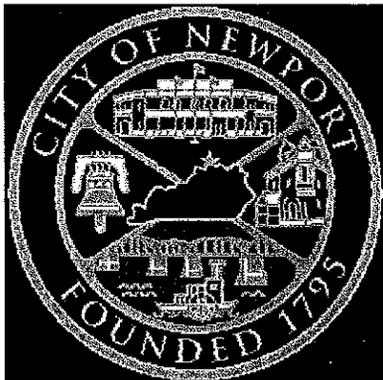
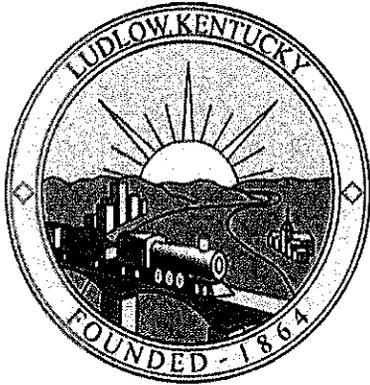


Covington, Kentucky
CONSOLIDATED PLAN
2013-17
ANNUAL ACTION PLAN
2013 – 2014



Presented to U.S. Department of Housing and Urban Development
Louisville Office of Community Planning and Development
Approved by Covington City Commission: May 7, 2013
Approved by the U.S. Department of Housing and Urban Development: July 26, 2013

2013-2018 Consolidated Plan

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Executive Summary

ES-05 Executive Summary

1. Introduction

HUD Consolidated Plan funding is the largest source of revenue for the City of Covington used to provide of needed public services, housing, economic development, neighborhood improvements, and other critical program needs.

The number one goal of this plan is to be an informative and useful tool for the residents, organizations and businesses that are committed to Covington and Northern Kentucky's continued renaissance. A secondary goal of the plan is to demonstrate to the U.S. Department of Housing and Urban Development (HUD) Covington's effective stewardship of the resources they provide. This will also be the first time that the Consolidated Plan will include the data relative to the Northern Kentucky HOME Consortium member cities of Ludlow, Newport, Bellevue and Dayton. The City of Covington is the lead agency responsible for this plan.

2013-14 Budget

Utilizing resident input, data from the 2000 and 2010 Census and other sources, and input from our nonprofit and for profit partners the City of Covington developed the following Consolidated Plan – Five Year Strategic Plan for years 2013-2018 and the Annual Action Plan for Program Year July 1, 2013 – June 30, 2014. The total budget for the Department of Development is comprised of funds that are received though and administered by HUD.

The Annual Action Plan includes a budget which encompasses revenue from four sources. These include new formula based entitlements, program income, carry-over, and 108 Loan repayments. The new formula based entitlements are \$1,444,654 in Community Development Block Grant (CDBG) funding and \$229,784 in Home Investment Partnerships (HOME) funding for Covington and \$173,343 for the Northern Kentucky HOME Consortium. The estimated program income is \$200,000 in CDBG and \$15,000 in HOME for Covington and \$20,000 for Northern Kentucky HOME Consortium. Program income is generated through the repayment of loans made through the Home Owner Rehab Program, the Homeowner Repair Program, Homebuyer Assistance and loans made through the HOME Program to non-profits who are building or renovating homes for low to moderate income home owners. The carry-over which captures funds that were budgeted but not expended in the prior year's budget is estimated to be \$0 in CDBG and \$0 in HOME for Covington. The budget reflects \$25,000 in payments received from the two economic development projects that received Section 108 loans. This is in essence a pass through. The budget also includes income that is received though our non-cash HOME match, which comes to \$50,391.

WILL ADD FUNDING CHARTS ONCE WE KNOW FUNDING LEVELS. (As long as I can turn them into jpegs.)

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

Goals and Objectives

The City of Covington and Northern Kentucky HOME Consortium FY 2013-2018 Consolidated Plan provides a framework to identify and prioritize housing and community development needs. Within this 5-year planning window the City of Covington will focus on the following objectives:

- Expand homeownership opportunities and promote self-sufficiency for low, very low, and moderate income families by providing downpayment assistance, employee assisted housing, administering a Section 8 to Homeownership Program and providing other educational materials and initiatives which assist in purchasing and maintaining a home.
- Provide financial and technical assistance to low and moderate income homeowners in need of home repairs by administering rehabilitation and repair loan programs.
- Continue to work with the Continuum of Care to address homeless concerns.
- Promote homeownership and housing opportunities for persons with special housing needs by increasing awareness and partnering with organizations who work with those households.
- Continue to support the creation and retention of the City's affordable housing stock.
- Support opportunities to enhance local public services and facilities.
- Expand and preserve the supply of safe, decent and affordable rental housing through the professional administration of the Housing Choice Voucher Program in Kenton County.
- Maintain the commitment to Historic Preservation and expand the awareness of the positive impact historic homes have in revitalizing neighborhoods.
- Encourage and strengthen partnerships with financial institutions and intermediaries, religious institutions, nonprofit and for-profit developers, nonprofit organizations, other units of local governments, state and federal agencies and elected officials to facilitate neighborhood revitalization and housing development.
- Support and expand healthy small businesses.
- Maintain a safe and attractive living environment through public improvements and appropriate streetscape.
- Support creation and retention of quality rental opportunities through the funding the production of rental units.

It is likely that within the 5-year term of this Consolidated Plan, other concerns and opportunities will be considered. The City and the Northern Kentucky HOME Consortium will make efforts to position their organizations to take advantage of these opportunities by developing core competencies in community development management and financing.

3. Evaluation of past performance

An evaluation of past performance was completed by both staff and members of a focus group of key organization and community members. Feedback was received on areas of focus, location and administration. It was echoed with multiple voices that the jurisdiction needs to focus on the downtown core. A strong downtown can revitalize and be catalytic to all areas of the jurisdiction. It is important to condense progress and build on the momentum already gathered by pending and starting projects. This activity creates buzz and will encourage positive attention.

In addition, the reorganize of jurisdiction staff was critical to align services for a more holistic approach to community development. Where before code enforcement, recreation, infrastructure and economic development were all silo departments, combining under one umbrella department has created communication and project brainstorming that would not have otherwise occurred.

In addition it was noted that clarity and consistency with program guidelines would assist to streamline use and administration of the programs themselves. It is important to market consistent messaging to the community and members of the community who utilize the programs.

4. Summary of citizen participation process and consultation process

The purpose of the Citizen Participation Plan is to encourage participation by all sectors of the community, particularly low and very low income persons, in the development of the City of Covington and the HOME Consortium Consolidated Plan and Annual Action Plan. This Plan developed goals, strategies, and funding for the use of Community Development Block Grant (CDBG) and HOME funds.

The following Citizen Participation Plan followed federal regulations, and facilitated participation throughout the Consolidated Plan development, implementation, and Consolidated Annual Performance and Evaluation Report (CAPER).

The public hearing notices were published in the Cincinnati Enquirer at least fourteen (14) days prior to the hearing. The notice included instructions for special needs populations, such as hearing, visual or mobility impaired persons to notify the City so necessary arrangements could be made for their participation.

To ensure the participation of low and very low income residents, the Housing Authorities were notified of the public hearings; and they were requested to disseminate this information to their tenants. A mailing was done to all persons, groups, and agencies to identified social, civic or public organizations serving Covington and the HOME Consortium area.

The public hearings were held during the week, after 6:00 P.M. in the architecturally barrier free meeting rooms. For those not able to attend the public hearing, minutes of the public hearing were made available.

Provisions were made to accept written comments from those not able to attend the public hearings and were included in the public hearing records.

Once the Consolidated Plan was completed, a summary was developed. This summary was published and a 30-day comment period was given to persons, groups, or agencies who wished to comment. The published summary also provided an address, contact person and phone number where comments could be directed. Citizens were also provided an opportunity to review the entire Proposed Consolidated Plan, with the summary and public notice attached, which were available for review at the Kenton County Public Library (Covington branch), Campbell County Public Library (Newport branch), Housing Authorities of Covington, Dayton and Newport, the Campbell County Department of Housing, City of Covington Housing Development Department, the City Clerk's office of each member consortium city, and were also available on the City of Covington's website. During this 30-day period, a public hearing was held before the City of Covington's Mayor and Board of Commissioners to provide a forum for persons to comment. Comments were accepted verbally at the public hearing or in writing, whichever was most convenient for the commenter.

Any complaint, view or pertinent comment that was received either verbally or in writing, was substantially responded to within a 15 day period. Comments received at the public hearing were responded to verbally unless otherwise requested by the commenter.

Copies of the Final Consolidated Plan will be made available for review at the Kenton County Public Library (Covington branch), Campbell County Public Library (Newport branch), Housing Authorities of Covington and Newport, the Campbell County Department of Housing, City of Covington Department of Development, the City Clerk's office of each member consortium city, and was also available on the City of Covington's website. Any amendments to the Plan require a 30 day public comment period and must be adopted by the Covington City Commission.

5. Summary of public comments

Please see attached documents showing public input and the responses.

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

All comments and views were accepted and responded to appropriately.

7. Summary

The jurisdiction is excited about the 2013-2018 Consolidated Plan and the 2013-2014 Action Plan. We took efforts to change the approach of this strategic effort and utilized best practices of other communities, resources at the local Field Office and the expertise of a new staffing structure. We feel that we have looked beyond the planning efforts of this federal funding to look at the jurisdiction's funding as a whole and how to more effectively utilize funding. We took into consideration future

funding issues and administration concerns to shift our programming efforts for a more sustainable approach. We look forward to being in a more proactive situation.

The Process

PR-05 Lead & Responsible Agencies

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

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

Agency Role	Name	Department/Agency
Lead Agency	COVINGTON	

Table 1 – Responsible Agencies

Narrative

The Department of Development of the City of Covington, KY administers the CDBG and HOME Programs.

Consolidated Plan Public Contact Information

Primary Contact:

Natalie Gardner

Programs and Strategic Projects Coordinator

City of Covington, KY

859-292-2313

ngardner@covingtonky.gov

PR-10 Consultation

1. Introduction

The lead agency responsible for administering programs covered by the 2013-18 Consolidated Plan is the City of Covington's Department of Development.

The City of Covington Department of Development acts as the lead agency in the Northern Kentucky HOME Consortium. Current members of the Consortium include the City of Ludlow, the City of Newport, the City of Bellevue, and the City of Dayton. Members meet to create policy, develop housing strategy and implement activities directed under the HOME program.

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

-Maintain dialogue with the United Way

-Ludlow, Covington, Newport, Bellevue, and Dayton are participating members in Southbank Partners. Southbank Partners represents a collaboration of Northern Kentucky private citizens, business leaders, local government administrators and elected officials serving as a catalyst for economic development.

-Attend meetings of Continuum of Care

Consolidated Plan

COVINGTON

2

-City of Covington was selected as one of three neighborhoods around Greater Cincinnati to participate in the planning phase of a place-based investment project which includes the United Way of Greater Cincinnati, the Greater Cincinnati Foundation, the SC Ministry Foundation and the Local Initiatives Support Corporation. Covington was chosen because it has a record of community building and cooperation and has the ability to manage high-level consensus building.

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 City of Covington stays in close contact with the Region III Continuum of Care. A City representative attends Continuum of Care meetings. Also the City works extremely closely with the Continuum of Care in administering the recently expired Homelessness Prevention and Rapid Re-housing (HPRP) grant. There was a three year term for that grant. However, the agencies in the Continuum of Care developed their programs along HPRP guidelines to better prepare them for the future of HUD homelessness funding. The City was an active participant in all parts of that process. The HPRP model is now the model for the Northern Kentucky Region III Continuum of Care agencies.

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

The City of Covington does not receive ESG funding nor does it administer HMIS.

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

Agency/Group/Organization	Agency/Group/Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
BOY'S & GIRLS'S CLUB OF NORTHERN KENTUCKY	Services-Children Regional organization	Non-Homeless Special Needs	
Northern Kentucky Independent District Health Department	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Health Agency Publicly Funded Institution/System of Care Regional organization	Homeless Needs - Chronically homeless Non-Homeless Special Needs Anti-poverty Strategy	Coordinated with the NKY Health Department on Policy, environmental and system changes to identify and track the impact of chronic disease on our residents.
HOUSING AUTHORITY OF COVINGTON	Housing PHA	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Economic Development	The Housing Authority was asked to be a part of the Consolidated Plan Focus Group to decide how to spend funds in Covington. The City works closely with the Housing Authority on the HOPE VI process occurring in the Eastside neighborhood.
Housing Opportunities of Northern Kentucky (HONK)	Housing Services-Children	Housing Need Assessment	HONK is a CHDO for the City of Covington and Northern Kentucky HOME Consortium. The Executive

Agency/Group/Organization	Agency/Group/Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
CENTER FOR GREAT NEIGHBORHOODS	Service-Fair Housing Regional organization Housing Services-Education Services-Employment Civic Leaders	Non-Homeless Special Needs Anti-poverty Strategy Housing Need Assessment Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy	Director attended the City's Focus Group meetings. HONK and the City work closely involving housing issues. Center for Great Neighborhoods (CGN) is a CHDO for the City of Covington. They attended the City's Focus Group meetings. CGN and the City work closely involving housing issues. CGN runs the Place Matters Program which leverages funds from the United Way Place based funding and the Greater Cincinnati Foundation.
Welcome House of Northern KY	Housing Services-Children Services-homeless Regional organization	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Anti-poverty Strategy	Welcome House attended the City's Focus Group meetings. The City utilized the Welcome House expertise on poverty, housing, and homeless' needs.
The Catalytic Development Funding Corp. of Northern	Regional organization Planning organization	Housing Need Assessment	The Catalytic Development Funding Corp. of Northern Kentucky attended the Focus Group meetings. The

Agency/Group/Organization	Agency/Group/Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
Kentucky	Private Sector Banking / Financing	<p>Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy</p>	<p>Catalytic Development Funding Corp. of Northern Kentucky (the Catalytic Fund) is a private sector, not for profit organization providing financing assistance and related services for developers of quality residential and commercial real estate projects in Northern Kentucky's urban cities of Ludlow, Covington, Newport, Bellevue, and Dayton (Target Area Cities). Its mission is to accelerate Northern Kentucky's urban renaissance through targeted investments in catalytic real estate development and redevelopment projects in urban neighborhoods. The organization was initiated by Vision 2015 to implement its Urban Renaissance initiative, one of the organization's 6 focus areas critical to regional economic competitiveness. The Catalytic Fund addresses the need for patient capital to support construction and/or rehabilitation of market rate housing and mixed-use real estate projects that are essential to the revitalization and repopulation of our urban communities. These projects and their sponsors are typically outside both private and public financing programs and traditional financial institutions are not flexible enough to provide these projects with sufficient capital. The Catalytic Fund provides capital via a \$10,000,000 investment fund to fill gaps between traditionally underwritten loans, developer's equity, and project costs. Although the Catalytic Fund expects</p>

Agency/Group/Organization	Agency/Group/Organization Type	What section of the Plan was addressed by Consultation?	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?
Northern Kentucky Commission on Human Rights	Service-Fair Housing Other government - State Regional organization	Housing Need Assessment Non-Homeless Special Needs Market Analysis Anti-poverty Strategy	The City and Northern Kentucky HOME Consortium work closely with the Commission on Human Rights. The Commission Field Office Supervisor attended the Focus Group meetings. Ideas expressed were included in the Action Plan. One example of which is the greenspace.
ENTRYWAY, INC.	Housing PHA Service-Fair Housing Regional organization	Housing Need Assessment Non-Homeless Special Needs	Entryway, Inc. is a CHDO for the Northern Kentucky HOME Consortium. They attend every HOME Consortium meeting and are fully engaged in housing issues.
NORTHERN KENTUCKY COMMUNITY ACTION COMMISSION-RHP	Housing Services-Children Services-Education Services-Employment Child Welfare Agency Regional organization	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy	The City works closely with the Community Action Commission (NKYCAC). NKYCAC is a member of the Region III Continuum of Care for homelessness issues. NKYCAC provides many services to members of our community.

Table 2 – Agencies, groups, organizations who participated

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

The City of Covington attempted to consult every available type of agency for input on the 2013-18 Consolidated Plan.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Northern Kentucky Area Development District	The Ten Year Plan stresses the need for affordable housing. Through the mix of public housing, Section 8 and HOME and CDBG funds in our communities, this objective is achieved.
Covington Housing Strategy	Center for Great Neighborhoods	The Housing Strategy is currently being developed in conjunction with existing plans as well as this 2013-2018 Consolidated Plan. Both plans stress that housing is a highly important economic development initiative. The 2013-18 Con Plan deals with the creation of affordable housing, the housing strategy stresses high quality housing that will lead to the revitalization of Covington, making it a place people choose to live. There are many housing needs in the community and these plans cover the proper mix for a balanced approach. The Housing Strategy is not funded by the City of Covington, but rather the Local Initiative Support Corporation.
Management Partners Report	City of Covington	HUD and the Con Plan encourage the efficient use of funds. The Management Partners Report recommended reorganizing the Community Development Department, which includes the CDBG and HOME Programs to more efficiently administer the dwindling federal funds.
Covington Center City Action Plan	City of Covington	The Con Plan and the Center City Action Plan (3CAP) both establish living sustainability, which is making our community a fully viable and attractive place to live for diverse incomes, ages, and socio-cultural characteristics. The 3CAP and Con Plan both stress increasing homeownership and promoting reinvestment of existing housing stock by preserving and rehabilitating existing housing.
Vision 2015	Vision 2015	Vision 2015 is a plan for Northern Kentucky.  The City of Covington and the Northern Kentucky HOME Consortium have representation on Vision 2015, a community planning initiative that will define the future of Northern Kentucky by producing a 10-year strategic blueprint. Covington and the HOME Consortium help implement the Vision laid forth on March 31, 2006. One of the main tenets of Vision 2015's plan is to promote regionalism. The NKY HOME Consortium accomplishes this. Also Vision 2015 promotes housing especially in the river cities of which the HOME Consortium encompasses 5 out of 6 of those cities and is focused entirely on

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
		affordable 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 Northern Kentucky HOME Consortium and City of Covington works with the following adjacent units of local government: Kenton County; Campbell County; City of Ludlow; City of Newport; City of Bellevue; City of Dayton.

Narrative

PR-15 Citizen Participation

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

Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
Internet Outreach	Non-targeted/broad community		Comments are included as an attachment to the Con Plan.	The Northern Kentucky HOME Consortium and the City of Covington did not respond to the comments from the general discussion. As you will note, the Northern Kentucky HOME Consortium and the City of Covington responded as appropriate to comments and questions received. Some concerns were raised in the form of opinions, not questions, so it was not appropriate for the Consortium or City to respond.	
Other	Minorities Persons with disabilities Non-targeted/broad community		Comments are included as an attachment to the Con Plan.	The Northern Kentucky HOME Consortium and the City of Covington did not respond to the comments from the general discussion. As you will note, the Northern Kentucky HOME Consortium and the City of Covington responded as appropriate to comments and questions received. Some concerns were raised in the form of opinions, not questions, so it was not appropriate for the Consortium or City to respond.	
Public	Non-		Comments are	The Northern Kentucky HOME Consortium and the	

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
Meeting	targeted/broad community		included as an attachment to the Con Plan.	City of Covington did not respond to the comments from the general discussion. As you will note, the Northern Kentucky HOME Consortium and the City of Covington responded as appropriate to comments and questions received. Some concerns were raised in the form of opinions, not questions, so it was not appropriate for the Consortium or City to respond.	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The priority needs were identified through the 2000 and 2010 U.S. Decennial Censuses, the 2000 and 2010 Comprehensive Housing Affordability Strategy (CHAS), data supplied by HUD and the Ten-Year Plan to End Chronic Homelessness for the Region 3 Continuum of Care planning process.

Upon the collection and analysis of all the data, priority needs, strategies and ways to measure progress were developed and incorporated into the basis for allocating resources.

As a result of the data collection from all sources, the 5-Year Consolidated Plan targets Community Development Block Grant and HOME funds towards low to-moderate income residents. This results in a geographical disbursement weighted towards less affluent communities. Additionally, the needs of certain areas also scored high relative to needs and the percentage of low to moderate-income residents.

NA-10 Housing Needs Assessment

Summary of Housing Needs

As a result of the data collection from all sources, the 5-Year Consolidated Plan targets Community Development Block Grant and HOME funds towards low to-moderate income residents. This results in a geographical disbursement weighted towards less affluent communities. Additionally, the needs of certain areas also scored high relative to needs and the percentage of low to moderate-income residents.

The basis for assigning priorities to homeowner needs is the nature of the Northern Kentucky HOME Consortium's housing stock and the financial ability of existing homeowners to preserve their homes. The housing stock is old, but not seriously damaged. With little land for new development it is important to preserve existing housing. The HOME Consortium desires to increase the homeownership rate. Financial and educational assistance are necessary to assist more low and moderate income citizens to become homeowners.

Demographics	2000 Census (Base Year)	2005-2009 ACS (Most Recent Year)	% Change
Population	43,370	74,650	72%
Households	20,448	32,902	61%
Median Income	\$0.00	\$0.00	

Table 1 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS Data
 2000 Census (Base Year)
 2005-2009 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	6,530	4,855	6,880	3,510	
Small Family Households *	2,015	1,320	2,545	7,090	
Large Family Households *	410	315	529	1,115	
Household contains at least one person 62-74 years of age	1,134	865	1,075	318	1,043
Household contains at least one person age 75 or older	900	974	690	210	539
Households with one or more children 6 years old or younger *	1,433	688	1,139	2,070	
* the highest income category for these family types is >80% HAMFI					

Table 2 - Total Households Table

Data Source: 2005-2009 CHAS

Housing Needs Summary Tables for several types of Housing Problems

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	10	15	10	55	90	0	15	10	4	29
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	85	0	4	35	124	25	0	0	0	25
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	169	55	85	30	339	0	18	40	20	78
Housing cost burden greater than 50% of income (and none of the above problems)	2,440	389	10	10	2,849	805	400	305	45	1,555
Housing cost burden greater than 30% of income (and none of the above problems)	1,010	1,170	610	25	2,815	310	600	1,300	199	2,409
Zero/negative Income (and none of the above problems)	295	0	0	0	295	95	0	0	0	95

Table 3 – Housing Problems Table

Data Source: 2005-2009 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter				Owner				Total
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	
Having 1 or more of four housing problems	2,700	460	105	135	830	425	355	69	1,679
Having none of four housing problems	2,120	2,505	2,825	885	500	1,465	3,600	2,420	7,985
Household has negative income, but none of the other housing problems	295	0	0	0	95	0	0	0	95

Table 4 – Housing Problems 2

Data Source: 2005-2009 CHAS

3. Cost Burden > 30%

	Renter				Owner				Total
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	
Small Related	1,220	444	174	1,838	319	360	754	1,433	
Large Related	300	175	64	539	0	75	95	170	
Elderly	812	305	80	1,197	459	275	240	974	
Other	1,365	664	294	2,323	340	299	530	1,169	
Total need by income	3,697	1,588	612	5,897	1,118	1,009	1,619	3,746	

Table 5 – Cost Burden > 30%

Data Source: 2005-2009 CHAS

4. Cost Burden > 50%

	Renter				Total	Owner				Total
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total		0-30% AMI	>30-50% AMI	>50-80% AMI	Total	
Small Related	985	124	0	1,109	280	105	49	434		
Large Related	230	10	0	240	0	25	0	25		
Elderly	383	115	10	508	219	145	85	449		
Other	1,040	145	0	1,185	310	135	175	620		
Total need by income	2,638	394	10	3,042	809	410	309	1,528		

Table 6 – Cost Burden > 50%

Data Source: 2005-2009 CHAS

5. Crowding (More than one person per room)

	Renter				Total	Owner				Total
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI		0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	
Single family households	244	45	70	65	424	25	18	0	43	
Multiple, unrelated family households	10	10	19	0	39	0	0	40	60	
Other, non-family households	0	0	0	0	0	0	0	0	0	
Total need by income	254	55	89	65	463	25	18	40	103	

Table 7 – Crowding information

Data Source: 2005-2009 CHAS

What are the most common housing problems?

The most common housing problems are renters and owners that have a cost burden either greater than 50% of their income and no substandard housing, not severely overcrowded and not overcrowded or renters and owners that have a cost burden greater than 30% of their income without the above mentioned problems, no substandard housing etc. The largest number of renters with a housing cost burden greater than 30% are "other" households and small related households making 0-30% of the area median income (AMI). Renting households making 0-30% of the AMI are more than double the amount of other renter households with a cost burden greater than 30% of their income.

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

Generally, the extremely low-income household, regardless of tenure type, are in the greatest need of assistance. Those persons and families that are between 0-30% of the median family income are most likely to be paying more than 30% and in a majority of the cases, even more than 50% of their gross incomes to meet their housing costs.

Tenants with both small and large families and elderly tenants are groups which receive a high priority. Extremely low-income homeowners are also given a high priority. Significant numbers of extremely low and very low homeowners reside in the HOME Consortium area. Both the modest cost of homes, when compared to other parts of the metropolitan area, and the substantial number of elderly in our population are indicators that the lower the income, the greater the need is the common finding in the Northern Kentucky HOME Consortium housing market.

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

Among renter households, the need also grows as the families' income level declines. Both Section 8 Housing Assistance and Public Housing resources are directed at the lowest end of the income scale. Increased supportive services are being directed by both government and non-profit agencies to the lowest income citizens. Supportive services are particularly important to allow those in assisted living to retain their benefits.

Obstacles to meeting underserved needs have been identified. These obstacles are the lack of adequate financial resources, the need for increased supportive services, the increasing cost of housing, the need to expand economic opportunities, the need to coordinate resources, and the need to inform households of available services.

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

Not applicable

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

Aged out of the foster care system, previously homeless, "couch surfers", come from an overcrowded household, no education or work history, pregnant or just had children.

Discussion

NA-15 Disproportionately Greater Need: Housing Problems

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

Introduction

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,845	1,300	390
White	4,050	1,060	225
Black / African American	578	188	140
Asian	0	0	0
American Indian, Alaska Native	8	0	0
Pacific Islander	30	0	0
Hispanic	40	4	15

Table 8 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2005-2009 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,660	2,195	0
White	2,390	1,960	0
Black / African American	159	130	0
Asian	0	10	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	50	70	0

Table 9 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2005-2009 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,370	4,515	0
White	2,280	4,030	0
Black / African American	78	295	0
Asian	10	15	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	10	0
Hispanic	0	100	0

Table 10 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2005-2009 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	424	3,095	0
White	389	2,895	0
Black / African American	40	75	0
Asian	0	55	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	70	0

Table 11 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2005-2009 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

In light of the housing problems in the urban core regarding our aging housing stock and our demographic breakdowns, there is no one racial or ethnic group that has a disproportionately greater need than the jurisdiction as a whole.

NA-20 Disproportionately Greater Need: Severe Housing Problems

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

Introduction

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,530	2,620	390
White	2,950	2,165	225
Black / African American	449	319	140
Asian	0	0	0
American Indian, Alaska Native	8	0	0
Pacific Islander	30	0	0
Hispanic	40	4	15

Table 12 – Severe Housing Problems 0 - 30% AMI

Data Source: 2005-2009 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	890	3,970	0
White	815	3,540	0
Black / African American	47	243	0
Asian	0	10	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	15	105	0

Table 13 – Severe Housing Problems 30 - 50% AMI

Data Source: 2005-2009 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	460	6,425	0
White	450	5,855	0
Black / African American	0	375	0
Asian	10	15	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	10	0
Hispanic	0	100	0

Table 14 – Severe Housing Problems 50 - 80% AMI

Data Source: 2005-2009 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	204	3,310	0
White	174	3,105	0
Black / African American	30	85	0
Asian	0	55	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	70	0

Table 15 – Severe Housing Problems 80 - 100% AMI

Data Source: 2005-2009 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

In light of the housing problems in the urban core regarding our aging housing stock and our demographic breakdowns, there is no one racial or ethnic group that has a disproportionately greater need than the jurisdiction as a whole.

NA-25 Disproportionately Greater Need: Housing Cost Burdens

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

Introduction

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	22,005	5,794	4,719	390
White	19,845	5,225	4,055	225
Black / African American	1,265	345	504	140
Asian	190	0	10	0
American Indian, Alaska Native	60	0	8	0
Pacific Islander	10	20	10	0
Hispanic	480	50	55	15

Table 16 – Greater Need: Housing Cost Burdens AMI

Data Source: 2005-2009 CHAS

Discussion

In light of the housing problems in the urban core regarding our aging housing stock and our demographic breakdowns, there is no one racial or ethnic group that has a disproportionately greater need than the jurisdiction as a whole.

NA-30 Disproportionately Greater Need: Discussion

Income categories in which a racial or ethnic group has disproportionately greater need

In light of the housing problems in the urban core regarding our aging housing stock and our demographic breakdowns, there is no one racial or ethnic group that has a disproportionately greater need than the jurisdiction as a whole.

Needs not previously identified

None identified at this time.

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

Census Tract 671, the Eastside neighborhood, has a minority concentration of 60.7%, up from 59% in the 2000 Census. African Americans make up 51.2% of the total. This tract is commonly known as the Eastside. Hispanics or Latinos make up 7.7% of the population of this tract.

NA-35 Public Housing

Introduction

The Housing Choice Voucher Program (Section 8) is a City responsibility and Department that is funded through the U.S. Department of Housing and Urban Development (HUD) and administered locally under the umbrella of the Consortium with the Housing Authority of Covington. Section 8 assists very low-income families, the elderly and disabled to afford decent, safe and sanitary housing in the private market. Participants find their own housing anywhere in Kenton County and it must be code compliant. The family must pay 30% of its monthly adjusted gross income for rent and utilities. The remaining contract rent amount is paid directly to the landlord on behalf of the participating family (as housing subsidy). Section 8 differs from the Housing Authority of Covington in that the Authority manages and maintains 816 physical units located in three family sites - Latonia Terrace, City Heights and Jacob Price; one exclusively elderly building - Golden Towers; and various scattered sites (Academy Flats, ESR I, ESR II, ESR III, Emery Drive, and New Site Properties).

Eligibility for a housing voucher is based on the total annual gross income and family size. In general, the family's income may not exceed 50% of median income (Family of 3 - \$31,700). By law, we must provide 75 percent of our vouchers to applicants whose incomes do not exceed 30 percent of area median income (Family of 3 - \$19,000).

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	755	0	96	0	33	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five_year, and Nursing Home Transition									

Table 17 - Public Housing by Program Type

Alternate Data Source Name:
Section 8 data
Data Source Comments:

Consolidated Plan

COVINGTON

Characteristics of Residents

	Program Type									
	Certificate	Mod-Rehab	Public Housing	Total	Project - based	Tenant - based	Special Purpose Voucher			Disabled *
							Veterans Affairs Supportive Housing	Family Unification Program		
Average Annual Income	0	0	7,520	0	0	0	0	0	0	0
Average length of stay	0	0	5	0	0	0	0	0	0	0
Average Household size	0	0	2	2	2	2	1	0	0	0
# Homeless at admission	0	0	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	110	201	20	179	2	0	0	0
# of Disabled Families	0	0	148	381	15	348	18	0	0	0
# of Families requesting accessibility features	0	0	755	0	0	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0	0	0
*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five_year, and Nursing Home Transition										

Table 18 – Characteristics of Public Housing Residents by Program Type

Alternate Data Source Name:
Section 8 data
Data Source Comments:

Race of Residents

Race	Program Type									
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Special Purpose Voucher			Disabled *
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *	
White	0	0	378	803	40	763	21	0	0	0
Black/African American	0	0	377	336	53	283	12	0	0	0
Asian	0	0	0	2	0	2	0	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	2	0	2	0	0	0	0
Other	0	0	0	13	3	10	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five_year, and Nursing Home Transition**
Table 19 – Race of Public Housing Residents by Program Type

Alternate Data Source Name:
 Section 8 Data
 Data Source Comments:

Ethnicity of Residents

Race	Program Type									
	Certificate	Mod-Rehab	Public Housing	Total	Project-based	Tenant-based	Special Purpose Voucher			Disabled *
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *	
Hispanic	0	0	14	8	2	6	0	0	0	0
Not Hispanic	0	0	741	0	94	0	33	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five_year, and Nursing Home Transition**
Table 20 – Ethnicity of Public Housing Residents by Program Type

Alternate Data Source Name:

Section 8 data

Data Source Comments:

Consolidated Plan

COVINGTON

20

Section 504 Needs Assessment

Needs of public housing tenants and applicants on the waiting list for accessible units

Waiting Lists Data – Non-Elderly Disabled Households

HAC re-examined its waiting lists characteristics to assess demand by non-elderly disabled persons. Data from HAC's waiting lists indicates that 10 non-elderly disabled persons are awaiting entry into public housing, representing 1.5% of total public housing waiting list applicants. There are another 28 non-elderly disabled persons awaiting vouchers – constituting 6% of all HCVP waiting list applicants.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

During the application process, we collect information on family income, assets and family composition. This information is verified with other local agencies, employers and financial institutions and is used to determine program eligibility and the amount of the housing assistance payment. Since the demand for housing assistance exceeds the limited resources available long waiting periods are common. Local preferences, i.e., families that are living, working or going to school in Kenton County, move ahead of other families on the list who do not qualify for any preference. Once we approve an eligible family's housing unit, the family and landlord sign a lease and at the same time the landlord and Section 8 sign a housing assistance payments contract that runs for the same term as the lease.

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

The City of Covington and the Housing Authority have been actively discussing how we provide housing for our residents, what programs and initiatives are currently being offered, and how we will address the future needs of our residents.

This process has included looking at families who are able to compete for housing in the market place based on their own financial resources and those families who because of age, disability or limited income find securing affordable housing a challenge. As a community we have long recognized the value that all households bring to the fabric of our neighborhoods and have offered a helping hand to families with housing needs.

For instance, Covington provides down payment assistance to young families, helping them purchase their first home.

Discussion

BACKGROUND/HISTORY: The Resident Services Department provides leadership and program support for Covington Public Housing programs. The Resident Services Department is funded through both federal and private grants. Federal funds are primarily channeled through the Department of Housing and Urban Development (HUD) to the Housing Authority of Covington. Private funds are channeled through our sister non-profit 501c3 organization, The Advance Network, Inc.

MISSION: The mission of the Resident Services Department is to break the cycle of generational poverty and foster economic self-sufficiency among residents living and/or being served by Covington Public Housing programs.

OBJECTIVES: The objectives of the Resident Services Department are to provide quality programming, as well as resources, to low income families to address the barriers to economic self-sufficiency. Our programs accomplish this through:

Adult Education

- By targeting high school drop outs with GED preparatory classes;
- By facilitating post secondary advancement via academic and computer enrichment classes;
- By promoting employment readiness through classes that promote personal responsibility, and links to job search services;

Youth Programming

- By offering after-school programs in safe, clean, supervised environments;
- By providing community-based hot meals for children;
- By coordinating summer camp programs so youth may experience nature;
- By fostering work readiness and work experience through summer youth employment programs

Elderly Services

- By coordinating discounted meals and pharmacy services, as well as educational and recreational opportunities, to low income senior citizens;

Free transportation and support coordination services are available as needed.

The Resident Services Department collaborates with many community organizations to serve our resident population. We sincerely thank all of our partners and their generous support in helping us build a stronger Covington community.

NA-40 Homeless Needs Assessment

Introduction

The 2013 Point In Time Counts were released April 18, 2013. They are referred to as K-Counts now. These counts are not broken out the same way as the Homeless tables below. The 2013 K-Counts for Kenton and Campbell counties are included as an attachment.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	0	122	379	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	74	0	0	0
Chronically Homeless Families	0	0	5	0	0	0
Veterans	0	0	89	0	0	0
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	0	0	1	0	0	0

Table 21 - Homeless Needs Assessment

Alternate Data Source Name:
2013 Commonwealth of Kentucky Point in Time Count
Data Source Comments:

Population includes Rural Homeless: none

Jurisdiction's Rural Homeless Population

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction

This information was not collected in the 2013 Point in Time Count.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Nature and Extent of Homelessness by Racial and Ethnic Group

The Housing Inventory Chart has not been released for 2013 yet. This section will be updated when those numbers are released.

Nature and Extent of Unsheltered and Sheltered Homelessness, including Rural Homelessness

Discussion

NA-45 Non-Homeless Special Needs Assessment

Introduction

The needs identified in the Continuum of Care (CoC) are housing and supportive services for persons with a severe mental illness, developmentally disabled, physically disabled and alcohol/other drug addicted persons. Also supportive services are needed for elderly persons.

Characteristics of Special Needs Populations

SEVERELY MENTALLY ILL PERSONS

There are more than 200 persons with long term mental illnesses in the Northern Kentucky HOME Consortium who confront a variety of housing problems. Besides housing problems related to their mental instabilities, these people face housing problems because of their low incomes. If support services were offered on a continuum of care model, designed to serve persons with minimal needs as well as those with extreme or chronic needs, one hundred percent of these persons would require supportive services in connection with their housing.

Those persons who identified themselves as suffering from some form of mental illness need affordable housing that includes support services. Many of these persons are on SSI or have very limited incomes, making them able to spend only \$100 to \$150 a month on housing. Deep subsidies would be required to develop affordable housing for this population.

ALCOHOL/OTHER DRUG ADDICTED ONLY

It is difficult to estimate the number of persons whose housing problems are due only to alcohol/drug abuse. All of the social service providers in the area report significant increases in alcohol/drug addiction problems. The Welcome House Women's Shelter identifies it as a growing problem especially among the women it serves. Fairhaven Rescue Mission, an emergency and long term transitional shelter program for men, cites the increase in alcohol/drug abuse problems. Also, due to the longer length of stay necessary for these persons in counseling programs, beds in these facilities are tied up for longer periods of time, creating long waiting lists for others seeking this assistance. Furthermore, they report an increase in the number of persons without insurance who are seeking assistance. Low income persons are often most at risk due to their lack of resources for housing or treatment. There is a need for more counseling programs for these persons, especially programs for persons with very limited incomes. Demand for these types of programs has caused many providers to limit the number it serves or place people on waiting list for the services. Transitions, Inc., based in Bellevue, serves the Alcohol

and/or drug dependant population and is working to secure funding for an alcohol or drug addiction treatment center

The Kentucky Housing Corporation provided funding for up to 10 Recovery Centers across the state, modeled on two existing centers in Louisville and Lexington. The centers will house 100 men with alcohol or drug addiction in a highly controlled, voluntary program that draws heavily on peer support. The Louisville and Lexington programs have been highly successful and are national models for recovery. However local opposition prevented the center from being located in Covington. However, with a center located in Erlanger, HOME Consortium residents would be able to utilize the facility.

Housing and Supportive Service Needs and Determination

Answer continued from above question:

SEVERELY MENTALLY ILL AND ALCOHOL/DRUG ADDICTED

There was no attempt to identify these persons and no reliable figure is available on how many persons there may be with both these problems. There is a need for more counseling programs for these persons and it is recognized that the complexity of this problem would require extensive case management and support service in order to ensure that these persons are able to remain in their housing. As mentioned above, agencies report a real increase in the number of persons suffering from these combined problems. These persons are often most at risk of homelessness due to inadequate programs to meet their needs and their inability to maintain their housing due to their problems.

DIAGNOSED WITH AIDS

The Northern Kentucky AIDS Case Management Program reports that they have seen steady increases in the number of people seeking their assistance. Housing related problems are increasing among their clients and they believe all of these clients will eventually have housing related problems. Loss of income, medical care costs and discrimination are the main factors adversely affecting their housing situation.

DISABLED

There is limited housing for the disabled. It is hard for younger disabled people to find housing because of the perception that they like to "party." There is a need for more housing for the disabled. Also, sidewalks need to be fixed as well more curb cuts should be installed. Affordability is an issue because Social Security is not enough to cover costs of owning or renting a home and the Section 8 waiting list is very long. There are 940 people currently on the Kenton County Section 8 waiting list and the wait is typically a year and a half to two years. The Newport Housing Authority operates the Section 8 program for the Cities of Newport and Bellevue. They typically have over 400 people on their waiting list. The

waiting list can be from 6 months to 1 year. Also sidewalks need to be free of debris so the physically disabled can navigate better.

Public Size and Characteristics of Population with HIV / AIDS

According to the state's HIV/AIDS Surveillance Report for 2012, of the total HIV disease cases (Total cases with HIV disease regardless of progression to AIDS, both living and deceased) there are 391 in Kenton County and 143 in Campbell County. Of the total Living with HIV the disease (Living cases regardless of current residence.

All statewide data can be found at the website: http://chfs.ky.gov/NR/rdonlyres/8CF79016-4F32-4A07-8CC0-5C891BCA6B87/0/Annual_Report_June2012.pdf

Discussion

The City of Covington and the Northern Kentucky HOME Consortium do not receive HOPWA.

Here are resources: AIDS VOLUNTEERS OF NORTHERN KENTUCKY (AVNK) PO BOX 175743 COVINGTON KY 41017 (859) 512-7925.

INFECTIOUS DISEASE CONSULTANTS 20 MEDICAL VILLAGE DR EDGEWOOD KY 41017(859) 331-1512.

NORTHERN KENTUCKY INDEPENDENT DISTRICT HEALTH DEPARTMENT 2388 GRANDVIEW DRIVE, BUILDING A, FORT MITCHELL KY 41047(859) 578-7660.

<http://www.nkyhealth.org/mx/hm.asp?id=healthservicesHIV>

NA-50 Non-Housing Community Development Needs

Public Facilities

A high priority has been assigned to Parks and Recreation facilities. All public recreational areas and parks are subject to intensive use. Periodic rehabilitation and upgrading is needed. The facilities serving the low income community, such as 15th and Eastern Park, Randolph Park, Annie Hargraves Park and Goebel Park will need improvements. Other neighborhood recreational facilities will be targeted as public input is received and as physical conditions warrant.

The Covington Recreation Department uses CDBG Public Improvements funding to maintain and repair its parks, pools and playgrounds to sustain a suitable living environment for its residents by providing fun, clean and safe recreation areas.

In order for our residents to fully utilize our playgrounds and parks, safety measures must be taken. Equipment needs to be in proper working order. Playground mulch needs to meet certain ADA regulations regarding depth and type to prevent injuries, as well as, be inclusive. Community pool and water park filtration systems need to be maintained to ensure against potential infection.

A senior center has been identified as a priority project and is slotted for the upcoming Program Year through public-private partnerships.

Other public facility needs such as youth centers, child care centers, parking facilities and other facilities have a significant need, but have been designated as medium or low priority targets.

Need Determination

These needs were based on the experience of the Recreation Department and the Programs and Strategic Projects Division of the City of Covington. Also, the Public Hearing and Focus Group stressed the need for quality greenspaces, parks and recreation facilities to improve the quality of life for current residents and to attract people to live in Covington.

Public Improvements

The highest priority for infrastructure improvements has been designated for street improvements. Street improvements have been a priority since the beginning of the Community Development Block Grant Program. Such improvements have been made in a systematic manner in the City's various target rehabilitation areas. This year the Infrastructure Improvement funds will be targeted to targeted areas to work in concert with our CDBG and HOME strategy. The activity supports and amplifies the revitalization efforts of the City's housing rehabilitation programs. Even without any direct financial assistance, property owners in these neighborhoods undertake improvements to their private

properties when they see public investment in rebuilt street and sidewalks. Property values increase in neighborhoods receiving such improvements and revitalization efforts accelerate. Given the age of the City's housing stock, it is not surprising that the abutting public streets and sidewalks often are in desperate need of improvements.

A separate issue is the maintenance and repair of the sewer laterals connecting the public system to individual structures. This cost is substantial since the laterals are often as old as the houses. The cost of these repairs has traditionally been the responsibility of the property owner. Many of the low income property owners cannot afford the repairs and City financial assistance may be needed to assist these homeowners.

Need Determination

The Department of Public Improvements determines the highest and best use of these funds for streets based on the three year rotating schedule.

Public Services

Given the socio-economic character of Covington's population, it is not surprising to find a great need for public services. A high priority has been assigned to a number of these needs.

The City has a large population of senior citizens who need various social services to maintain a reasonable living standard. On the other end of the age spectrum, the youth need many social, educational, and recreational programs to meet the challenges of the urban environment. These services for youth are needed if young people are to grow up and add to the community's strength. Child care services are vital to working parents. With an increasing awareness of the necessity to preserve and expand economic opportunities for low and moderate income citizens, it is mandatory that adequate and affordable child care services be available. Tenant/landlord counseling is needed as a priority supportive housing service to stabilize the living conditions of low and moderate income tenants.

Increased education and counseling improves relations between landlords and tenants. Stability on the part of both the landlords and tenants will assist the City in seeing that the physical condition of the housing stock is maintained and improved.

Anti-Crime Programs

Increased community awareness to combat the problem of crime benefits all citizens. The City has worked to support block watch groups and to improve police services and protection. This has improved the livability of neighborhoods, organized community support for preservation. Safe neighborhoods are vibrant growth areas.

The City funds, with CDBG funds, an anti-crime program directed at the community's CDBG target areas. These funds pay the cost of overtime for additional police patrols and an additional officer in these designated areas. Particular emphasis is placed on drug crimes, which have significantly affected some of these neighborhoods. There is an agreement with HAC for targeting the area around City Heights with HAC matching the City funding amount.

Youth Programs

The Covington Recreation Department uses CDBG Programming Funds to make programs available to Covington's youth and seniors to sustain a suitable living environment. Due to the economic status of our program participants, exposure to such programming would be otherwise unattainable. Due to this funding the city is able to provide these programs at no cost. The Covington Recreation Department is committed to providing a healthy lifestyle, and educational and recreational activities for an overall better quality of life.

Need Determination

The needs of Recreation Programming are determined by the Recreation Department of the City of Covington based on the success of these Programs. They provide a better quality of life for residents of Covington that otherwise would not have access to these very needed programs.

The need for the Anti-Crime Program is based on concerns of residents, experience of the Police Department and overall strategy of the Department of Development to make the best use of federal funds to coincide with other City development efforts.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

There are multiple things to consider when analyzing the market of the jurisdiction. Being a historic urban community offers unique character and accompanying issues. Things to consider include the housing stock, the workforce, homeless community and the community assets.

While the jurisdiction essentially has a fully developed housing stock, this stock is aging creating an even larger need to attend to maintenance and preservation. While historic preservation overlays protect these structures, it often creates cost burdens as well. As the majority of the jurisdiction is consider as low or moderate income, many of these residents suffer from a cost burden or housing problems. There is a need for subsidies to assist with these issues.

The workforce outlook is positive will require new and higher trained staff. Investment in post-secondary education or training is planned for the jurisdiction to proactive react to this future demand.

HPRP funding ended this year and assistance organizations are dedicated to thinking creatively. There are several projects for the jurisdiction that are in initial discussion to promote condensing services into one central location to share cost burdens.

Community assets continues to be subject at the heart of quality of life discussions. Outside of essential services, the jurisdiction has limited community assets.

While this analysis showcased a need on multiple levels it also provides opportunities for partnerships to eventually meet market demands.

MA-10 Number of Housing Units

Introduction

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	22,757	59%
1-unit, attached structure	1,233	3%
2-4 units	7,888	20%
5-19 units	3,501	9%
20 or more units	2,689	7%
Mobile Home, boat, RV, van, etc	494	1%
Total	38,562	100%

Table 1 – Residential Properties by Unit Number

Data Source: 2005-2009 ACS Data

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	63	0%	579	4%
1 bedroom	1,293	7%	5,776	41%
2 bedrooms	5,774	31%	4,654	33%
3 or more bedrooms	11,769	62%	2,994	21%
Total	18,899	100%	14,003	99%

Table 2 – Unit Size by Tenure

Data Source: 2005-2009 ACS Data

Number and Targeting of Units

The Code Enforcement Hardship Rehab/Repair Program targets homeowners at 50% of the area median income and will be available city-wide. The Upper Floor Residential Rent Rehab Program will be available in the downtown area to building owners with commercial space and residential units that need rehab upstairs. This Program is to bring life to the downtown, which in turn will spur economic development which will benefit all residents as well as add revenue to the city's general fund. The downtown area has a very low AMI.

Units Expected to be lost from Inventory

There will be a loss of affordable housing through the recent loss of a trailer park. The residents will be assisted by the City in their transition to locate new, affordable housing. In addition the jurisdiction

cleared 49 hazardous structures that will open up opportunities for the surrounding community based on what is needed.

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

There is always a need for more affordable housing. However the limited federal funds cause the City to be strategic with its planning and funding of projects in addition to the cost of rehab of existing structures.

Need for Specific Types of Housing

There is a low need for additional quality rental housing as demand has been increasing as young professional and empty nesters relocate to the urban core.

Discussion

MA-15 Cost of Housing

Introduction

Cost of Housing

	2000 Census (Base Year)	2005-2009 ACS (Most Recent Year)	% Change
Median Home Value	0	0	0%
Median Contract Rent	0	0	0%

Table 3 – Cost of Housing

Data Source: 2005-2009 ACS Data
 2000 Census (Base Year)
 2005-2009 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	8,317	59.4%
\$500-999	5,123	36.6%
\$1,000-1,499	411	2.9%
\$1,500-1,999	72	0.5%
\$2,000 or more	80	0.6%
Total	14,003	100.0%

Table 4 - Rent Paid

Data Source: 2005-2009 ACS Data

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	2,880	No Data
50% HAMFI	7,535	3,100
80% HAMFI	9,705	4,564
100% HAMFI	No Data	8,203
Total	20,120	15,867

Table 5 – Housing Affordability

Data Source: 2005-2009 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	445	557	740	1,025	1,129

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
High HOME Rent	489	581	752	1,007	1,045
Low HOME Rent	489	581	752	915	1,021

Table 6 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Availability of Sufficient Housing

There needs to be more rental units available to households making 30% and below of the area median family income. That number is significantly lower than the other income levels. There is also a need for more homeownership units for people making 80% and below of the area family median income.

Expected Change of Housing Affordability

The housing will be more affordable as rents decrease. However that can be at the expense of decent and safe housing. The City enacted a rental inspection program last year to combat that issue.

Rent Comparison

As part of a larger metropolitan area the jurisdiction does offer competitive rent rates and is often lower than the area median.

Discussion

MA-20 Condition of Housing

Introduction

The jurisdiction has an older housing stock which leads to the need for rehab funding. With little room for new development, there is a need to preserve the current housing stock. However due to the large population of low to moderate income families, it is difficult for them to find the resources to rehab their homes. The City hopes to alleviate this problem as best it can through programming.

Definitions

Substandard housing is defined as units that lack complete plumbing or kitchen facilities, have no source of heat and were built prior to 1940.

Substandard condition but suitable for rehabilitation is defined as substandard units which are structurally sound and where the cost of rehabilitation is economically warranted.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	4,580	24%	5,961	43%
With two selected Conditions	63	0%	302	2%
With three selected Conditions	0	0%	11	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	14,256	75%	7,729	55%
Total	18,899	99%	14,003	100%

Table 7 - Condition of Units

Data Source: 2005-2009 ACS Data

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,190	6%	397	3%
1980-1999	1,903	10%	1,411	10%
1950-1979	3,741	20%	4,375	31%
Before 1950	12,065	64%	7,820	56%
Total	18,899	100%	14,003	100%

Table 8 - Year Unit Built

Data Source: 2005-2009 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	15,806	84%	12,195	87%
Housing Units build before 1980 with children present	4,725	25%	2,232	

Table 9 – Risk of Lead-Based Paint

Data Source: 2005-2009 ACS (Total Units) 2005-2009 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 10 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

There is a need for rehabilitation because 24% of owner occupied housing has one selected condition and 43% of the rental occupied housing has one selected condition creating a need for rehab funding.

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

It is estimated that 59% of the housing units in the jurisdiction that are occupied by low or moderate income families that could contain lead-based paint hazards. The specific number of units actually containing lead-based paint is unknown due to households rehabilitating their homes and City efforts to remediate lead paint as funding has allowed.

Discussion

MA-25 Public and Assisted Housing

Introduction

The Public Housing Program is funded through the U.S. Department of Housing and Urban Development (HUD). Public housing provides very low income families, the elderly and disabled with decent, safe and sanitary housing. The family must pay 30% of its monthly adjusted gross income for rent and utilities. The Housing Authority manages and maintains over 800 units located in 2 family sites, Latonia Terrace and City Heights; one exclusively elderly building, Golden Towers and various scattered sites (Academy Flats, ESR I, ESR II, ESR III, Emery Drive and New Site Properties).

Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type				
				Total	Project-based	Vouchers		
						Tenant-based	Special Purpose Voucher	Disabled *
# of units vouchers available			854					
# of accessible units								
# of FSS participants								
# of FSS completions								
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five_year, and Nursing Home Transition								

Table 11 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Supply of Public Housing Development

Consolidated Plan

COVINGTON

Currently the Housing Authority of Covington has 813 units. The physical condition is good for the age. They are 75 years old. There are annual inspections for all units, but the Housing Authority improves units in between annual inspections for work orders, housekeeping and exterminations.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 12 - Public Housing Condition

Restoration and Revitalization Needs

Academy Flats

Academy Flats, which is located in the Peaselburg neighborhood, was an opportunity to convert a former school that was beginning to have a blighted influence into an asset to the community providing quality housing for our seniors and allowing them to age in place in the neighborhood. Academy Flats consists of 24 one bedroom apartments.

Eastside Revitalization

Upon demolition of Jacob Price Homes, Eastside Revitalization offered the Housing Authority an opportunity to build replacement housing in the surrounding neighborhood. This removed units that had a blighted influence on the East Side and replaced them with renovated units that are competitive in today's market.

New Site Properties

New Site Properties is a 19 unit scattered site development that is being funded by a \$1,750,000 loan from the City of Covington as part of the Neighborhood Stabilization Program. This development is part of the larger overall Hope VI project awarded to the Housing Authority of Covington. The majority of the properties consist of the Brighton Row II properties which was a failed LIHTC project. This development will continue the goal of the Housing Authority of Covington in revitalizing community neighborhoods by rehabbing and maintaining quality housing stock in the City of Covington.

Strategy of Improving the Living Environment of low- and moderate Income Families

Discussion

The amount of rent you pay in your Housing Authority-operated apartment will almost certainly be less than what you are paying currently. That's because we calculate your rent payment based on the amount of income in your household. In many cases we will ignore certain types of income and apply generous deductions to help reduce your monthly rent payment. The result? More money stays with your family to pay for the things you need. Below are just a few examples of rent calculations. To take advantage of this program, [click here to apply today!](#)

Young Family - Working Mother

Pay rate: \$7 / hour

Average hours / week: 24

Child support income: \$50 / week

Child care expense: \$40 / week

Number of children: 3

Total annual income: \$11,336

15% wage deduction: \$1,310

Income deduction for child care expense: \$2,080

Income deduction for minor children: \$1,440

Adjusted income: \$6,506

Adjusted income X 30% / 12 = Rent payment (including utilities): **\$163**

Senior Citizen - No Others In Household

Monthly social security benefit: \$400

Monthly medical prescription expense: \$150

Total annual income: \$4,800

Medical expense deduction: \$1,656

Senior Citizen deduction: \$400

Adjusted income: \$2,744

Adjusted income X 30% / 12 = Rent payment (including utilities): **\$69**

MA-30 Homeless Facilities

Introduction

We will not have the numbers for the Table below until the Housing Inventory Chart comes out. The numbers have still not been released as of June 2013.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds Current & New	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds		Current & New	Under Development
Households with Adult(s) and Child(ren)	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0

Table 13 - Facilities Targeted to Homeless Persons

Data Source Comments:

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

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

There are many programs that will be using McKinney-Vento Homeless Assistance. Transitions, Inc. will use McKinney-Vento funds for three programs. Transitions Willow Run Project, Transitions Affordable Housing Project, and the Transitions Homeless Services Project. The Willow Run Project provides transitional housing to homeless individuals in Covington. The Affordable Housing Project provides permanent supportive housing to 12 homeless individuals in Covington. This is one of only a small number of projects classified as permanent housing for persons with disabilities. The Homeless Services Project is a services-only project based in Covington that provides transitional housing with intensive case management, outreach, employment services, psychiatric nursing services, mental health case management, and life skills assistance. NorthKey Community Care will use McKinney-Vento funds for its NorthKey Rental Subsidy Program which is a permanent housing program for homeless and disabled. Permanent housing is a top priority for this region. Welcome House of Northern Kentucky, Inc. will use McKinney-Vento funds for its Gaining Access to Programs and Services which is a collaborative supportive services-only grant which serves homeless individual women and families with children that addresses complex, multiple needs through outreach and assessment, crisis intervention, coordination of services, collaborative effort to stabilize families and addresses factors contributing to homelessness. The funds pay for case management, housing counseling, life skills education, childcare, employment services, substance abuse treatment, transportation and housing assistance.

MA-35 Special Needs Facilities and Services

Introduction

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

The supportive needs are Section 504 compliant sidewalks, due to their limited income would need deep subsidies and services nearby.

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

There was no attempt to identify these persons and no reliable figure is available on how many persons there may be with both these problems. There is a need for more counseling programs for these persons and it is recognized that the complexity of this problem would require extensive case management and support service in order to ensure that these persons are able to remain in their housing. As mentioned above, agencies report a real increase in the number of persons suffering from these combined problems. These persons are often most at risk of homelessness due to inadequate programs to meet their needs and their inability to maintain their housing due to their problems.

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

The needs identified in the Continuum of Care (CoC) are housing and supportive services for persons with a severe mental illness, developmentally disabled, physically disabled and alcohol/other Drug addicted persons. Also supportive services are needed for elderly persons. The City of Covington is working closely with the Region III Continuum of Care in developing a plan for the Non-Homeless Special Needs population. As the Continuum of Care process evolves, more statistically accurate information will be available for future plans.

There are more than 200 persons with long term mental illnesses in the Northern Kentucky HOME Consortium who confront a variety of housing problems. Besides housing problems related to their mental instabilities, these people face housing problems because of their low incomes. If support services were offered on a continuum of care model, designed to serve persons with minimal needs as

well as those with extreme or chronic needs, one hundred percent of these persons would require supportive services in connection with their housing.

Those persons who identified themselves as suffering from some form of mental illness need affordable housing that includes support services. Many of these persons are on SSI or have very limited incomes, making them able to spend only \$100 to \$150 a month on housing. Deep subsidies would be required to develop affordable housing for this population.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

It is difficult to estimate the number of persons whose housing problems are due only to alcohol/drug abuse. All of the social service providers in the area report significant increases in alcohol/drug addiction problems. The Welcome House Women's Shelter identifies it as a growing problem especially among the women it serves. Fairhaven Rescue Mission, an emergency and long term transitional shelter program for men, cites the increase in alcohol/drug abuse problems. Also, due to the longer length of stay necessary for these persons in counseling programs, beds in these facilities are tied up for longer periods of time, creating long waiting lists for others seeking this assistance. Furthermore, they report an increase in the number of persons without insurance who are seeking assistance. Low income persons are often most at risk due to their lack of resources for housing or treatment. There is a need for more counseling programs for these persons, especially programs for persons with very limited incomes. Demand for these types of programs has caused many providers to limit the number it serves or place people on waiting list for the services. Transitions, Inc., based in Bellevue, serves the Alcohol and/or drug dependant population and is working to secure funding for an alcohol or drug addiction treatment center. The Kentucky Housing Corporation provided funding for up to 10 Recovery Centers across the state, modeled on two existing centers in Louisville and Lexington. The centers will house 100 men with alcohol or drug addiction in a highly controlled, voluntary program that draws heavily on peer support. The Louisville and Lexington programs have been highly successful and are national models for recovery. However local opposition prevented the center from being located in Covington. However, with a center located in Erlanger, HOME Consortium residents would be able to utilize the facility.

There is limited housing for the disabled. It is hard for younger disabled people to find housing because of the perception that they like to "party." There is a need for more housing for the disabled. Also, sidewalks need to be fixed as well more curb cuts should be installed. Affordability is an issue because Social Security is not enough to cover costs of owning or renting a home and the Section 8 waiting list is very long. There are 940 people currently on the Kenton County Section 8 waiting list and the wait is typically a year and a half to two years. The Newport Housing Authority operates the Section 8 program for the Cities of Newport and Bellevue. They typically have over 400 people on their waiting list. The waiting list can be from 6 months to 1 year. Also sidewalks need to be free of debris so the physically disabled can navigate better.

MA-40 Barriers to Affordable Housing

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City of Covington passed a Human Rights Ordinance, one of only three cities in the state of Kentucky.

The ordinance protects people from discrimination in "housing, employment and public accommodations based on race, color, religion, national origin, sex, age, sexual orientation or gender identity, family status, marital and/or parental status, and place of birth as protective categories to make it a more universal ordinance.

Definitions of sexual orientation and gender identity were modeled after human rights ordinances in Lexington and Louisville. Under sexual orientation, those ordinances protect someone "based upon his or her imputed heterosexuality, homosexuality or bisexuality." Gender identity refers to protections for someone who has "a gender identity as a result of a sex change, surgery or manifesting, for reasons other than dress, an identity not traditionally associated with one's biological maleness or femaleness."

A Bill that has, as of March 14, 2013, been passed by the Kentucky House and is headed to the Senate could give protection to those who oppose Covington's Human Rights Ordinance protection from following it on religious grounds.

MA-45 Non-Housing Community Development Assets

Introduction

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	50	0	0	0	0
Arts, Entertainment, Accommodations	2,467	1,612	12	11	-1
Construction	1,035	3,074	5	21	16
Education and Health Care Services	3,457	2,964	17	21	4
Finance, Insurance, and Real Estate	1,866	370	9	3	-6
Information	442	235	2	2	0
Manufacturing	2,382	681	12	5	-7
Other Services	800	675	4	5	1
Professional, Scientific, Management Services	2,400	1,268	12	9	-3
Public Administration	1,139	1,525	6	11	5
Retail Trade	2,398	1,460	12	10	-2
Transportation and Warehousing	1,351	217	7	2	-5
Wholesale Trade	522	360	3	2	-1
Total	20,309	14,441	--	--	--

Table 15 - Business Activity

Data Source: 2005-2009 ACS (Workers), 2010 ESRI Business Analyst Package (Jobs)

Labor Force

Total Population in the Civilian Labor Force	22,120
Civilian Employed Population 16 years and over	20,309
Unemployment Rate	8.19
Unemployment Rate for Ages 16-24	32.37
Unemployment Rate for Ages 25-65	4.69

Table 16 - Labor Force

Data Source: 2005-2009 ACS Data

Occupations by Sector

Management, business and financial	5,961
Farming, fisheries and forestry occupations	47
Service	3,842
Sales and office	5,817
Construction, extraction, maintenance and repair	1,559
Production, transportation and material moving	3,083

Table 17 – Occupations by Sector

Data Source: 2005-2009 ACS Data

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	14,966	77%
30-59 Minutes	3,894	20%
60 or More Minutes	486	3%
Total	19,346	100%

Table 18 - Travel Time

Data Source: 2005-2009 ACS Data

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,965	214	1,605
High school graduate (includes equivalency)	5,645	544	2,199

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Some college or Associate's degree	5,196	272	1,412
Bachelor's degree or higher	4,387	99	512

Table 19 - Educational Attainment by Employment Status

Data Source: 2005-2009 ACS Data

Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	82	116	120	794	1,126
9th to 12th grade, no diploma	725	765	777	1,212	938
High school graduate, GED, or alternative	1,295	2,414	2,043	3,931	1,508
Some college, no degree	1,116	1,663	1,443	2,113	507
Associate's degree	177	571	466	624	74
Bachelor's degree	365	1,490	619	1,363	184
Graduate or professional degree	64	456	351	719	97

Table 20 - Educational Attainment by Age

Data Source: 2005-2009 ACS Data

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	22,262
High school graduate (includes equivalency)	25,752
Some college or Associate's degree	31,276
Bachelor's degree	43,863
Graduate or professional degree	49,779

Table 21 – Median Earnings in the Past 12 Months

Data Source: 2005-2009 ACS Data

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

The major employment sectors within our jurisdiction are education, healthcare and construction.

Describe the workforce and infrastructure needs of the business community:

According to the Jobs Outlook Report recently published by Vision 2015, the local 10-year strategic planning agency for all of Northern Kentucky, our economy is projected to a potential 338,632 job openings over the decade. These jobs will require training beyond high school. Investments and creative partnerships between the education sector and the business sector continue to look how to properly train and educate our workforce.

Infrastructure will continue to be a need. The older city with limiting capacity for infrastructure development will require an investment in maintaining and improving existing infrastructure. One key area for potential growth is information technology.

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

Major investments in the region in both technology and healthcare will create large workforce needs. In addition, the realignment of the Brent Spence Bridge and Interstate 71 and 75, which is a main connector between the North and South with nearly 50% of the US GDP traveling it, will cause infrastructure impacts during construction.

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

Currently, there is a gap in the qualifications of our workforce and the employment opportunities.

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

By 2020, 50% of all job openings will require some combination of post-secondary credentials, on the job training and work experience beyond one year. Right now Gateway Community and Technical College will be investing nearly \$82 million investment to create an urban campus and increasing enrollment by 5,000 new students by 2020. This investment will be in the City of Covington and will not only attract new businesses to the area, but also create a more qualified workforce.

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

Yes

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.

Through regional allies we are part of the CEDS process. The City of Covington has undergone reorganizing our economic incentives, identifying key development opportunities and are utilizing a business retention module as part of a regional effort.

Discussion

MA-50 Needs and Market Analysis Discussion

Are there any populations or households in areas or neighborhoods that are more affected by multiple housing problems?

There is no true concentration of households with multiple housing problems in our jurisdiction. Housing problems and issues are spread throughout evenly.

Are there areas in the Jurisdiction where these populations are concentrated?

Census Tract 671 is the area with the highest concentration of racial minorities in the jurisdiction. Low income families are not concentrated, they are spread evenly throughout the jurisdiction.

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

The housing market is old housing stock. New development is limited. The houses pose rehab and lead based paint issues. The costs to rehab these historic homes can be cost-prohibitive for the income levels of our population.

Are there any community assets in these areas/neighborhoods?

There are neighborhood parks spread throughout the jurisdiction. Most neighborhoods are in close proximity to a bus line. There are a number of school systems based in the cities of the Northern Kentucky HOME Consortium. There are limited assets outside of essential services.

Are there other strategic opportunities in any of these areas?

There are multiple strategic plans that offer one to five year implementation tracks that would greatly improve the community assets of all of our neighborhoods as well as improvements to our housing stock.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

HUD Consolidated Plan funding is the largest source of revenue for the City of Covington used to provide of needed public services, housing, economic development, neighborhood improvements, and other critical program needs.

The number one goal of this plan is to be an informative and useful tool for the residents, organizations and businesses that are committed to Covington and Northern Kentucky's continued renaissance. A secondary goal of the plan is to demonstrate to the U.S. Department of Housing and Urban Development (HUD) Covington's effective stewardship of the resources they provide. This includes the programs relative to the Northern Kentucky HOME Consortium member cities of Ludlow, Newport, Bellevue and Dayton. The City of Covington is the lead agency responsible for this plan.

SP-10 Geographic Priorities

Geographic Area

1. Area Name:

Area Type:

Identify the neighborhood boundaries for this target area.

Include specific housing and commercial characteristics of this target area.

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

Identify the needs in this target area.

What are the opportunities for improvement in this target area?

Are there barriers to improvement in this target area?

Table 1 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the state

Targeting of funding and activities to specific neighborhoods is proposed for the upcoming program year. Focused efforts will allow for visible impacts in neighborhoods through a combination of loans and grants to homebuyers, homeowners, and businesses. Current programs will be tweaked to provide for focusing the programs into specific neighborhoods, and new programs are proposed that will provide for a variety of activities. The Programs that will be targeted to the Downtown/Core Area are the Upper Floor Residential Rent Rehab Program and the Business First Program. The Downtown/Core area has almost the same boundaries of the Neighborhood Revitalization Strategy Area.

In December of 2006, the City of Covington received an NRSA designation from the U.S. Department of Housing and Urban Development (HUD) for four Census Tracts (603, 607, 670, and 671) in the urban core to allow for greater flexibility in the way that CDBG funds are spent in this area. In the 2013-14 Program Year, the City of Covington will be targeting CDBG and HOME funds and Programs in the NRSA area. This will allow for the impact of the funds to be maximized. While the NRSA was approved in December 2006, it is the intent of the jurisdiction to continue this effort and will be working with the local Field Office.

The NRSA area encompasses the Central Business District and its surrounding neighborhoods. These neighborhoods include Mainstrasse, which is a combination of residential structures and entertainment; Mutter Gottes, Seminary Square and Licking Riverside which are predominately residential in nature;

and, the Eastside which encompasses a mixture of commercial and residential uses. The Eastside is also recognized as the historic and current home of Covington's African-American Community.

The NRSA area is contiguous and is roughly bounded by the Ohio River to the North, the Licking River to the East, I-71/I-75 to the West, and to the South by 13th Street on the west side of the railroad right-of-way and by 15th Street on the east side of the right-of-way.

The fifth operating year of the Northern Kentucky HOME Consortium took place in the 2012-13 Program Year, which was comprised of the City of Covington working through an Interlocal Agreements with the cities of Ludlow, Newport, Bellevue and Dayton. This program continues to bring much-needed HOME dollars for affordable housing that these communities traditionally did not receive. This HOME Consortium remains the only one in Kentucky. The third year of the second term of operating under a new Interlocal Agreement will be the 2013-14 Program Year, and it is anticipated that the programs operated with these communities will continue to be successful.

SP-25 Priority Needs

Priority Needs

Priority Need Name	Priority Level	Population	Goals Addressing
All Programs	High	Extremely Low Low Moderate Families with Children Elderly	Upper Floor Residential Rent Rehab Program Business 1st Grant Program Covington Homebuyer Assistance Program NKY HOME Consortium Homebuyer Assistance Program Section 108 Hope VI Repayment Streets, Playgrounds, Greenspace Code Enforcement Hardship Rehab/Repair Economic Development Technical Assistance Crime Prevention Recreation Programs Code Enforcement Staff Place Matters CDBG Program Staff Business Development Staff CDBG Administration Covington CHDO Development Projects HOME Program Staff HOME Administration NKY HOME Consortium CHDO Development Projects NKY HOME Consortium Program Staff NKY HOME Consortium Administration Relocation Interim Assistance

Table 2 – Priority Needs Summary

Narrative (Optional)

As a result of the data collection from all sources, the 5-Year Consolidated Plan targets Community Development Block Grant and HOME funds towards low to-moderate income residents. This results in a

geographical disbursement weighted towards less affluent communities. Additionally, the needs of certain areas also scored high relative to needs and the percentage of low to moderate-income residents.

Generally, the extremely low-income household, regardless of tenure type, are in the greatest need of assistance. Those persons and families that are between 0-30% of the median family income are most likely to be paying more than 30% and in a majority of the cases, even more than 50% of their gross incomes to meet their housing costs.

Tenants with both small and large families and elderly tenants are groups which receive a high priority. Extremely low-income homeowners are also given a high priority. Significant numbers of extremely low and very low homeowners reside in the HOME Consortium area. Both the modest cost of homes, when compared to other parts of the metropolitan area, and the substantial number of elderly in our population are indicators that the lower the income, the greater the need is the common finding in the Northern Kentucky HOME Consortium housing market.

The basis for assigning priorities to homeowner needs is the nature of the Northern Kentucky HOME Consortium's housing stock and the financial ability of existing homeowners to preserve their homes. The housing stock is old, but not seriously damaged. With little land for new development it is important to preserve existing housing. The HOME Consortium desires to increase the homeownership rate. Financial and educational assistance are necessary to assist more low and moderate income citizens to become homeowners.

The income profile of the population in the Northern Kentucky HOME Consortium indicates that the majority of residents are of low and moderate income. The needs of the various income groups grow as the income level decreases (e.g.-moderate, low, very low, extremely low). Hence, the HOME Consortium finds more needs among those households with the least income.

SP-30 Influence of Market Conditions

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	City of Covington and Northern Kentucky HOME Consortium do not plan to use HOME for TBRA.
TBRA for Non-Homeless Special Needs	City of Covington and Northern Kentucky HOME Consortium do not plan to use HOME for TBRA.
New Unit Production	<p>Funds are available for new unit production in two programs. The first is CHDO Development Projects. The funds budgeted are not enough to cover the cost of producing an entire unit. They will be used as a gap filler. The projects are always underwritten to HUD's HOME standards and must be able to sell within 6 months, so the market of the surrounding area will be analyzed according to the new HOME rule. These funds are HOME funds and must be used by a designated CHDO. The only CHDOs in the Consortium area are: Center for Great Neighborhoods (CGN) which can only operate in Covington, Entryway, Inc. which can only operate in Campbell County and Housing Opportunities of Northern Kentucky which can operate in the entire HOME Consortium.</p> <p>The other program that can create new units is the Upper Floor Residential Rent Rehab Program using CDBG funds in the City of Covington. This Program is for creation of rental units above commercial spaces in Short Pike/Madison/Scott area, which is in the Core Target area. The City will examine the following characteristics: market size & trends, competition, customer profile and business environment.</p>
Rehabilitation	<p>Funds are available for rehabilitation in two programs. The first is CHDO Development Projects. The funds budgeted are not enough to cover the cost of producing an entire unit. They will be used as a gap filler. The projects are always underwritten to HUD's HOME standards and must be able to sell within 6 months, so the market of the surrounding area will be analyzed according to the new HOME rule. These funds are HOME funds and must be used by a designated CHDO. The only CHDOs in the Consortium area are: Center for Great Neighborhoods (CGN) which can only operate in Covington, and Entryway, Inc. which can only operate in Campbell County and Housing Opportunities of Northern Kentucky which can operate in the entire HOME Consortium area.</p> <p>The second program that the City of Covington will use CDBG funds for will be the Code Enforcement Hardship Rehab/Repair Program. Market characteristics do not play as much as income. The program will be income limited to those persons</p>

	at 60% of the area median income. Once Code Enforcement identifies a property that has code violations and will need to go before the Code Board, the person could be eligible for this program. This program will be available city-wide.
Acquisition, including preservation	City of Covington does not plan to acquire units with CDBG funds in the 2013-14 Program Year.

Table 3 – Influence of Market Conditions

SP-35 Anticipated Resources

Introduction

The Annual Action Plan includes a budget which encompasses revenue from four sources. These include new formula based entitlements, program income, carry-over, 108 Loan repayments. The new formula based entitlements for Program Year 2013-14 are \$1,444,654 in Community Development Block Grant (CDBG) funding and \$403,127 in Home Investment Partnerships (HOME) funding for Covington/Northern Kentucky HOME Consortium (which includes the River Cities of Ludlow, Newport, Bellevue and Dayton). The estimated program income is \$200,000 in CDBG and \$35,000 in HOME. Program income is generated through the repayment of loans made through the Home Owner Rehab Program, the Homeowner Repair Program, Homebuyer Assistance and loans made through the HOME Program to non-profits who are building or renovating homes for low to moderate income home owners. The City of Covington and Northern Kentucky HOME Consortium do not anticipate carry-over. The City of Covington anticipates \$25,000 in Section 108 repayments.

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: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,444,654	200,000	0	1,644,654	7,223,270

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: \$
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	403,127	35,000	0	438,127	2,015,635	This number has been cut severely the last few years, so it is hard to imagine that the estimate for the next five years will be correct.

Table 4 - 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 of Covington and Northern Kentucky HOME Consortium are required to match HOME funds 12.5¢ for every dollar of HOME funding received. The City and Consortium are meeting this goal through volunteer labor provided by a Community Housing Development Organization (CHDO), Federal Home Loan Bank grants and mortgage revenue bonds issued by KHC.

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

Discussion

CDBG Program

- Section 108 Economic Development Loan Repayment -- \$25,000
- Section 108 Hope VI Repayment - \$40,000
- Public Improvements (Streets, Playgrounds, Greenspace) - \$286,000
- Public Facilities Senior Center - \$75,000
- Code Enforcement Hardship Rehab/Repair - \$153,593
- Upper Floor Residential Rent Rehab Program - \$60,000
- Business 1st Grant Program - \$50,000
- Economic Development Technical Assistance (Xceligent & NDC) - \$63,300
- Crime Prevention (City Heights & Downtown) - \$100,000
- Recreation Programs - \$50,000
- Code Enforcement Program Staff - \$126,750
- Place Matters - \$35,000
- Program Staff - \$161,653
- Business Development Staff - \$96,646
- Administration - \$311,712

HOME Program – Covington

- Homebuyer Assistance Program - \$148,162
- CHDO Development Projects - \$36,718
- Program Staff - \$35,426
- Administration - \$24,478

Consolidated Plan

COVINGTON

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HOME Program – Consortium Cities

- Homebuyer Assistance Program - \$121,251
- CHDO Development Projects - \$29,001
- Program Staff - \$23,756
- Administration - \$19,334

Consolidated Plan

COVINGTON

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SP-40 Institutional Delivery Structure

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
	CHDO	Non-homeless special needs Ownership Planning neighborhood improvements	
City of Covington	Government	Economic Development Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	
Entryway, Inc.	CHDO	Ownership Rental	
Housing Opportunities of Northern Kentucky (HONK)	CHDO	Ownership Planning Rental	

Table 5 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

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

Table 6 - 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)

There is not specific information on the use of services. There is no prejudice in the use of services in the community. These issues are being assessed in the Continuum of Care.

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

The needs identified are housing and supportive services for persons with a severe mental illness, developmentally disabled, physically disabled and alcohol/other Drug addicted persons. Also supportive services are needed for elderly persons. Non-Homeless Special Needs is currently a work in progress for agencies and the City of Covington. The Northern Kentucky HOME Consortium is working closely with the Region III Continuum of Care in developing a plan for the Non-Homeless Special Needs population. As the Continuum of Care process evolves, more statistically accurate information will be available for future plans.

Transitions, Inc. receives Emergency Shelter grant funding for its Droege House program in Dayton, Kentucky. Droege House is a non-medical Detoxification unit. Clients stay between 3-7 days and safely undergo detox without withdrawal. Annually the program serves 400 people, and 100 of those are homeless, 50 are Covington residents, and 13 are homeless from Covington.

Also, the Northern Kentucky Community Action Commission receives Emergency Shelter Grant funds through the Kentucky Housing Corporation to use as homeless prevention assistance.

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 strategy is to utilize partnerships and to ultimately locate services in one central, accessible location in the urban core to allow these agencies to share cost burdens thereby using funds for programming efforts.

SP-45 Goals Summary

Goals Summary Information

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Upper Floor Residential Rent Rehab Program	2013	2018	Affordable Housing		All Programs	CDBG: \$300,000	Rental units rehabilitated: 15 Household Housing Unit
Business 1st Grant Program	2013	2018	Non-Housing Community Development		All Programs	CDBG: \$250,000	Jobs created/retained: 10 Jobs Businesses assisted: 15 Businesses Assisted
Covington Homebuyer Assistance Program	2013	2018	Affordable Housing		All Programs	HOME: \$740,810	Direct Financial Assistance to Homebuyers: 70 Households Assisted
NKY HOME Consortium Homebuyer Assistance Program	2013	2018	Affordable Housing		All Programs	HOME: \$606,255	Direct Financial Assistance to Homebuyers: 100 Households Assisted
Section 108 Hope VI Repayment	2013	2018	Non-Housing Community Development		All Programs	CDBG: \$200,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefited: 40640 Persons Assisted
Section 108 ED Loan pool	2013	2018	Non-Housing Community Development			CDBG: \$125,000	Businesses assisted: 25 Businesses Assisted
Streets, Playgrounds, Greenspace	2013	2018	Non-Housing Community Development		All Programs	CDBG: \$1,430,000	Public service activities other than Low/Moderate Income Housing Benefit: 29828 Persons Assisted

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Public Facilities Senior Center	2013	2014	Non-Housing Community Development			CDBG: \$75,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 6166 Persons Assisted
Code Enforcement Hardship Rehab/Repair	2013	2018	Affordable Housing Non-Homeless Special Needs		All Programs	CDBG: \$767,965	Homeowner Housing Added: 75 Household Housing Unit
Economic Development Technical Assistance	2013	2018	Non-Housing Community Development		All Programs	CDBG: \$316,500	
Crime Prevention	2013	2018	Non-Housing Community Development		All Programs	CDBG: \$500,000	Public service activities other than Low/Moderate Income Housing Benefit: 6895 Persons Assisted
Recreation Programs	2013	2018	Non-Homeless Special Needs Non-Housing Community Development		All Programs	CDBG: \$250,000	Public service activities other than Low/Moderate Income Housing Benefit: 29828 Persons Assisted
Code Enforcement Staff	2013	2018	Affordable Housing Non-Housing Community Development		All Programs	CDBG: \$633,750	Housing Code Enforcement/Foreclosed Property Care: 15827 Household Housing Unit
Place Matters	2013	2018	Affordable Housing Non-Housing		All Programs	CDBG: \$175,000	Homeowner Housing Added: 5 Household Housing Unit

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
CDBG Program Staff	2013	2018	Community Development Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development Program Staff		All Programs	CDBG: \$808,265	
Business Development Staff	2013	2018	Non-Housing Community Development		All Programs	CDBG: \$483,230	
CDBG Administration	2013	2018	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		All Programs	CDBG: \$1,558,560	
Covington CHDO Development Projects	2013	2018	Affordable Housing		All Programs	HOME: \$183,590	Homeowner Housing Added: 5 Household Housing Unit
HOME Program Staff	2013	2018	Affordable Housing		All Programs	HOME: \$177,130	

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
HOME Administration	2013	2018	Affordable Housing		All Programs	HOME: \$122,390	
NKY HOME Consortium CHDO Development Projects	2013	2018	Affordable Housing		All Programs	HOME: \$145,005	Homeowner Housing Added: 5 Household Housing Unit
NKY HOME Consortium Program Staff	2013	2018	Affordable Housing		All Programs	HOME: \$118,780	
NKY HOME Consortium Administration	2013	2018	Affordable Housing		All Programs	HOME: \$96,670	
Relocation	2013	2018	Affordable Housing		All Programs	CDBG: \$150,000	Other: 10 Other
Interim Assistance	2013	2018	Affordable Housing Non-Housing Community Development		All Programs	CDBG: \$25,000	Other: 100 Other

Table 7 – Goals Summary

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

The City of Covington/Northern Kentucky HOME Consortium together plan on utilizing its HOME funds to provide homebuyer assistance to 49 low income or extremely low income individuals or families to obtain affordable housing. The City of Covington plans on assisting 3 moderate, low income or extremely low income individuals or families obtain quality, affordable rental housing.

SP-50 Public Housing Accessibility and Involvement

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

Housing of Covington does not have a Section 504 Voluntary Compliance Agreement.

Activities to Increase Resident Involvements

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

No

Plan to remove the 'troubled' designation

SP-55 Barriers to affordable housing

Barriers to Affordable Housing

The City of Covington passed a Human Rights Ordinance, one of only three cities in the state of Kentucky.

The ordinance protects people from discrimination in "housing, employment and public accommodations based on race, color, religion, national origin, sex, age, sexual orientation or gender identity, family status, marital and/or parental status, and place of birth as protective categories to make it a more universal ordinance.

Definitions of sexual orientation and gender identity were modeled after human rights ordinances in Lexington and Louisville. Under sexual orientation, those ordinances protect someone "based upon his or her imputed heterosexuality, homosexuality or bisexuality." Gender identity refers to protections for someone who has "a gender identity as a result of a sex change, surgery or manifesting, for reasons other than dress, an identity not traditionally associated with one's biological maleness or femaleness."

A Bill that has, as of March 14, 2013, been passed by the Kentucky House and is headed to the Senate could give protection to those who oppose Covington's Human Rights Ordinance protection from following it on religious grounds.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

- Support consumer educational programs such as first-time homebuyer
- Participate in fair housing education efforts for City employees, and CDBG and HOME recipients
- Provide information to the public on the City of Covington's and Northern Kentucky HOME Consortium's housing programs via websites, brochures, newsletters and public events
- Support fair housing through its affordable housing activities
- Encourage local developers to create and maintain affordable housing opportunities for low and extremely low-income households
- Continue to support agencies that assist the homeless
- Provide additional information to the public on fair housing
- Facilitate the availability of fair housing and equal opportunity information throughout the City of Covington

- Actively support Fair Housing Month activities
- Encourage mixed income neighborhoods throughout Covington through economic integration and demolishing Jacob Price to de-concentrate public housing
- Continue work to provide affordable housing for anyone that needs it through the Homeowner Rehabilitation Loan program, the Homeowner Repair Program and the Homebuyer Assistance Program
- Physical improvements in traditionally minority occupied developments through the Homeowner Repair loan program and Home Rehabilitation Loan program
- Refer Fair Housing matters to the Covington Human Rights Commission so they can respond to and follow up on matters relating to illegal discrimination, including housing discrimination, in addition to providing education and resources on fair housing issues. The Human Rights Commission will continue to be the community's central location for residents to report housing discrimination
- Post information on Fair Housing laws on the City of Covington's website
- Inform residents about their right to reasonable accommodations under fair housing law
- The City of Covington adopted a new zoning code in 2006 that aims to foster community development and also addresses the needs of those who have met barriers in the past
- Continue to use CDBG funds throughout the City of Covington to construct curb cuts, thus making more areas wheelchair accessible
- Encourage neighborhood revitalization within older and low-income neighborhoods. Encourage residents and prospective residents to tackle issues associated with problematic properties
- Encourage downtown development that provides additional housing opportunities
- Encourage downtown development that improves the standard of living for low-income residents
- CHDO Activities – The creation of housing by the HOME Consortium's CHDO organizations provides housing opportunities for low/moderate income households
- Work with CHDO in Campbell County, Entryway, Inc., to undertake housing development activities in its service area

SP-60 Homelessness Strategy

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

There are a large number of homeless agencies that are active in Campbell and Kenton counties. Through partnerships, there is a drive to locate all services in one central, accessible location. Agencies and City Staff have been researching best practices around our region. Columbus and Indianapolis were both visited to assess how they run award winning programs. The Continuum of Care works with the County and City leadership to make progress in this challenging opportunity.

Addressing the emergency and transitional housing needs of homeless persons

There are many programs that will be using McKinney-Vento Homeless Assistance. Transitions, Inc. will use McKinney-Vento funds for three programs. Transitions Willow Run Project will use \$162,503, Transitions Affordable Housing Project will use \$82,546, and the Transitions Homeless Services Project \$236,711. The Willow Run Project provides transitional housing to homeless individuals in Covington. The Homeless Services Project is a services-only project based in Covington that provides transitional housing with intensive case management, outreach, employment services, psychiatric nursing services, mental health case management, and life skills assistance.

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

The Affordable Housing Project provides permanent supportive housing to 12 homeless individuals in Covington. This is one of only a small number of projects classified as permanent housing for persons with disabilities.

NorthKey Community Care will use \$166,667 for its NorthKey Rental Subsidy Program which is a permanent housing program for homeless and disabled. Permanent housing is a top priority for this region. Welcome House of Northern Kentucky, Inc. will use \$469,110 for its Gaining Access to Programs and Services which is a collaborative supportive services-only grant which serves homeless individual women and families with children that addresses complex, multiple needs through outreach and assessment, crisis intervention, coordination of services, collaborative effort to stabilize families and addresses factors contributing to homelessness. The funds pay for case management, housing counseling, life skills education, childcare, employment services, substance abuse treatment, transportation and housing assistance.

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

Housing Choice Voucher Program

The City of Covington's Housing Development Department administers the Section 8 Housing Choice Voucher Program for all of Kenton County which is inclusive of the City limits and the HOME Consortium city of Ludlow. The Program assists low income households with their rent. Participants pay 30 – 40 percent of their income toward the rent and the Program pays the remainder. Housing Department staff insures that the units meet current code standards, that the rents are comparable to other units in the market place and verify the information provided by participating households. However the Department maintains an inventory of properties that because of their financing are able to provide below market rents and this is provided to households seeking assistance with their rent.

The Newport Housing Authority administers Housing Choice Vouchers vouchers. The Housing Department of Campbell County administers Housing Choice vouchers.

Public Housing

The Housing Development Department as part of the consortium with the Housing Authority of Covington operates three family sites and two elderly sites. Additionally, the governing board of HAC includes a resident member. All members of the Board are appointed by the Covington's Mayor.

The Newport Housing Authority operates 357 units in 6 sites. The Housing Authority of Dayton operates 45 units at one site.

Family Self-Sufficiency

The City of Covington's Housing Development Department administers a Family Self-Sufficiency Program. The Coordinator for the Program works with households to develop and implement a self-sufficiency plan which includes budget counseling, credit repair, and looking at educational and career opportunities. Adjunct to this Program is the City's Section 8 to Homeownership Program. This initiative builds on the Family Self-Sufficiency Program with the specific intention of helping the participating households purchase a home. Currently there are 50 families participating in this program, thirteen of whom have now closed on homes.

The Newport Housing Authority and Campbell County Department of Housing also run Family Self Sufficiency Programs. Newport Housing Authority also runs a Section 8 to Homeownership Program.

SP-65 Lead based paint Hazards

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

All purchases through the Homebuyer Programs are inspected for lead based paint hazards prior to approval. If lead based paint hazards are found they must be remedied using lead safe work practices. Rehabs performed will only be undertaken by certified RRP or abatement contractors to ensure a lead based paint hazard free environment.

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

Due to the jurisdiction's large inventory of pre-1978 homes there are inherently a higher rate of lead based hazards.

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

Programs with assistance up to \$5,000

Homes built in the year 1978 or prior will be presumed that lead based paint is present. Work and repairs to painted surfaces disturbed during work must be performed by an EPA Renovation, Repair and Painting Certified Contractor using lead safe work practices. A clearance exam by a licensed lead paint inspector, risk assessor, or lead sampling technician will be performed at the completion of each job. Clearance according to 24 CFR 35.1340 must be achieved prior to closing out the file.

Programs with assistance \$5,000 to \$25,000

Homes built in the year 1978 or prior will 1) have a paint inspection on surfaces to be disturbed and a risk assessment performed by a licensed lead paint risk assessor/inspector or 2) presume that lead based paint and lead hazards are present. Work will be completed by 1) using interim controls on all hazards identified in the risk assessment, stabilizing all paint disturbed during rehab and according to 24 CFR 35.1330 or 2) using standard treatments on all surfaces presumed to contain lead or be a lead hazard and according to 24 CFR 35.1335. A clearance exam by a licensed lead paint inspector, risk assessor, or lead sampling technician will be performed at the completion of each job. Clearance according to 24 CFR 35.1340 must be achieved prior to closing out the file.

Programs with assistance over \$25,000

Homes built in the year 1978 or prior will have a risk assessment and paint inspection performed by a licensed lead paint risk assessor/inspector. Abatement will be performed according to the risk assessment/inspection report and 24 CFR 35.1325. A clearance exam by a licensed lead paint inspector,

risk assessor, or lead sampling technician will be performed at the completion of each job. Clearance according to 24 CFR 35.1340 must be achieved prior to closing out the file.

SP-70 Anti-Poverty Strategy

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

Housing Choice Voucher Program

The City of Covington's Housing Development Department administers the Section 8 Housing Choice Voucher Program for all of Kenton County which is inclusive of the City limits and the HOME Consortium cities of Bromley and Ludlow. The Program assists low income households with their rent. Participants pay 30 – 40 percent of their income toward the rent and the Program pays the remainder. Housing Department staff insures that the units meet current code standards, that the rents are comparable to other units in the market place and verify the information provided by participating households. The Department maintains an inventory of properties that because of their financing are able to provide below market rents and this is provided to households seeking assistance with their rent.

The Newport Housing Authority administers Housing Choice Vouchers. The Housing Department of Campbell County administers Housing Choice Vouchers.

Public Housing

The Housing Authority of Covington operates three family sites and two elderly sites. Additionally, the governing board of HAC includes a resident member. All members of the Board are appointed by the Covington's Mayor.

The Newport Housing Authority operates public housing sites. The Housing Authority of Dayton also operates one site.

Family Self-Sufficiency

The City of Covington's Housing Development Department administers a Family Self-Sufficiency Program. The Coordinator for the Program works with households to develop and implement a self-sufficiency plan which includes budget counseling, credit repair, and looking at educational and career opportunities. Adjunct to this Program is the City's Section 8 to Homeownership Program. This initiative builds on the Family Self-Sufficiency Program with the specific intention of helping the participating households purchase a home.

The Newport Housing Authority and Campbell County Department of Housing also run Family Self Sufficiency Programs. Newport Housing Authority also runs a Section 8 to Homeownership Program.

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

The Director of the Covington Housing Authority also manages the City's Section 8 Department. The City is able to coordinate that way. The Section 8 Program participants ready to purchase a home can utilize the City and HOME Consortium's Homebuyer Assistance Program.

SP-80 Monitoring

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 subrecipients will be monitored on an annual basis. Staff has developed a monitoring checklist similar to that used in HUD's Transmittal Handbook No. 6509.2 which addresses the following areas: Scope of Services, Operating Budget, Intended Beneficiaries, EEO 11246 Compliance, Monthly Utilization and Progress Report Review, Project Goals and Objectives, Affirmative Action Review and Proof of Low and Moderate Income. Subrecipients submit monthly financial and program reports. Annual audits will be conducted to assure compliance with all applicable regulations including OMB Circular Nos. A-87, A-102, A-110, A-122, A-128, and A-133. If the performance of a subrecipient is sub par, these areas will be pointed out and a follow-up letter will be immediately dispatched. The subrecipient will be given a reasonable length of time to clear up such findings before any further payments are made. Construction contractors must comply with Davis-Bacon, Fair Labor Standards Act, Copeland Act, Prevailing Wage Scales, Section 3 Plan, Female and Minority Utilization, Minority Business Utilization, Executive Order 11246 compliance, as well as Job Safety and Health Protection. Staff will conduct Employee HUD 11 interviews as a means of validating Davis-Bacon compliance. Staff will also visit the company site and discuss with its designee the following: Harassment, Recruitment, Applicant Flow, Union Opposition, Training, Policy Dissemination (Internal), Affirmative Recruitment, Referrals, Selection Validation, Inventory and Evaluation, Personnel Practices, Non-segregated Facilities, Vendors, and Supervisory Review.



SF 424

The SF 424 is part of the CPMP Annual Action Plan. SF 424 form fields are included in this document. Grantee information is linked from the 1CPMP.xls document of the CPMP tool.



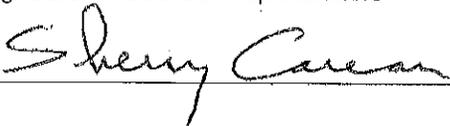
Complete the fillable fields (blue cells) in the table below. The other items are pre-filled with values from the Grantee Information Worksheet.

June 6, 2013	Applicant Identifier	Type of Submission	
Date Received by state	State Identifier	Application	Pre-application
Date Received by HUD	Federal Identifier	<input type="checkbox"/> Construction	<input type="checkbox"/> Construction
		<input checked="" type="checkbox"/> Non Construction	<input type="checkbox"/> Non Construction
Applicant Information			
Covington, KY		KY210534 COVINGTON	
Community Development Department		Duns#: 04-534-2060 #: 04-534-2060	
638 Madison Avenue		Organizational Unit	
Covington	Kentucky	Community Development Department	
41011	Country U.S.A.	Division	
Employer Identification Number (EIN):		Kenton County	
61-6001804		7/1/2013	
Applicant Type:		Specify Other Type if necessary:	
Local Government: City		Specify Other Type	
Program Funding		U.S. Department of Housing and Urban Development	
Catalogue of Federal Domestic Assistance Numbers; Descriptive Title of Applicant Project(s); Areas Affected by Project(s) (cities, Counties, localities etc.); Estimated Funding			
Community Development Block Grant		14.218 Entitlement Grant	
CDBG Project Titles		Community-wide	
\$1,444,654	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$225,500		Other (Describe)	
Total Funds Leveraged for CDBG-based Project(s)			
Home Investment Partnerships Program		14.239 HOME	
HOME Project Titles		Community-wide	
\$403,127	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	

\$35,000	Other (Describe)	
Total Funds Leveraged for HOME-based Project(s)		
Housing Opportunities for People with AIDS		
		14,241 HOPWA
HOPWA Project Titles		Description of Areas Affected by HOPWA Project(s)
\$HOPWA Grant Amount	\$Additional HUD Grant(s) Leveraged	Describe
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged
\$Locally Leveraged Funds		\$Grantee Funds Leveraged
\$Anticipated Program Income		Other (Describe)
Total Funds Leveraged for HOPWA-based Project(s)		

Emergency Shelter Grants Program		14,231 ESG
ESG Project Titles		Description of Areas Affected by ESG Project(s)
\$ESG Grant Amount	\$Additional HUD Grant(s) Leveraged	Describe
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged
\$Locally Leveraged Funds		\$Grantee Funds Leveraged
\$Anticipated Program Income		Other (Describe)
Total Funds Leveraged for ESG-based Project(s)		

Congressional Districts of:		Is application subject to review by state Executive Order 12372 Process?	
4th	4th	<input type="checkbox"/> Yes	This application was made available to the state EO 12372 process for review on DATE
Is the applicant delinquent on any federal debt? If "Yes" please include an additional document explaining the situation.		<input checked="" type="checkbox"/> No	Program is not covered by EO 12372
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A	Program has not been selected by the state for review

Person to be contacted regarding this application		
Sherry		Carran
Mayor	859-292-2127	859-292-2137
scarran@covingtonky.gov	www.covingtonky.gov	Natalie Gardner
Signature of Authorized Representative		Date Signed
		



CPMP Non-State Grantee Certifications

Many elements of this document may be completed electronically, however a signature must be manually applied and the document must be submitted in paper form to the Field Office.

- This certification does not apply.
- This certification is applicable.

NON-STATE GOVERNMENT CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about --
 - a. The dangers of drug abuse in the workplace;
 - b. The grantee's policy of maintaining a drug-free workplace;
 - c. Any available drug counseling, rehabilitation, and employee assistance programs; and
 - d. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will --
 - a. Abide by the terms of the statement; and
 - b. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted --
 - a. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Jurisdiction

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

8. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
9. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
10. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.



June 6, 2013

Signature/Authorized Official

Date

Sherry Carran

Name

Mayor

Title

638 Madison Avenue

Address

Covington/Kentucky/41011

City/State/Zip

(859) 292 - 2127

Telephone Number

- | |
|---|
| <input type="checkbox"/> This certification does not apply. |
| <input checked="" type="checkbox"/> This certification is applicable. |

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

11. Maximum Feasible Priority - With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
12. Overall Benefit - The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2013, 2014, 2015, (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
13. Special Assessments - It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

14. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
15. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Jurisdiction

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K and R, of title 24;

Compliance with Laws -- It will comply with applicable laws.



Signature/Authorized Official

June 6, 2013

Date

Sherry Carran

Name

Mayor

Title

638 Madison Avenue

Address

Covington/Kentucky/41011

City/State/Zip

(859) 292 - 2127

Telephone Number

Jurisdiction _____

- This certification does not apply.**
 This certification is applicable.

**OPTIONAL CERTIFICATION
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities, which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Signature/Authorized Official

Date

Name

Title

Address

City/State/Zip

Telephone Number

Jurisdiction

- This certification does not apply.
 This certification is applicable.

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;


Signature/Authorized Official

June 6, 2013

Date

Sherry Carran

Name

Mayor

Title

638 Madison Avenue

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Telephone Number

Jurisdiction

- This certification does not apply.**
 This certification is applicable.

HOPWA Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature/Authorized Official

Date

Name

Title

Address

City/State/Zip

Telephone Number

- | |
|---|
| <input checked="" type="checkbox"/> This certification does not apply. |
| <input type="checkbox"/> This certification is applicable. |

ESG Certifications

I, _____, Chief Executive Officer of **Error! Not a valid link.**, certify that the local government will ensure the provision of the matching supplemental funds required by the regulation at 24 *CFR* 576.51. I have attached to this certification a description of the sources and amounts of such supplemental funds.

I further certify that the local government will comply with:

1. The requirements of 24 *CFR* 576.53 concerning the continued use of buildings for which Emergency Shelter Grants are used for rehabilitation or conversion of buildings for use as emergency shelters for the homeless; or when funds are used solely for operating costs or essential services.
2. The building standards requirement of 24 *CFR* 576.55.
3. The requirements of 24 *CFR* 576.56, concerning assurances on services and other assistance to the homeless.
4. The requirements of 24 *CFR* 576.57, other appropriate provisions of 24 *CFR* Part 576, and other applicable federal laws concerning nondiscrimination and equal opportunity.
5. The requirements of 24 *CFR* 576.59(b) concerning the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
6. The requirement of 24 *CFR* 576.59 concerning minimizing the displacement of persons as a result of a project assisted with these funds.
7. The requirements of 24 *CFR* Part 24 concerning the Drug Free Workplace Act of 1988.
8. The requirements of 24 *CFR* 576.56(a) and 576.65(b) that grantees develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted with ESG funds and that the address or location of any family violence shelter project will not be made public, except with written authorization of the person or persons responsible for the operation of such shelter.
9. The requirement that recipients involve themselves, to the maximum extent practicable and where appropriate, homeless individuals and families in policymaking, renovating, maintaining, and operating facilities assisted under the ESG program, and in providing services for occupants of these facilities as provided by 24 *CFR* 76.56.
10. The requirements of 24 *CFR* 576.57(e) dealing with the provisions of, and regulations and procedures applicable with respect to the environmental review responsibilities under the National Environmental Policy Act of 1969 and related

Jurisdiction

authorities as specified in 24 *CFR* Part 58.

11. The requirements of 24 *CFR* 576.21(a)(4) providing that the funding of homeless prevention activities for families that have received eviction notices or notices of termination of utility services will meet the requirements that: (A) the inability of the family to make the required payments must be the result of a sudden reduction in income; (B) the assistance must be necessary to avoid eviction of the family or termination of the services to the family; (C) there must be a reasonable prospect that the family will be able to resume payments within a reasonable period of time; and (D) the assistance must not supplant funding for preexisting homeless prevention activities from any other source.
12. The new requirement of the McKinney-Vento Act (42 *USC* 11362) to develop and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. I further understand that state and local governments are primarily responsible for the care of these individuals, and that ESG funds are not to be used to assist such persons in place of state and local resources.
13. HUD's standards for participation in a local Homeless Management Information System (HMIS) and the collection and reporting of client-level information.

I further certify that the submission of a completed and approved Consolidated Plan with its certifications, which act as the application for an Emergency Shelter Grant, is authorized under state and/or local law, and that the local government possesses legal authority to carry out grant activities in accordance with the applicable laws and regulations of the U. S. Department of Housing and Urban Development.

Signature/Authorized Official

Date

Name

Title

Address

City/State/Zip

Telephone Number

- This certification does not apply.
 This certification is applicable.

APPENDIX TO CERTIFICATIONS

Instructions Concerning Lobbying and Drug-Free Workplace Requirements

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant: Place of Performance (Street address, city, county, state, zip code) Check if there are workplaces on file that are not identified here. The certification with regard to the drug-free workplace is required by 24 CFR part 21.

Place Name	Street	City	County	State	Zip

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules: "Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15); "Conviction" means a finding of guilt (including a plea of *nolo contendere*) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes; "Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any

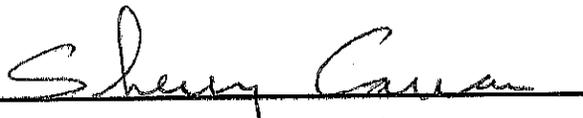
Jurisdiction

controlled substance; "Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including:

- All "direct charge" employees;
- all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and
- a. temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Note that by signing these certifications, certain documents must be completed, in use, and on file for verification. These documents include:

1. Analysis of Impediments to Fair Housing
2. Citizen Participation Plan
3. Anti-displacement and Relocation Plan



June 6, 2013

Signature/Authorized Official

Date

Sherry Carran

Name

Mayor

Title

638 Madison Avenue

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City/State/Zip

(859) 292 - 2127

Telephone Number

Covington Consortium Consolidated Plan 2013-2018

Response to Public Input

1. Increase in green space and recreation activities

Input Received – Need to increase the amount of green space, like to see art in the parks, develop the riverfront, establish a recreation center, need more park facilities to entertain children, keep working on the Licking River Greenway.

Response – The city has dedicated 23% of the PY 2013/14 CDBG budget toward infrastructure and green space/park improvements. The city has two park master plans it is currently executing: the Devou Park Master Plan and the Licking River Greenway. The Devou Master Plan contains plans for the development of this 700 acres urban park, while the Licking River Greenway proposes to develop 5 miles on continuous paved trails along the Licking River. The development of a recreation facility would require significant investment and multiple partners. The city is currently in preliminary discussions with potential partners on the feasibility of a joint venture project.

2. Homeowner Rehab/Education and Vacant Space Rehab/Blight Issues

Input Received – Concern for senior who cannot maintain their houses due to hardships, lack of knowledge of new homeowners on what it takes to own a house, issue of rehab of vacant space for rental, need to continue to remove blight.

Response – The city has dedicated 9.6% of the PY 2013/14 CDBG budget toward residential programs. The city will be sponsoring a Code Enforcement Hardship Program that will provide the necessary funding to repair issues for individuals receiving code violations with no means to make the repairs. The city will use the expertise and knowledge of the Code Enforcement Officers to make recommendations on hardship cases. This program, along with the dedicated funding through the city's capital budget will work toward improving blight in the community. In addition, the city will be supporting a residential rehab rehabilitation project within our urban core, transforming upper floors of mixed use building into quality rental units.

3. Sidewalk on 43rd Street

Input Received – Need provide the missing distance of sidewalk to provide a safe walking path for citizens who use this path to go to the grocery.

Response – The city has dedicated 23% of the PY 2013/14 CDBG budget toward infrastructure and green space/park improvements. The city has a 3-year rotating schedule for infrastructure improvements. Sidewalks are actually the responsibility of the property owners. The city has been investigating options for supporting the necessary rehab to sidewalks with possible use of capital improvement funds as the source of funding.

4. Crime Prevention

Input Received – Continued support of the City Heights crime prevention program

Response – The city has dedicated 9.6% of the PY 2013/14 CDBG budget toward public services which includes crime prevention in both City Heights and the Downtown Core. The city will be turning to the expertise of the Police Department to look strategically with its efforts.

5. Staff for nonprofits

Input Received – In the past the city funded a staff person at OASIS and we had determined a few years ago we would no longer provide funding to nonprofits or social services.

Response – With the steady decrease of funding trending over the last 10 years, the amount of funding available to support all the program and activity desires of the community is not feasible.

6. Enhances Businesses

Input Received – Need to increase places to shop/spend money in our downtown, have things that attract people downtown.

Response – The city has dedicated 7.3% of the PY 2013/14 CDBG budget toward economic development. One particular program the Business First Program will offer critical support to small businesses allowing them the flexibility to use the grant funds where they need it the most. Whether this might be technical assistance, equipment or rent subsidy.

7. Bike Lanes

Input Received – Need to make it safe for bikers, we are a bike friendly community, but there is nothing to show that.

Response – The city is unfortunately restricted by its existing infrastructure that it is not feasible to establish new bike lanes. The city will be making efforts with the Licking River Greenway to establish legislation or sharing the road and the 3-foot, in which vehicles are asked to give bikers a 3-foot buffer when passing them. To accompany the legislation will be a robust educational marketing effort.

8. Westside Pike Area

Input Received – While the designated downtown area is currently seeing a turnaround the Westside area of Pike Street is still at a disadvantage due to the prohibitive cost to rehab the blighted building and the concentration of social service agencies not providing a welcoming market for small businesses or rehabbers.

Response – The city has dedicated 7.3% of the PY 2013/14 CDBG budget toward economic development. One particular program the Business First Program will offer critical support to small businesses allowing them the flexibility to use the grant funds where they need it the

most. Whether this might be technical assistance, equipment or rent subsidy. In addition we are once again support the Upper Floor Residential Rent Program to further enhance the progress from last program year. The boundaries of this program are in discussion to be expanded to include areas of Pike Street. The City has also restructured its Economic Development Incentive packages to include support for façade and rehab available to the entire city boundaries.