housing – Legal Aid of Greater Cincinnati
	Target Area	Citywide
	Goals Supported	Fair Housing
	Needs Addressed	Fair housing activities
	Funding	CDBG: \$15,000.00
	Description	Legal services for LMI families related to fair housing concerns
	Target Date	April 30, 2026

	Estimate the number and type of families that will benefit from the proposed activities	25 LMI households will benefit from this activity.
	Location Description	Services are available to LMI households city-wide
	Planned Activities	Legal counsel related to fair housing services for LMI households.
5	Project Name	Community Building Institute – Youth Activities
	Target Area	Citywide
	Goals Supported	Supportive Services
	Needs Addressed	Insufficient youth activities
	Funding	CDBG: \$76,473
	Description	CDBG funds will be used to partner with CBI for recreational and educational youth activities
	Target Date	April 30, 2026
	Estimate the number and type of families that will benefit from the proposed activities	250 youth will benefit from this activity.
	Location Description	The services will be provided in an LMI target neighborhood but available city-wide to LMI households and youth.
	Planned Activities	Activities will be provided in LMI target area but available to LMI households city-wide.
6	Project Name	Supportive Services/Neighborhood Revitalization – Site Development
	Target Area	LMI Target Area
	Goals Supported	Supportive Services
	Needs Addressed	Insufficient supportive services for vulnerable populations
	Funding	CDBG: \$161,387

	Description	The City will invest funds in redeveloping a site in LMI Target Area to benefit LMI residents
	Target Date	April 30, 2026
	Estimate the number and type of families that will benefit from the proposed activities	3,500 LMI households will benefit from this activity.
	Location Description	LMI Target Area
	Planned Activities	Site redevelopment to benefit LMI residents
7	Project Name	Planning/ Program Management
	Target Area	Citywide Middletown LMI Target Areas
	Goals Supported	Housing revitalization Neighborhood Revitalization Public Services Fair Housing Infrastructure
	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: \$141,964
	Description	Grant admin costs

Target Date	April 30, 2026
Estimate the number and type of families that will benefit from the proposed activities	Planning and Program Admin support the goals and activities of the Annual Action Plan.
Location Description	n/a
Planned Activities	Planning and Program Admin support the goals and activities of the Annual Action Plan.

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

Neighborhood revitalization activities will be available to LMI-qualifying households throughout the City. Site development will specifically be in an LMI target area. Supportive services for youth will be available to youth city-wide but primarily provided in the Douglass Neighborhood, an LMI target area. Fair housing activities will be available to LMI-qualifying households throughout the City.

Geographic Distribution

Target Area	Percentage of Funds
City-wide or LMI Area	100%

Table 16 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

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

Introduction

The City will continue to work with its community partners to improve efficiency and impact and maximize its leveraging of CDBG funds.

Actions planned to address obstacles to meeting underserved needs

Middletown continues to struggle to meet the rising needs of residents in its community. Through partnership and strategic collaboration, the City is making progress to meet the needs of its residents while preparing for the future. Funding is limited but community partnerships with county, regional, state, and federal agencies continue to be key to meeting the needs of the underserved in the City of Middletown.

The City will use 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 outlined in the Consolidated Plan, the City will continue coordination and collaboration with local nonprofits and public partners to foster and maintain affordable housing through:

- Mortgage assistance programs (HOME funds through Butler County Consortium)
- Coordination with neighborhood networks to elaborate on the needs of the community
- Housing Revitalization Programs (home repair assistance)
- 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 works 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 and Middletown City Schools continue to work on issues of workforce development and life skills training. Miami University and Cincinnati State along with Butler Tech also are working to prepare a workforce for present and upcoming jobs in demand.

CDBG provides critical funding for LMI homeowners faced with critical repairs beyond their budgets.

This keeps neighborhoods stabilized and keeps homeowners housed. 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 ConPlan articulates the City's ongoing strategy to work with community partners to tackle 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 with COHHIO, Region 14 Planning Board as well as the local Butler County Housing and Homeless Coalition 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 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 Community and Economic Development Department will take 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 will maintain its ability to establish strong systems and ensure there are regular and ongoing monitoring visits with subrecipients 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 program funded by the City of Middletown will continue to be reviewed for compliance with federal regulations such as Section 504/Handicapped Accessibility, Lead Based Paint requirements, Environmental Regulations, Davis-Bacon, Section 3, and other federal requirements.

Program Specific Requirements

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

Introduction

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.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(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%