

**MONTGOMERY COUNTY, OHIO**  
**CONSOLIDATED ANNUAL PERFORMANCE**  
**AND EVALUATION REPORT (CAPER)**  
**FOR FISCAL YEAR 2014**  
**COVERING THE PERIOD OF OCTOBER 1, 2014-SEPTEMBER 30, 2015**

**GRANT NUMBERS AND AWARD AMOUNT**

CDBG: B-14-UC-39-0004, \$1,675,458

HOME: M-14-UC-39-0208, \$773,794

ESG: E-14-UC-39-0004, \$138,889

*This narrative provides an easier-to-read summary of what occurred in Montgomery County using FY14 HUD funds, rather than the more comprehensive CAPER submitted to HUD through the Integrated Disbursement and Information System (IDIS).*

**INTRODUCTION**

Montgomery County, Ohio, is an entitlement community located in southwest Ohio, with the county seat being Dayton and with the County having a 2014 population estimate of approximately 534,325. The cities of Dayton and Kettering both have populations in excess of 50,000 and receive their own allocations of U. S. Department of Housing and Urban Development (HUD) funding. Therefore, the bulk of the County's funds are directed toward the 28 other balance of County areas, including nine townships, six villages, and thirteen smaller cities with a population under 50,000.

The term "entitlement community" generally is based on population but may also include the principal cities of Metropolitan Statistical Areas (MSAs). The population threshold for other metropolitan cities is least 50,000; and finally qualified urban counties with populations of at least 200,000 (excluding the population of entitled cities) are entitled to receive annual grants.

HUD determines the amount of each entitlement grant by a statutory dual formula which uses several objective measures of community needs, including the extent of poverty, population, housing overcrowding, age of housing and population growth lag in relationship to other metropolitan areas

This CAPER reflects the performance and accomplishments of the Montgomery County Community Development Office during FY2014. It reflects progress made in meeting the goals and objectives outlined in the 2013-2017 Consolidated Plan and in carrying out the FY2014 Action Plan. Resources available to complete these activities include Community Development Block Grant (CDBG), HOME Investment Partnership Funds (HOME) and Emergency Solutions Grant (ESG) funds. A minimal amount of funds were expended for the Neighborhood Stabilization

Program (NSP 1-3), but were reported on in another HUD reporting system, Disaster Recovery Reporting System (DRGR). These programs were approved, and funds received, through amendments to the appropriate year Action Plans.

During the fiscal year October 1, 2014-September 30, 2015, the County effectively utilized these federal programs to undertake a variety of programs, projects and activities designed to address housing and community development needs throughout Montgomery County, exclusive of the City of Dayton and of the City of Kettering's CDBG programs. A large emphasis has been placed on housing for the homeless, reducing homelessness, demolition, housing rehabilitation, tenant-based rental assistance, and improving handicapped accessibility.

High priority housing needs for FY2014 included housing for very low-income small renter families, especially those at risk of homelessness or those already homeless. This was addressed through the use of tenant-based rental assistance. High priority was also given to housing for all other renter very low income individuals who are at risk of homelessness or who are already homeless. Assisting existing homeowners, with incomes from 51-80% AMI, was also a high priority, especially those with emergency repairs and grants, to help them remain in their homes. To address the needs of very low-income small renter families, rehabilitation of existing vacant rental units outside concentrations of low-income households occurred through County Corp's Community Housing Development Organization (CHDO) program. Primary activities for low and moderate-income existing homeowners included the rehabilitation of substandard units using a combination of loan and grant programs to assist low-income owners.

High priority non-housing community development needs for FY2014 included street and streetscape improvements; sidewalks, curbs and gutters (especially handicapped accessibility improvements); commercial revitalization; commercial/industrial infrastructure; senior center and park rehabilitations and demolition. The accomplishments of the County were consistent with the Consolidated Plan's high priority community development and housing objectives. Most of the projects outlined in the FY14 Action Plan were completed or had partial activities completed, as well as activities completed on projects that were funded in previous fiscal years.

In this report, the accomplishments of the Montgomery County's CDBG, HOME and ESG programs will be presented in a variety of ways, including project descriptions, pictures, etc. A public hearing notice was published in the [Dayton Daily News](#) on November 11<sup>th</sup>, 2015, discussing the draft CAPER being available for review and letting the public know about a public hearing scheduled on November 25 to review the CAPER and discuss performance. A summary was made available on the County's website. Copies could also be found at the Community Development Office. No comments were received.

## **SUMMARY OF RESOURCES AND ACCOMPLISHMENTS**

For FY2014 (beginning October 1, 2014), Montgomery County received the following entitlement funds from the U.S. Department of Housing and Urban Development:

Community Development Block Grant	\$ 1,675,458.00
HOME Investment Partnership	\$ 773,794.00
Emergency Solutions Grant	\$ 138,889.00
Subtotal	\$ 2,588,141.00

Though CDBG decreased by \$34,186 from FY13 to FY14, the total amount available to complete projects and activities actually increased as the HOME allocation was slightly more (\$58,997) as was the ESG allocation (\$16,844). This was a net increase of \$41,655 for Montgomery County programs. There were also prior year funds to expend, as noted below:

Prior Years CDBG and Program Income-  
Unliquidated Obligations and Uncommitted Funds \$ 3,202,059.23

**This makes the total available to spend in FY14: \$ 5,790,200.23**

Program income was estimated at \$465,000, but the actual amount received was \$318,176.20. Program income for the County’s program is generated through housing and economic loans that are made by Countycorp, the County’s nonprofit housing and economic development arm. In FY2014, program income was down significantly as the economic development portfolio program income has declined due to payoffs and reduced loan activity, and the housing program income has decreased due to primarily grants being made in the last 5-7 years. This impacted the program income estimate differing more than \$25,000.

Montgomery County continues to leverage resources available with other federal, state, local, and private dollars. HOME and CDBG dollars are generally linked to other funds, especially Housing Trust funds (a special fund generated by a portion of extra .5% sales tax in Montgomery County for housing, arts, and economic development), dollars from private lenders, low income housing tax credits, state grants or loans and private organizations. Matching requirements for HOME funds are satisfied through the Housing Trust and/or from excess match carried over from previous fiscal years, as well as state and non-profit agency funds.

The overall goals of the County’s Consolidated Plan are to principally serve lower income residents and areas of the County by providing decent housing, expanded economic opportunities, and improving the quality of life. In FY2014, Montgomery County’s CDBG program benefited 95.61% low and moderate income persons. The activities and strategies that we are implementing are making an impact on the identified needs in the Consolidated Plan, especially the high priority needs, of which a major one is the provision of affordable and decent housing for existing homeowners. Twelve (12) high priority non-housing (community development) projects were completed with CDBG funds in FY2014.

High priority community development needs are identified in the FY13-FY17 Montgomery County Consolidated Plan and area as follows:

- Street improvements
- Sidewalks, curbs and gutters (streetscape)
- Commercial revitalization
- Water/sewer improvements
- Code enforcement
- Sanitary sewer improvements
- Demolition of condemned, vacant structures
- Flood drainage improvements

In FY14, funds were expended for three street/bridge improvements in the amount of \$110,123. Streetscape improvements on one CDBG project totaled \$75,000. There was \$42,750 expended on two commercial revitalization projects, \$57,500 for one water improvement project, \$123,500 on three handicapped accessible projects, and \$74,250 on two demolition projects. High priority projects totaled \$483,123. Further details will be provided in the Community Development Block Grant Non-Housing section of this document.

Though historically many of Montgomery County's efforts to reduce poverty have been originated in 32 target areas, through a combination of infrastructure, housing, and economic development activities, in 2014 this was modified slightly, with only nine projects being completed in target areas. However, the County relies heavily on its One-Stop Job Center, a nationally recognized center, to meet the social and supportive needs of those in poverty. In 2015 and transitioning into 2016, the Job Center is undergoing some renovations to make the facility more user-friendly. The One-Stop Center houses Ohio Means Jobs Montgomery County which provides services for both employers and job seekers. Also, in 2015, Community and Economic Development (where CDBG, HOME and ESG funds are administered) and Workforce Development (at the Job Center) realigned to become Development Services. As a result of this realignment, businesses looking to grow or locate in Montgomery County can be partnered with Montgomery County residents who are looking for employment opportunities. In addition, housing and community opportunities can be leveraged and resources made known. In 2016, Montgomery County will open a new Business Solutions Center, targeted toward businesses, not necessarily employees.

Montgomery County continues to provide economic development funds for expanding businesses for the creation/retention of jobs for low and moderate-income persons. One business loan was approved in FY14 for an expanding childcare center, but the loan will not close until FY15. The City of Miamisburg and the Village of Farmersville made a tremendous impact on their downtown business districts through a grant/loan process with business owners. Improvements included primarily exterior improvements but also some interior code and ADA compliance issues. Over \$42,750 was spent. In FY15, Montgomery County will roll-out a microenterprise pilot program, with the funds being targeted to economically disadvantaged businesses, and grant funds ranging from \$2500-\$25,000. Wraparound services will be required and will include such things as business planning and financial literacy.

Housing for the homeless or those at risk of homelessness was a priority in FY14. Funds expended this fiscal year was primarily for tenant-based rental assistance.

Our grant programs are operating in a mostly timely manner. In FY14, our CDBG expenditure rate was above the 1.5 ratio, but our programs were reaching our target population. We have implemented an internal workout strategy to get our funds committed and expended more quickly. Almost all of our funds expended benefit low and moderate-income persons, with 6.28% being spent on public services, and approximately 16.75% being spent on planning and administration. This includes engineering costs, asbestos surveys, environmental activities, indirect costs, and salaries and benefits. Major activities planned for FY14 are on target or were completed. Economic development companies are continually being tracked to ensure that job creation is met. The economy is starting to bounce back locally but contractors are still providing very competitive bids. Demolition costs continued to be reasonable and often under budget, with additional blighted structures being addressed. The area where costs increased was for housing and this impacted the number of housing units addressed in FY14.

The following programs and activities describe how the goals were met in FY14.

### **SUMMARY OF HOUSING ACTIVITIES**

Housing activities include all programs, projects and activities funded through the CDBG, HOME, ESG, and NSP programs. Housing related expenditures were from the following types of projects and their activities will be detailed more in later sections of the CAPER.

- Housing Rehabilitation- Emergency Grants (CDBG)
- Housing Rehabilitation Administration (CDBG)
- Rental Rehabilitation Administration (CDBG)
- CHDO-HomeStart/County Corp (HOME)
- HOME-funded lease purchase (HOME)
- Emergency Solutions Grants (ESG)
- Housing for the Homeless (CDBG)
- Housing for Special Populations (HOME)
- Downpayment Assistance (HOME)

### **SUMMARY OF NON-HOUSING COMMUNITY DEVELOPMENT ACTIVITIES**

Non-housing community development initiatives included CDBG-funded community and economic development projects with activities including business facade improvements (\$42,750), streetscape improvements (\$75,000), street and bridge improvements, including handicapped access, (\$233,263), water improvement projects (\$57,500), senior center rehab (\$56,000), playground equipment (\$45,000), and demolition (\$74,250). These activities were completed by the Montgomery County Community Development Office or its subgrantees. All economic development loans and related servicing are administered through COUNTY CORP, a

nonprofit organization that is the economic development arm of the County. A brief summary of each project worked on in FY14 is included in this report.

**COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)**

In FY14, Montgomery County had a total CDBG budget of \$4,877,517.23, with the FY14 allocation being \$1,675,458, program income of \$318,176.26 and unexpended funds at the end of the previous year of \$3,202,059.23. Of this amount, \$2,252,503.42 was expended.

The following are specific accomplishments under the CDBG program in FY14. The format follows the list of priorities identified in the Non-Housing Community Development Needs in the County’s 2013-2017 Consolidated Plan.

**High Priority Projects (Street improvements, sidewalks, curbs and gutters, commercial revitalization, water/sewer improvements, code enforcement, sanitary sewer, flood drainage improvements, and demolition of blighted vacant structures)**

Miamisburg Public Parking Lot	\$ 75,000.00
Trotwood E. Main Street Corridor Resurfacing	\$ 65,000.00
Verona Water Tower Improvements	\$ 57,500.00
West Carrollton Frasier Paper Demo	\$ 73,600.00
Jefferson Township Scattered Site Demo	\$ 650.00
Brookville Sidewalk Ramps Handicapped Access	\$ 40,000.00
Farmersville Dean Drive Paving	\$ 32,623.00
Clayton Handicapped Access Curb Ramps	\$ 40,000.00
Riverside Valley Street Sidewalk Engineering	\$ 12,500.00
Germantown Handicapped Access	\$ 43,500.00
Miamisburg Business Enhancement	\$ 32,750.00
Farmersville Downtown Business Reinvestment	\$ 10,000.00
Subtotal	\$ 483,123.00

**Medium Priority Projects (Parks, Brownfield Redevelopment, Historic Preservation, Handicapped Accessibility, Recreational and Educational Programs, Services to the Handicapped, Childcare/Youth Services, and Senior Centers/Elderly Services)**

Englewood Senior Center Rehab	\$ 56,000.00
Moraine CF Holliday Park	\$ 45,000.00
Subtotal	\$101,000.00

**Low Priority (Street Lighting, Public Safety Services, Business Start-ups, Health programs)**

No low priority projects were completed in FY2014.

**Business Loans/Economic Development**

Business loan applications were received and approved by Countycorp and CDBG funds were committed to one business in FY14. This business is an expansion and will be closed in FY15 for \$125,000 and will create at least 4 new jobs.

## **Housing Needs**

**High Priority (Housing for low and moderate income small renter families-homeless and at risk of homelessness; housing for low and moderate income all other renter households-homeless and at risk of homelessness; and assistance to low and moderate income existing homeowners with incomes from 51-80% of AMI)**

*Housing for low and moderate income all other (non-elderly singles and unrelated individuals) renter households-homeless and at risk of homelessness were served in FY14.* Also, assistance was provided to low and moderate income existing homeowners with incomes from 51-80% of AMI.

**Owner-Occupied Rehabilitation** included 18 emergency grants in FY14, with expended amounts totaling approximately \$86,942.38. A project requested by the City of Clayton for housing rehabilitation assisted up to 5 homeowners.

## **Fair Housing**

\$ 100,000.00

A contract is entered into annually with the Miami Valley Fair Housing Center to enforce fair housing laws, educate tenants/homeowners, provide information to the housing industry, and work to prevent predatory lending. This contract is usually \$100,000. More about fair housing and the outcomes for FY14 from the Miami Valley Fair Housing Center are included on page 9. The Fair Housing Center made 284 presentations to consumers and professionals in FY14, reaching over 20,000 persons. Also during, FY14, the cities of Dayton and Kettering, and Montgomery County hired the Fair Housing Center to complete a new regional Analysis of Impediments to Fair Housing (AI). Montgomery County's share of the new AI was \$13,800 and is reflected on the Financial Summary submitted to HUD.

## **NEIGHBORHOOD STABILIZATION PROGRAM (NSP)**

During FY08, Montgomery County amended its FY08 Action Plan to receive NSP funds from HUD through the Housing and Economic Recovery Act of 2008. NSP funds were awarded, using a formula, to communities with high foreclosure rates, subprime lending ratios, and vacant structures. Montgomery County received \$5,988,000 to purchase and rehab housing units, to demolish condemned and blighted structures, to provide homebuyer assistance, and to provide housing units for persons at 50% or less of AMI. Contracts were entered into with Countycorp, DMHA, the Homeless Solutions team, and with Dr. Richard Stock, with CBER, at the University of Dayton. Expenditures and progress toward goals are reported through DRGR. A minimal amount of funds are left and will be fully expended in FY15.

## **NEIGHBORHOOD STABILIZATION PROGRAM (NSP 2)**

The County is in a consortium with Dayton, Kettering, Fairborn and DMHA for NSP 2 funds. The County's portion of NSP2 is \$9,301,145. Funds were used for purchase/rehab, strategic demolition, and low income targeted housing. The County executed a contract with CountyCorp in June 2010 to purchase additional housing units and rehab them for re-sell. This contract totaled \$4.6 million dollars. 25% was used to purchase housing for very low income persons, with the balance being used for demolition.

## **HOME PROGRAM**

The HOME grant for FY14 was \$773,794. There was 15% of the HOME funds, \$116,069.10, which was historically allocated to HomeStart, a Community Housing Development Organization (CHDO), operated by County Corp. In 2015, as a result of changes in the HOME Final Rule, County Corp became the CHDO, and will implement CHDO funds from Montgomery County and the City of Dayton. HomeStart will remain an organization but no new funds will be allocated to them. The reason why HomeStart remains a "paper organization" is because of the number of properties that are currently in their portfolio and in the name. As these properties are sold or transitioned to other nonprofits, that portfolio of and the liability to HomeStart will diminish. Administrative costs for the HOME program were budgeted at 10%. The balance went to agencies who operate programs for homeless persons and for affordable housing through a competitive process. The following are specific commitments to the HOME program in FY14, with most of the activities being 100% completed. Small amounts remained on the TBRA contracts but will be fully expended by the end of January 2016.

### **Lease/Purchase Activities**

HOMESTART (CHDO)-FY14 allocation	\$116,069.10
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### **Tenant-Based Rental Assistance**

Daybreak Shelter for Youth	\$ 40,000.00
Places, Inc.	\$ 93,776.00
YWCA	\$ 25,000.00

### **Permanent Supportive Housing Units**

Briarwood (32 units of PSH)-MVHO	\$400,000.00
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### **Downpayment Assistance**

Homeownership Center of Greater Dayton (3 completed)	\$ 50,000.00
CountyCorp (7 completed)	\$ 46,820.00

All HOME activities meet the high priorities identified for housing needs in the Consolidated Plan.

### **EMERGENCY SOLUTIONS GRANT PROGRAM**

Montgomery County received \$138,889 and committed 60% of the funds to shelter through a contract with St. Vincent DePaul for \$83,333.40. The balance of the funds were contracted with Homefull for homeless prevention and a minimal amount for administration.

In the Consolidated Plan, and through the efforts coordinated with the Homeless Solutions Policy Board, shelters have received funds for the past several years, and will inevitably receive future funds. These shelters house the most persons, serve different populations, and have the greatest need for additional funding. Matching funds are provided through the Human Services Levy, as well as additional funds from the City of Dayton and funds that the shelters secure independently from other resources. Montgomery County, the City of Dayton, homeless providers and others have developed a homeless solutions plan to end chronic homelessness in Montgomery County.

### **FAIR HOUSING**

A contract was entered into with the Miami Valley Fair Housing Center (MVFHC) for \$100,000 to provide fair housing activities, including consumer education, education of members of the housing industry and local jurisdictions, and enforcement of fair housing laws. During the program year, there were 708 complaint inquiries, 199 investigations, 2 cases were litigated, there were 23 administrative cases, and 27 files had staff conciliation. MVFHC staff screened published advertisements for any discriminatory language and continues its testing program for complaints and for random testing.

The Fair Housing Center was very busy in FY14. There were 18,193 consumers reached in FY14 with general fair housing educational programs. There were 2,416 professionals reached with general fair housing educational programs and training. Enforcement activities included filing of administrative complaints and lawsuits. Fair Lending/Anti-Predatory Lending educational workshops were also held, reaching 17,877 consumers and 607 professionals.

The Miami Valley Fair Housing Center is critical to the County as they provide comprehensive fair housing services, testing, and predatory lending solutions (more in next paragraph). As a result of their dedication to fair housing initiatives and the residents of Montgomery County, the Fair Housing Center has received a 3-year Fair Housing Initiatives Program, Private Enforcement Initiatives, Performance-Based Grant from HUD. The Fair Housing Center is in their second year of implementing this grant and are always proactive in attempting to secure additional funding to protect the housing rights of County residents.

The County requires affirmative marketing plans from all housing agencies that it funds through CDBG and HOME funds. We have found these plans to be effective in providing housing without discrimination. Montgomery County has a HOME Affirmative Marketing Strategy as well as an updated Analysis of Impediments (AI) to Fair Housing. The latest AI was completed on a regional basis, including the entitlement cities of Dayton and Kettering, and Montgomery County, by

Wright State University's Center for Urban and Public Affairs. The AI was completed in October 2015 and a new Regional Fair Housing Plan will be developed.

### **SECTION 3**

Montgomery County has a Section 3 Plan in place. During previous fiscal years, the County attended several trainings and presentations about Section 3, including meetings with HUD's Columbus Field Office Fair Housing and Equal Opportunity staff. The County also had meetings with Kettering, Dayton, Fairborn and DMHA to collaborate on Section 3. We have reviewed copies of what Dayton, Kettering and DMHA are using to meet this requirement, and will coordinate our efforts with them, when and wherever feasible. This seemed like a natural partnership as these agencies worked together on the Analysis of Impediments to Fair Housing and on the Regional Fair Housing Action Plan. Montgomery County's Purchasing Department has a Minority Economic Inclusion Policy and is working to enhance the County's outreach to minority, female, disadvantaged businesses. We are working with them to get copies of certifications and provide copies of our data to them in return.

We also include in our spec book all the appropriate forms that must be filled out by contractors. Training has become a larger part of our Section 3 efforts.

### **AFFORDABLE HOUSING**

The FY14 Action Plan proposed that 20-30 low and moderate-income homeowners would benefit from CDBG and HOME funds for owner-occupied rehabilitation in specific target areas. Actual accomplishments included the closing and disbursement of funds for 18 owner-occupied housing units (accessibility issues, lead hazard control, major rehabilitation including window replacement, plumbing, electric, siding, etc.).

Montgomery County continues to support a lease/purchase program, operated by County Corp's affiliate, HOMESTART, INC. These units provide opportunity for lower-income renters to lease a unit for up to two years while repairing damaged credit. They then become the owner of the unit once they are credit-worthy. Homestart now only has approximately 45 units for lower-income renters who will hopefully become homeowners, down from approximately 100 units four years ago. This is because roughly 60 of the housing units are now owner-occupied.

Funding in the amount of \$40,000 was provided to Daybreak in FY14 for tenant-based rental assistance for homeless youth who have been able to move from transitional housing to independent living. Funds have been committed to Daybreak since FY98, with over \$300,000 being expended for at-risk youth. Over 120 youth have been served by this program, with the average TBRA being approximately \$2000.

Places, Inc. expended funds for TBRA for homeless persons with substance abuse/mental illness (SAMI), in the amount of \$93,776 for FY14. These funds were spent at several locations, including Belvo, Tangy Court and Cobblegate and Imperial. The YWCA also received and spent funding in

the amount of \$25,000.00 for TBRA for victims of domestic violence who needed housing assistance.

Montgomery County continues, through its affiliation with nonprofit housing agencies (such as Habitat for Humanity, PWC, Rebuilding Together Dayton and CountyCorp), to work on addressing underserved needs and affordability issues. The County has a strong relationship with the Greater Dayton Premier Management and has provided funding for persons moving from rental to owner-occupied housing (30 units total). This partnership was forged when the County participated in DMHA's HOPE VI project. There are current discussions about a new Choice Neighborhood application being submitted with the County being a partner of the application being proposed by the City of Dayton and GDPM.

The County has continued to work with GDPM in their efforts to assist in the improving of public housing and resident initiatives, but no current proposals are being considered, with the exception of the Choice Neighborhood proposal. No HOME funds were available for DMHA projects in FY14.

### **Barriers to Affordable Housing**

As mentioned in the Fair Housing Section, an ongoing issue with affordability is predatory lending. There were 217 complaint inquiries to the Fair Housing Center in FY14, with 23 cases litigated and 14 workout/modifications. Numerous meetings have been held and will continue to be held to educate homeowners and potential homeowners, banks and other lenders, and members of the community about the considerable detriment that predatory lending is to affordable housing for already financially strapped homeowners.

Montgomery County has identified a few gaps in local institutional structure. One gap that was identified and that continues to be a problem is the lack of a nonprofit rental-housing agency, outside of HOMESTART. HOMESTART currently has 60+ rental units, but they do not have capacity to add substantially more units. The identification of another agency is critical to providing adequate housing for low and moderate-income renters, and the County has been exploring other alternatives. Some of this exploration has come about as a result of the Homeless Solutions Plan, the RFP that was issued for projects that met criteria for affordable permanent housing and transitional housing, and the lack of new applicants and types of projects that were submitted for consideration. MVHO does a good job with the units that they own and manage but many of these units are specifically for permanent supportive housing units. The production of new affordable housing units will be a goal in 2016.

A second gap is the lack of a comprehensive code enforcement program in Montgomery County. Many of the less affluent jurisdictions worked with the Combined Health District on code enforcement issues in the past. The Health District abolished this program and many of the townships have inadequate staff to continue these efforts. The potential consequence of this could be the continued decline of housing stock in low and moderate-income neighborhoods. CDBG funds are being utilized to demolish, where appropriate, vacant and condemned

properties. But without the Health District's assistance, the process is slowed down significantly as the process now includes townships' fire departments to make the determination about the continued viability of the housing unit.

Third, a gap which has been identified is the small number of neighborhood development corporations (NDCs) in the County's target areas. Montgomery County will continue to encourage these efforts. Though there were three neighborhood development groups that were formed as a result of the County's Neighborhood Empowerment Program, none of those groups are currently active.

There have been substantial efforts by Montgomery County and COUNTY CORP, as the County's housing non-profit to address lead-based paint hazards in housing stock built before 1978. The integration of lead-based paint hazards and rehabilitation, as required by the final rule put into place by HUD on September 15, 2000, has been successful. It has increased significantly more the administrative requirements in making a loan/grant to a low to moderate-income family a reality. Added costs include the testing of a housing unit for lead hazards, as well as the clearance requirements, and relocation for affected families. Housing staff must also explain how the lead hazards, if found, will be taken care of; the potential dangers to a child, if not controlled; the possibility that the housing unit might not be addressed if the hazards are too rampant, and the loan to value ratio of the housing unit makes the loan unfeasible.

Montgomery County submitted an application to the Office of Healthy Homes and Lead Hazard Control in July 2009 for \$3,070,000 for lead hazard controls and healthy homes interventions. This was a collaborative effort with the cities of Dayton and Kettering, Countycorp, Citywide Development Corporation, Public Health Dayton Montgomery County, Rebuilding Together, East End Community Services, and other nonprofit agencies. Funds were used for risk assessments, clearance testing, interim controls, education and outreach, and training. This grant ended in June of 2013.

Montgomery County's Analysis of Impediments Study from 2010 was updated in October 2015. The County has a strong relationship with the Miami Valley Fair Housing Center and has facilitated progress on the recommendations presented by Donald Eager and Associates in the 2004 study and in the 2010 study completed by the Fair Housing Center. The County completed its Consolidated Plan for the period FY13-FY17 and an Analysis of Impediments Study was contracted with the Fair Housing Center in 2015 for identification of housing needs within the community. This study, conducted in the Cities of Dayton and Kettering, both entitlement communities and in the balance of the County, is fairly comprehensive and consistent as the entire community is being analyzed by the same consultant.

### **CONTINUUM OF CARE NARRATIVE/HOMELESSNESS**

Montgomery County provides funds for homeless special populations, including those with substance abuse, mental illness, and at-risk youth. All these efforts are in conjunction with the County's overall Continuum of Care Plan, and the majority, if not all the funding, is included in a

combined RFP that is issued by the Office of Family and Children First. Funding sources include HOME, ESG, CDBG, Continuum of Care funds, and Human Services Levy monies.

Emergency Solutions Grant funds were provided for operating costs and essential services at the Gateway Shelters operated by St. Vincent DePaul and for homeless prevention implemented by Homefull.

Montgomery County works closely with the Homeless Solutions Policy Board to provide funds where the need is greatest. These shelters also receive funding from the City of Dayton, where they are located, and directly from the federal government.

## **ACQUISITION AND RELOCATION**

Montgomery County did not displace any households, businesses, farms or nonprofit organizations in FY14. Montgomery County's Displacement Plans and Mitigation Statement include efforts to minimize displacement and to mitigate the adverse effects of any such displacement on the affected persons, especially those who are low and moderate income. Projects that would demonstrate unnecessary displacement will not be funded. If displacement does occur as a direct result of CPD programs, those persons will receive assistance, just compensation and replacement housing as required by the Uniform Relocation Act. Those persons not subject to the Uniform Relocation Act, but displaced by CPD programs, will receive benefits as established in the County's Community Planning and Development Displacement Plan.

## **PERFORMANCE MEASUREMENT**

Montgomery County has a local performance measurement system in place but relies heavily on the reports and performance measures that are generated from IDIS. It was our understanding that a performance measurement system should have two critical components, productivity (program outcomes) and program impact. It has always been very easy to quantify our community development and housing projects, either through the number of housing units rehabilitated the amount of storm sewer pipe installed or number of manholes in a related storm drainage project. It has always been easy, as well, to track our productivity through the pace of our projects, that is, we can identify projects from previous Action Plans that are either still underway or maybe have not yet begun, and of course, timeliness is another indicator of our productivity, as Montgomery County's ratio is historically under the 1.5 required.

Program impact is a bit harder to measure as it reflects more holistically on the community through desired outcomes or in the lives of persons assisted. Montgomery County has been successful in establishing goals and knowing the inputs that are available to us in meeting those goals. Montgomery County has also been successful in carrying out activities and knowing the direct products (outputs) of our program's activities. It is difficult to measure, however, how CDBG and HOME funds truly impact a neighborhood. Neighborhoods in transition or in serious

decline are hard to measure impact. It is easier to determine how funds impact neighborhoods that have less significant socio-economic issues or projects that benefit low mod limited clientele such as homeless and/or seniors.

Providing shelter or services to a homeless person has an immediate impact on their life or providing financial assistance through HPRP to keep someone from becoming homeless. Providing a meal or companionship at a senior center for a senior is easily gauged, as the gratification is immediate and can be used often. The same cannot be said necessarily about storm drainage improvements or street resurfacing; those are often things that are taken for granted and are not items that typically inspire residents of those neighborhoods to maintain their house or lawn.

The outcomes portion of the performance measurement system has been more difficult to define and track. Montgomery County understands that HUD is defining outcomes as “benefits that result from a program and those outcomes typically relate to a change in conditions, status, attitudes, skills, knowledge, or behavior. Common outcomes could include improved quality of life for program participants, improved quality of housing stock, or revitalization of a neighborhood.” Montgomery County has identified outcomes that are specific to this area and their program, and is including our performance measures in this CAPER. This summary shows how persons were provided either new access or improved access to public facilities and infrastructure and how households benefitted from owner-occupied housing rehabilitation.