Executive Summary

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

1. Introduction

The 2020-2025 City of Covington, Kentucky Consolidated Plan/Annual Action Plan is the result of a collaborative process to identify housing and community development needs. The City utilized resident input, data from the Census and other sources, and input from our nonprofit and for profit partners and stakeholders to develop the Consolidated Plan, a five year strategic plan for the period of July 1, 2020 to June 30, 2025 and the Annual Action Plan for Program Year July 1, 2020 to June 30, 2021.

The primary 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 revitalization. A secondary goal of the plan is to demonstrate to the U.S. Department of Housing and Urban Development (HUD), Covington's plans to effectively and efficiently utilize the federal resources that are provided.

The Consolidated Plan creates strategies and sets goals for the investment of the City's annual allocations of Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds from HUD. The Annual Action Plan identifies available resources, sets annual goals, and outlines projects and activities that the City will undertake in furtherance of the 5 year strategic goals.

The City of Covington, Kentucky is an entitlement jurisdiction that receives an annual formula allocation of CDBG and HOME funds from HUD for community development and affordable housing activities. Covington is the lead agency of the NKY HOME Consortium. The NKY HOME Consortium includes the member cities of Ludlow, Newport, Bellevue and Dayton. These member cities are included in this plan as it relates to the use of HOME funds.

The Annual Action Plan includes a budget which encompasses revenue from three sources. These include new formula based entitlements, program income/recaptured funds, and carry-over funds.

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

The City of Covington and Northern Kentucky HOME Consortium 2020-2025 Consolidated Plan provides a framework to identify and prioritize housing and community development needs and establish goals to address these needs.

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The City has identified the following four Priority Needs to be addressed: Affordable Housing; Public Facilities and Infrastructure Improvements; Neighborhood and Community Services; and Business and Economic Development.

The City has established the following ten goals: Expand Homeownership Opportunities; Increase Affordable Homeownership Units; Increase Affordable Rental Units; Improve Existing Owner Occupied Housing; Improve Streets, Sidewalks and Public Facilities; Improve Parks and Recreational Facilities; Reduce and Prevent Crime; Provide Recreation and Education Opportunities; Increase Jobs through Economic Development; and Reduce Blighted Conditions.

3. Evaluation of past performance

City staff from multiple departments completed an evaluation of past performance In order to establish priority needs and to set the goals for this 5 year strategic plan. This evaluation also led to the creation of the projects and activities for the upcoming program year. This evaluation focused on goals achieved in previous years, program successes and program administration. The evaluation concluded that the City's investment of HUD resources was important and impactful to the City's revitalization. These funds have been leveraged with other federal, state and local funds to be a catalyst for positive change.

CDBG funds were utilized successfully to implement infrastructure and other public improvements, park improvements, recreation programming, economic development efforts, crime prevention activities, targeted code enforcement, affordable housing development and homeowner rehab programs.

The evaluation also concluded that these activities could have even more impact if they were focused more strategically and coordinated more effectively with other investments. To maximize impact and benefit to our residents, the investment of CDBG funds will be done in a more strategic manner. Multiple CDBG projects will coincide with each other to leverage the impact. For example, public improvements and streetscape enhancements occurring in targeted areas will be done in coordination with park improvements, code enforcement, crime prevention efforts, property rehab programs, and economic development initiatives.

HOME funded activities designed to increase the number of low-moderate income homeowners have been highly successful. Funds budgeted for the City's homebuyer assistance programs were fully utilized creating many new homeowners throughout the Consortium cities. HOME was also used to finance CHDO housing development projects. These projects renovated existing housing into affordable homeownership units.

4. Summary of citizen participation process and consultation process

The City of Covington has an adopted Citizen Participation Plan. The purpose of the 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 NKY HOME Consortium Consolidated Plan and Annual Action Plan. The public needs hearing notices were posted on the City website, sent directly to email subscribers, sent to stakeholder groups, and published in the Cincinnati Enquirer at least fourteen (14) days prior to the hearing. The City also placed posters in English and Spanish in high traffic areas of the City advertising 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.

The public hearings were held during the week, after 6:00 P.M. in the architecturally barrier free City Commission Chambers.

The City also sent out a community needs survey asking members of the public to offer opinions and insight on community needs and funding priorities.

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

Once the draft Consolidated Plan/Annual Action Plan was completed, a summary was developed. This summary was published and a 7-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/Annual Action Plan, with the summary and public notice attached, which were available for review at the City of Covington, the City Clerk's office of each member HOME Consortium city, and on the City of Covington's website. On the day prior to this 7-day period, a virtual public hearing was held to provide a forum for persons to comment. Instructions were provided for submitting comments on the plans. Any complaint, view or pertinent comment that was received was substantially responded to within a 15 day period.

Copies of the final Consolidated Plan/Annual Action Plan will be made available for review at the Housing Authorities of Covington and Newport, the Campbell County Department of Housing, City of Covington Neighborhood Services Department, the City Clerk's office of each member Consortium city, and 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 outlining citizen participation comments and responses.

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

All comments received during plan development and during the draft plan public comment period were accepted and taken into consideration in developing the final Consolidated Plan/Annual Action Plan.

7. Summary

As stated in the Introduction, the Consolidated Plan and Annual Action Plan serve as the guiding documents for the expenditure of CDBG and HOME funds received by the City of Covington. The City uses these funds to implement actions, activities, and programs that will address the city's greatest housing and community development needs, especially for low and moderate income households.

The Process

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	COVINGTON	
CDBG Administrator	COVINGTON	Neighborhood Services Department
HOPWA Administrator		
HOME Administrator	COVINGTON	Neighborhood Services Department
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

The City of Covington, KY is the Lead Entity in the Northern Kentucky HOME Consortium. The Consortium includes the cities of Ludlow, Newport, Bellevue and Dayton, KY. The HOME Consortium receives an allocation of HOME funds that can be utilized for eligible activities in all cities of the Consortium.

Consolidated Plan Public Contact Information

Jeremy Wallace

Community Development Manager

859-292-2147/jwallace@covingtonky.gov

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)

1. Introduction

The City of Covington sought input from 16 local organizations, groups, and agencies in developing its 2020-2024 Consolidated Plan. This included a variety of nonprofit service providers, city and county agencies, faith-based organizations, Continuum of Care agencies, and affordable housing developers. The City also reviewed existing plans and attempted to align its proposed goals with these other plans where applicable.

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

The City of Covington works closely with public and assisted housing providers to provide safe, affordable housing. The Kenton County Housing Choice Voucher Program is part of a local consortium with the Covington Housing Authority. This partnership allows both agencies to offer a one-stop shop location and also increase efficiencies. The City provides support and technical assistance to agencies that provide mental health and homelessness services. The City worked closely with the Northern KY Health Department to be awarded and implement a Lead Based Paint Hazard Reduction Grant from the HUD Office of Lead Hazard Control and Healthy Homes.

To foster additional coordination between public and private service agencies, the City of Covington continues to:

-Participate 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.

-Be the Lead Entity in the Northern KY HOME Consortium. The NKY HOME Consortium is an inter-local agreement between Covington, Ludlow, Newport, Bellevue and Dayton created to increase affordable housing opportunities in the region.

-Attend meetings of the Continuum of Care as needed. Provide technical assistance and assist Continuum of Care agencies with grant applications for homeless programs and services.

-Partner with the Northern Kentucky Independent District Health Department on policies, systems and environmental change impacting chronic disease. Coordinate resources to address lead based paint hazards in low-income housing.

-Participate in the OKI Regional Council of Governments planning efforts.

-Participate in regional planning efforts of The Alliance (formerly Vison 2015) to promote local economic development initiatives.

-Partner with the Covington Economic Development Authority to provide technical assistance and funding opportunities for economic development projects.

-Partner with local housing counseling agencies to promote homebuyer education classes, homebuyer assistance programs and foreclosure prevention programs.

-Partner with local for-profit and non-profit housing developers to create affordable housing opportunities.

-Provide technical assistance to public housing agencies in support of their homeownership and self-sufficiency programs.

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

In preparing the Consolidated Plan and Annual Action Plan, local agencies providing homeless services were consulted. These organizations are Welcome House of Northern Kentucky, the Northern Kentucky Community Action Commission, Emergency Cold Shelter of Northern KY and Transitions, Inc. All strategies identified in the Consolidated Plan and Annual Action Plans are a direct result of this consultation, and review of the Demographic analysis, Community Needs and available resources. The City of Covington attends meetings and offers assistance to the Continuum of Care as needed. The City provides technical assistance to local CoC providers for their homeless grant applications. The City completes the required environmental reviews for HUD CoC grant recipients.

Also, the City of Covington signed on to HUD's Mayor's Challenge to End Veteran Homelessness in 2014.

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 funds nor does it administer HMIS.

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

Table 2 – Agencies, groups, organizations who participated

1	**Agency/Group/Organization**	NORTHERN KENTUCKY COMMUNITY ACTION COMMISSION-RHP
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Services-Employment Service-Fair Housing Health Agency Child Welfare Agency Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	NKY Community Action was consulted regarding affordable housing needs, homelessness issues, special needs populations, and economic development.
2	**Agency/Group/Organization**	Center for Independent Living Options
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities Services-Persons with HIV/AIDS Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Non-Homeless Special Needs

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	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	CILO was consulted regarding affordable housing needs, homelessness issues, special needs populations and special housing needs.
3	**Agency/Group/Organization**	ENTRYWAY, INC.
	Agency/Group/Organization Type	Housing PHA Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Neighborhood Foundation/Entryway Inc. was consulted regarding affordable housing needs, housing barriers, public housing needs, and market analysis.
4	**Agency/Group/Organization**	HOUSING AUTHORITY OF COVINGTON
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Services-Education Services-Employment Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Housing Authority of Covington was consulted regarding affordable housing needs, public housing needs, public housing conditions, special needs populations, and market analysis.

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5	**Agency/Group/Organization**	WELCOME HOUSE OF NORTHERN KENTUCKY
	Agency/Group/Organization Type	Housing Services - Housing 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 Service-Fair Housing Services - Victims Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Welcome House of Northern KY was consulted regarding affordable housing needs, homelessness needs and services, homelessness strategies, anti-poverty strategies and market analysis.

6	**Agency/Group/Organization**	Northern Kentucky Health Department
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Health Agency Child Welfare Agency Agency - Emergency Management Other government - Local Regional organization
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Public Health Issues
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The NKY Health Dept. was consulted regarding mental health issues, homelessness issues, other public health issues and lead based paint strategies.
7	**Agency/Group/Organization**	Covington Independent School District
	Agency/Group/Organization Type	Housing Services-Children Services-Health Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Covington Independent School District was consulted regarding child welfare, child health issues, housing affordability needs, homelessness issues and special needs populations.

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8	**Agency/Group/Organization**	BRIGHTON CENTER, INC.
	Agency/Group/Organization Type	Housing Services - Housing 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 Service-Fair Housing Services - Victims Child Welfare Agency Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Brighton Center was consulted regarding affordable housing needs, housing barriers, homelessness needs and services, special needs populations, anti-poverty strategies and economic development.

9	**Agency/Group/Organization**	Emergency Cold Shelter of Northern KY
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Emergency Cold Shelter of Northern KY was consulted regarding affordable housing needs, housing barriers, homelessness needs and services and anti-poverty strategy.
10	**Agency/Group/Organization**	Kenton County Housing Choice Voucher Program
	Agency/Group/Organization Type	Housing PHA Service-Fair Housing Other government - Local Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Kenton County Housing Choice Voucher Program was consulted regarding affordable housing needs, housing barriers, public housing needs and conditions, lead based paint strategies and anti-poverty strategies.

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11	**Agency/Group/Organization**	CENTER FOR GREAT NEIGHBORHOODS
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Health Services-Education Services-Employment Service-Fair Housing Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Center for Great Neighborhoods of Covington was consulted regarding affordable housing needs, housing barriers and market analysis.
12	**Agency/Group/Organization**	WOMEN'S CRISIS CENTER
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Service-Fair Housing Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs

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	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Women's Crisis Center was consulted regarding housing needs, domestic violence issues, homelessness issues and special needs populations.
13	**Agency/Group/Organization**	Center for Accessible Living
	Agency/Group/Organization Type	Housing Services-Elderly Persons Services-Persons with Disabilities Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Center for Accessible Living was consulted regarding affordable housing needs, housing barriers, accessible housing needs and special populations.
14	**Agency/Group/Organization**	The Catalytic Development Funding Corp. of Northern Kentucky
	Agency/Group/Organization Type	Housing Services-Employment Regional organization Planning organization Business and Civic Leaders Community Development Financial Institution
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Catalytic Development Funding Corporation was consulted regarding affordable housing needs, housing barriers, market analysis and economic development needs.
15	**Agency/Group/Organization**	Housing Opportunities of Northern Kentucky (HONK)
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Market Analysis

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	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Housing Opportunities of Northern KY was consulted regarding affordable housing needs, market analysis and lead based paint strategies.
16	**Agency/Group/Organization**	TRANSITIONS, INC.
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Transitions, Inc. was consulted regarding affordable housing needs, homelessness issues and services.

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

All agency types were consulted.

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		

Table 3 – Other local / regional / federal planning efforts

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

The City consulted with the Kenton County Housing Choice Voucher Program and the Covington Housing Authority regarding affordable housing needs and planning. The City also consulted with adjacent units of local government who are members of the Northern KY HOME Consortium. These adjacent cities are Ludlow, Newport, Bellevue and Dayton, KY.

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

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

The City utilized multiple methods of outreach to reach the broadest audience possible. A public meeting was held to identify community needs to be addressed in the plan. The meeting was held at the Hellmann Creative Center. This is a community center located in the center of the City with ample parking and easy accessibility. The City also created a community needs survey that could be completed online and in-person. Input from this outreach helped City staff to identify the priority needs in the community and to establish goals to address these needs. After completion of the draft for the Consolidated Plan and Annual Action Plan, the City held a virtual hearing to highlight the plans and to solicit public comments on the draft plans. The public was instructed on multiple methods of providing comments as well as how to access the full draft plans.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community	The meeting was attended by 16 people.	Please see attached documents outlining citizen participation comments and responses.	All comments received during plan development and during the draft plan public comment period were accepted and taken into consideration in developing the final Plan.	

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Internet Outreach	Non-targeted/broad community	The City received 83 responses to the community needs survey.	Please see attached documents outlining citizen participation comments and responses.	All comments received during plan development and during the draft plan public comment period were accepted and taken into consideration in developing the final Plan.	
3	Public Hearing	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community		Please see attached documents outlining citizen participation comments and responses.	All comments received during plan development and during the draft plan public comment period were accepted and taken into consideration in developing the final Plan.	

Table 4 – Citizen Participation Outreach

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Needs Assessment

NA-05 Overview

Needs Assessment Overview

The City utilized the most recent census information from the American Community Survey, information from the Homeless Point-in-Time Count, the Homeless Management Information System, and consultation with partner agencies, other stakeholders and city staff from multiple departments to analyze the needs of the community. The following areas of need were addressed: housing needs; public housing needs; homeless needs; non-homeless needs; and non-housing community development needs.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The City of Covington lacks the needed amount of affordable housing units. The demand for needed affordable housing is greater than the available units as evidenced by long waiting lists for public and subsidized housing. The existing housing stock is aging and many low income renters and homeowners live in substandard units. The cost of rehabilitating these properties is high due to the age of the housing stock.

The majority of Covington households are at or below 80% of the Household Area Median Income (AMI). There are 4,585 households that are at or below 30% AMI and 7,150 households that are at or below 50% AMI. 113 Households live in substandard housing. 1,985 households pay more than 30% of their income toward housing costs. 2,695 households pay more than 50% of their income towards housing costs. Housing cost burden is a major issue for Covington residents.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	40,640	40,845	1%
Households	18,589	16,745	-10%
Median Income	$38,651.00	$35,664.00	-8%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	4,585	2,565	3,230	1,665	4,700
Small Family Households	1,445	785	890	665	2,470
Large Family Households	365	150	250	135	235
Household contains at least one person 62-74 years of age	785	465	630	310	595
Household contains at least one person age 75 or older	449	510	315	85	160
Households with one or more children 6 years old or younger	1,050	360	405	270	565

Table 6 - Total Households Table

Data Source: 2011-2015 CHAS

Housing Needs Summary Tables

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**
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	4	50	20	10	84	0	25	4	0	29
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	50	30	4	0	84	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	95	25	20	20	160	20	10	35	0	65
Housing cost burden greater than 50% of income (and none of the above problems)	1,780	215	35	0	2,030	365	210	60	0	635

	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
Housing cost burden greater than 30% of income (and none of the above problems)	765	790	280	40	1,875	165	215	505	125	1,010
Zero/negative Income (and none of the above problems)	250	0	0	0	250	70	0	0	0	70

Table 7 – Housing Problems Table

Data Source: 2011-2015 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				
	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
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,930	320	75	30	2,355	385	245	105	0	735
Having none of four housing problems	1,615	1,375	1,360	520	4,870	325	620	1,695	1,115	3,755
Household has negative income, but none of the other housing problems	250	0	0	0	250	70	0	0	0	70

Table 8 – Housing Problems 2

Data Source: 2011-2015 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	905	400	75	1,380	225	100	115	440
Large Related	250	69	14	333	0	10	15	25
Elderly	545	245	45	835	210	189	158	557
Other	980	350	185	1,515	115	135	270	520
Total need by income	2,680	1,064	319	4,063	550	434	558	1,542

Table 9 – Cost Burden > 30%

Data Source: 2011-2015 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	730	70	0	800	175	30	20	225
Large Related	220	4	0	224	0	0	0	0
Elderly	295	115	10	420	125	64	8	197
Other	635	50	25	710	90	110	30	230
Total need by income	1,880	239	35	2,154	390	204	58	652

Table 10 – Cost Burden > 50%

Data Source: 2011-2015 CHAS

5. Crowding (More than one person per room)

	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
NUMBER OF HOUSEHOLDS										
Single family households	110	10	4	10	134	20	10	4	0	34

	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
Multiple, unrelated family households	8	45	10	4	67	0	0	30	0	30
Other, non-family households	30	0	4	4	38	0	0	0	0	0
Total need by income	148	55	18	18	239	20	10	34	0	64

Table 11 – Crowding Information – 1/2

Data Source: 2011-2015 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source Comments:

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

Covington has a lot of older, single homeowners. These residents often live in substandard, older housing units in need of repair. Many of these homeowners are on fixed income and lack the financial resources to make the needed repairs.

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

The Women's Crisis Center estimates that approximately 175 households annually need housing assistance who are victims of domestic violence, dating violence, sexual assault and stalking. It is estimated that approximately 14% of the population of Kenton County identifies as disabled. According to the Center for Accessible Living, many disabled individuals that are able to afford housing still face the issue of accessibility. Though ADA regulations have been in place for almost 30 years, residential buildings rarely consider accessibility. The number of homes with the presence of stairs, the lack of wide doors or wheelchair accessible bathrooms limit the number of housing options available. This also makes it difficult for residents to age in place as they acquire age-related disabilities.

What are the most common housing problems?

Housing affordability, especially quality rental housing, is the biggest issue for Covington residents. There are not enough available, affordable units to meet the local demand. Residents who have Housing Choice Vouchers find it difficult to find landlords who are willing to rent under the Voucher Program. Units that are affordable are often times substandard. The City has aggressively tried to crack down on slum landlords, yet there are still too many substandard units. There are is a lack of senior housing available which will become more of a need as the population continues to age. This is also true for accessible units. New rental units that are being developed aren't creating enough accessible units. For owner-occupied units the biggest issue is substandard housing. The City has an aging housing stock. These properties are expensive to maintain due to their age and historic construction. This is especially challenging for older homeowners. The age of the housing also contributes to high utility costs which affects affordability.

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

Extremely low-income households, people with disabilities, seniors and the homeless are more affected by these problems. Also, large families find it difficult to find adequately sized units that are affordable. Non-English speaking families find it challenging to navigate the housing system.

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

There are many families who live paycheck to paycheck. These are typically lower-income. There are also issues with mental health, chronic health issues and substance abuse. Youth who are aging out of the foster care system are at risk. The amount of affordable units, especially for low-income families has decreased. Families and individuals at risk of becoming unsheltered need child care, affordable transportation options, mental health services, substance abuse programs, case management services, workforce development services, and educational/training programs.

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

The lack of affordable units, substandard housing (inadequate utilities, lead issues, mold, bed bugs), absentee landlords, underemployment, lack of a livable wage, accessible employment with reliable, affordable transportation lead to increased risk of homelessness. Also, mental health, substance abuse and family issues add to the risk.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

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

Introduction

This section outlines four housing problems and the number of households experiencing these housing problems broken down by income category and racial/ethnic group.

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	3,250	1,015	320
White	2,640	735	205
Black / African American	460	260	100
Asian	10	0	15
American Indian, Alaska Native	15	0	0
Pacific Islander	0	0	0
Hispanic	85	0	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 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	1,580	985	0
White	1,145	835	0
Black / African American	320	125	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0

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
Hispanic	80	15	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 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	965	2,265	0
White	840	1,930	0
Black / African American	70	305	0
Asian	10	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	4	0
Hispanic	14	35	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 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	195	1,470	0
White	175	1,345	0
Black / African American	0	120	0

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
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	14	4	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 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

Very-low and low-income households, those at or below 50% of the area median income, are disproportionally affected by these housing problems. It doesn't appear than any particular race or ethnic group is more affected than others.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

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

Introduction

This section outlines four severe housing problems and the number of households experiencing these severe housing problems broken down by income category and racial/ethnic group.

0%-30% of Area Median Income

Severe 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	2,315	1,940	320
White	1,860	1,515	205
Black / African American	325	389	100
Asian	10	0	15
American Indian, Alaska Native	15	0	0
Pacific Islander	0	0	0
Hispanic	70	20	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 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

Severe 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	565	1,995	0
White	455	1,520	0
Black / African American	64	385	0
Asian	0	0	0

Severe 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
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	30	65	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 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

Severe 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	180	3,055	0
White	165	2,600	0
Black / African American	4	365	0
Asian	10	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	4	0
Hispanic	0	50	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 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

Severe 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	30	1,635	0
White	10	1,510	0
Black / African American	0	120	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	10	15	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 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

Very-low and low-income households, those at or below 50% of the area median income, are disproportionally affected by these housing problems. It doesn't appear than any particular race or ethnic group is more affected than others.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

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

Introduction:

This section outlines housing cost burdens and the number of households experiencing these severe housing problems broken down by income category and racial/ethnic group.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	10,515	3,090	2,825	325
White	9,240	2,475	2,295	205
Black / African American	1,000	460	375	100
Asian	10	10	20	15
American Indian, Alaska Native	0	0	15	0
Pacific Islander	4	0	0	0
Hispanic	190	95	55	4

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion:

Very-low and low-income households, those at or below 50% of the area median income, are disproportionally affected by these housing problems. It doesn't appear than any particular race or ethnic group is more affected than others.

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

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

The needs identified affect all racial and ethnic groups. Households in all racial and ethnic groups at or below 50% of the area median income are most affected. The amount of households affected in each racial and ethnic group is similar to the City's population breakdown for these groups.

If they have needs not identified above, what are those needs?

None identified.

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

Census tract 671, the Eastside Neighborhood, has the highest concentration of African-American households in the City.

NA-35 Public Housing – 91.205(b)

Introduction

The Housing Choice Voucher Program (Section 8) is administered by the City of Covington. The jurisdiction for the program is Kenton County, KY. The HCV Department is part of a 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 755 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.

Totals in Use

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	855	995	124	820	51	0	0

Table 22 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Alternate Data Source Name:
Section 8 data

Data Source Comments:

OMB Control No: 2506-0117 (exp. 06/30/2018)

Characteristics of Residents

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	7,520	12,343	10,147	12,690	12,105	0
Average length of stay	0	0	5	6	4	6	3	0
Average Household size	0	0	2	2	3	3	1	0
# Homeless at admission	0	0	0	0	0	0	14	0
# of Elderly Program Participants (>62)	0	0	110	265	18	218	29	0
# of Disabled Families	0	0	148	457	32	392	33	0
# of Families requesting accessibility features	0	0	755	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

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

OMB Control No: 2506-0117 (exp. 06/30/2018)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	378	706	63	603	40	0	0
Black/African American	0	0	377	304	63	230	11	0	0
Asian	0	0	0	3	0	3	0	0	0
American Indian/Alaska Native	0	0	0	12	4	8	0	0	0
Pacific Islander	0	0	0	7	1	6	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

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

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	14	16	2	14	0	0	0
Not Hispanic	0	0	741	979	122	806	51	0	0

OMB Control No: 2506-0117 (exp. 06/30/2018)

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 25 – Ethnicity of Public Housing Residents by Program Type

Alternate Data Source Name:
Section 8 data

Data Source Comments:

OMB Control No: 2506-0117 (exp. 06/30/2018)

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

There are disabled households on the waiting list. Elderly and disabled households receive preference. There is a general lack of accessible units available in the jurisdiction.

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

There are 2,036 families on the Housing Choice Voucher waiting list.

The most pressing need is an increased number of affordable units. These units need to be in close proximity to transportation options. New tenants often need assistance with security deposits at initial lease up. Many tenants, especially elderly and disabled households, need assistance with basic necessities.

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

Their needs seem to mirror the needs of the population in general, but not entirely. There are those who are not on the HCV program who still may struggle with same issues that hinder their housing search. In general, low income families rent units with lower rent costs. These units are often times substandard and in disrepair.

An additional disadvantage to participants of the HCV program is that many property owners choose not to participate. This reduces the number of units available for these households.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The data below is pulled from the 2019 K-Count, also referred to as the Point-in-Time Count. It represents a snapshot of homelessness statistics over a 24 hour period. Data regarding annual homelessness estimates and race and ethnicity is pulled from the Homeless Management Information System (HMIS).

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)	27	155	821	0	0	100
Persons in Households with Only Children	8	11	129	0	0	0
Persons in Households with Only Adults	19	119	692	0	504	0
Chronically Homeless Individuals	24	0	164	0	0	0
Chronically Homeless Families	9	0	11	0	0	0
Veterans	1	8	18	0	0	0
Unaccompanied Child	15	24	254	0	0	0
Persons with HIV	2	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments:

OMB Control No: 2506-0117 (exp. 06/30/2018)

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	768	0
Black or African American	255	0
Asian	7	0
American Indian or Alaska Native	8	0
Pacific Islander	2	0
Ethnicity:	**Sheltered:**	**Unsheltered (optional)**
Hispanic	22	0
Not Hispanic	1,052	0

Data Source Comments:

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

There are approximately 839 families with children and veteran households that are in need of housing assistance annually.

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

The following racial and ethnic groups experience homelessness annually: white: 768; Black or African American: 255; Asian: 7; American Indian or Alaskan Native: 8; Pacific Islander: 2; Hispanic: 22; Not Hispanic: 1052.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

According to the 2019 Point in Time Count there are approximately 105 homeless individual unsheltered on a given night and approximately 317 sheltered on a given night.

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

Introduction:

This section outlines special needs populations in the community and the needed supportive services of those populations.

Describe the characteristics of special needs populations in your community:

Characteristics of special needs populations in the community include: mental health issues, substance abuse, physical disabilities, elderly, minority populations, lack of education, poor nutrition, domestic violence and unstable households, hearing impaired, blind, wheelchair bound, and/or limited mobility, children who are aging out of foster care.

Lack of safe and affordable accessible housing, education or employment or skills training, and/or reliable transportation are needs for characteristics of special needs populations in our community. Disabled persons in wheelchairs have an especially difficult time finding not only an accessible housing unit, but also one that is in a neighborhood with accessible sidewalks and access to essential services.

Youth who age out of foster care who may still be in high school, often lack the support and resources to set their life on a path of self-sufficiency. Employment and housing are their biggest issues.

Person from the elderly population are typically living on Social Security as their only income. They are particularly vulnerable when a spouse dies or if they develop serious health problems. Alcohol or drug abuse can also be a factor in their ability to maintain a home.

Second Chance residents with a felony returning from incarceration who may or may not have children, typically do not have good housing references nor do they have the resources for deposits or first month's rent.

Large families find it harder it is to locate housing. The cost of 3+ bedrooms typically exceeds the income of many families.

What are the housing and supportive service needs of these populations and how are these needs determined?

These special needs populations are in need of: health services, case management, assistance with accessing benefits and housing assistance, job training and workforce development programs, transportation, job placement, quality child-care services, GED testing, financial literacy, post-secondary education or certificate programs, and past student loan debt, additional affordable housing units, especially for the elderly, disabled and extremely low-income.

For increased housing stability, individuals need assistance accessing mainstream benefits including SNAPS, TANF, childcare, Medicaid, Representative Payee services, employment, education assistance, and help learning daily living skills.

Many of these groups are in need of safety net services in addition to housing. When an individual or family does not have a home, it is difficult to cover the bare essentials. Without a permanent residence it is difficult to get a job, put food on the table, and keep children in school (much less have a place to get homework done). Housing impacts all other aspects of a family's life by creating barriers.

There is a tremendous need for affordable housing and housing alternatives including personal care homes and housing for those with addictions. Options for individuals with addictions are increasing due to recent increases in available funding, but the need still remains.

One need for people with mobility issues is accessible housing, particularly rental units with ramp as opposed to stair access. The community has need for more group homes options where assistance is available but persons with mental disabilities are able to live and work independently.

The City consulted with local social service agencies to determine these needs. These agencies identify needs through discussions with families to determine needs and income. Families are then referenced to housing programs within the area that complete further assessments to refer families to agencies that assist in the removal of housing barriers such as outstanding utility bills, past due rent, and security deposits.

Needs are also identified through case management, relationships, emergency shelter services, and coordinated entry for the most vulnerable, chronic and disabled persons.

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

According to the State of KY HIV/AIDS Surveillance Report from June 30, 2018 there are 190 people with HIV in Campbell County and 486 people in Kenton County with HIV.

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

Describe the jurisdiction's need for Public Facilities:

The City of Covington has placed high value on its public facilities, specifically its parks and recreation facilities. The City implemented a 10 year plan to improve the park facilities. The City has 20 parks located in neighborhoods across the City. The majority of these parks serve low-mod income populations. These parks are vital to the quality of life for Covington residents. Improving existing parks and adding additional parks and greenspace are always some of the top priorities when citizens provide input regarding city priorities.

Parks provide numerous benefits to the health and wellness of a community. Parks can be part of a strategy to address issues such as poor nutrition, hunger, obesity, and physical inactivity. Studies also indicate that a connection to nature can relieve stress, improve interpersonal relationships, and improve mental health.
Finally, parks are important because they can serve as gathering places for the community and can help cultivate community ties, leading to a sense of connectedness that leads to a more livable and desirable community.

How were these needs determined?

The City has completed a Parks Master Plan which included extensive public outreach regarding community needs as well as a detailed existing conditions inventory of existing parks. This Plan outlines the park facilities in most need of rehabilitation as well as opportunities for new parks and greenspace.

Describe the jurisdiction's need for Public Improvements:

The City has a lot of aging infrastructure. Except for an area known as South Covington, which was annexed in 1965 and has newer facilities, most of the City's infrastructure is over 100 years old. The City has prioritized public improvements and has utilized a majority of recent CDBG funding on these improvements. The City has also leveraged CDBG with other federal, state and local funds to complete public improvements. There are some large infrastructure needs that currently exist including: levy stabilization on the Licking River, hillside slide issues on Western Avenue, and repairs to the Caroline Avenue underpass.

The City also has an abundance of vacant and dilapidated buildings. Steps have been taken to try to address this blight such as acquisition, increased code enforcement activities, and incentives to spur private developers to purchase and rehabilitate properties. These efforts will be increased in the coming years.

How were these needs determined?

The Department of Public Works conducts an annual survey of needed public improvements. These improvements are then prioritized based on need and community impact as well as available resources.

Describe the jurisdiction's need for Public Services:

The City has a high need for public services. The main services needed are housing and homeless services with case management, addiction and recovery, senior services, childcare and youth programs, employment programs, crime prevention programs and financial management services. There are multiple local agencies that offer these types of services, however resources are always inadequate to address the demand. The City funds public services that provide educational and recreational opportunities for children in the City as well as crime prevention/community policing programs.

How were these needs determined?

Public service needs are largely determined through citizen and stakeholder consultations, as well as through consultations with City staff.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

This section includes an analysis of the jurisdiction's current housing market. It includes information in relation to current housing units (public and private), conditions, costs of housing, homeless and special needs facilities, barriers to affordable housing, broadband needs, and hazard mitigation (lead-based paint, other environmental hazards, and hazards created by climate change).

The housing market in the City is in high demand causing home sales prices and rent costs to increase. This has increased housing cost burden as incomes have not risen at the same rates. The City has a generally older housing stock. This creates a large inventory of housing units that may be in need of rehabilitation and/or lead-based paint hazard mitigation. The main public housing need exists at the City Heights public housing complex which has been determined to be functionally obsolete. The City has adequate facilities to assist the homeless population. These facilities do have a shortage of adequate resources. The main barriers to affordable housing is lack of available land and available resources. The City has experienced flooding issues I recent years that may be a result of increased rainfall due to climate change.

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

Introduction

Data from the 2011-2015 ACS indicates that there are 20,200 residential units in the City, 55% of which are single-unit detached structures and 20% being buildings with 2-4 units. The majority of owner-occupants and renters live in units with at least two bedrooms.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	11,200	55%
1-unit, attached structure	735	4%
2-4 units	3,975	20%
5-19 units	2,130	11%
20 or more units	1,905	9%
Mobile Home, boat, RV, van, etc	255	1%
Total	***20,200***	***100%***

Table 27 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	10	0%	670	8%
1 bedroom	640	8%	3,225	38%
2 bedrooms	2,640	32%	2,745	32%
3 or more bedrooms	4,965	60%	1,845	22%
Total	***8,255***	***100%***	***8,485***	***100%***

Table 28 – Unit Size by Tenure

Data Source: 2011-2015 ACS

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

The City administers three HUD grants that address housing needs. The HOME Program creates homeownership opportunities for approximately 100 low-income households annually through down payment assistance and housing development. The City utilizes the CDBG Program for homeowner rehabilitation and affordable rental housing development. Homeowner rehabilitation assists approximately 25 low-income households annually, targeting elderly, disabled and veteran households. Rental development creates approximately 10 new units of affordable rental that is made available to low-income households annually.

The City also manages the Housing Choice Voucher Program, Project Based Section 8 and Public Housing units. These programs offer ongoing rental assistance to low- and very-low income households. There are currently --- Housing Choice Vouchers, --- Project Based Section 8 units and 755 Public Housing units.

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

The City does not anticipate the loss of any Section 8 contracts or project based Section 8 units. The Housing Authority of Covington is considering the removal of a public housing complex. This complex has been deemed to be past its useful life and the cost of modernization and rehabilitation is problematic. If these units are eliminated, they will be replaced by Section 8 Housing Choice Vouchers so that the amount of affordable housing availability remains the same.

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

There is a shortage of affordable rental units in the City. Public housing programs have long waiting lists indicating a high demand for affordable units. Landlords have been hesitant to participate in the Section 8 Program. The City has seen a resurgence of new rental development, especially in the urban core, however these units have typically been high market rate units.

Describe the need for specific types of housing:

The greatest need for housing is for extremely low-income households. These households are at greatest risk of becoming homeless. There is also a shortage of housing available for seniors. This is becoming more of an issue as the City's population continues to age.

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

Introduction

The housing market in the City is in very high demand. This has caused median home sales prices and median rent costs to increase substantially over the last year. Median household income has not increased at the same levels making housing less affordable for homeowners and renters.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	100,900	97,700	(3%)
Median Contract Rent	482	538	12%

Table 29 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than $500	3,530	41.6%
$500-999	4,415	52.1%
$1,000-1,499	340	4.0%
$1,500-1,999	115	1.4%
$2,000 or more	85	1.0%
Total	***8,485***	***100.1%***

Table 30 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,735	No Data
50% HAMFI	4,930	1,555
80% HAMFI	7,335	3,470
100% HAMFI	No Data	4,614
Total	***14,000***	***9,639***

Table 31 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent ($)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	0	0	0	0	0
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

Table 32 – Monthly Rent

Data Source Comments:

Is there sufficient housing for households at all income levels?

There is insufficient housing available for low- and very-low income households. This is indicated by the long waiting lists for public housing assistance. Approximately 25% of households in the City earn less than $35,000 annually.

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

Median home sales process and median rent costs continue to rise which is adding to the affordable housing shortage.

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

HOME rents and Fair Market Rents are comparable to Area Median Rents currently. Area Median Rents are rising which will increase the need to produce and preserve affordable housing.

Discussion

As home values and rent costs continue to rise faster than median income, the need for affordable housing for lower income households will increase. Programs and services for extremely low-income households will be even more necessary in the future.

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

Introduction

The following section describes the characteristics of the housing stock in Covington, including the condition, age, and number of units affected by lead-based paint hazards. 74% of the City's housing stock was built before 1980. 74% of owner-occupants and 87% of renters live in units built before 1980. 14% of all units built before 1980 include children aged six or younger.

Definitions

Units are considered to be in “standard condition” when the unit is in compliance with the International Building Code. Units are considered to be in “substandard condition but suitable for rehabilitation” when the rehab cost represents 50% or less of the estimated or projected value of the unit after the rehabilitation.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	1,850	22%	4,085	48%
With two selected Conditions	90	1%	195	2%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	6,325	77%	4,205	50%
Total	***8,265***	***100%***	***8,485***	***100%***

Table 33 - Condition of Units

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	600	7%	365	4%
1980-1999	1,595	19%	765	9%
1950-1979	1,780	22%	2,445	29%
Before 1950	4,280	52%	4,905	58%
Total	***8,255***	***100%***	***8,480***	***100%***

Table 34 – Year Unit Built

Data Source: 2011-2015 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	6,060	73%	7,350	87%
Housing Units build before 1980 with children present	655	8%	475	6%

Table 35 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 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 36 - Vacant Units

Data Source: 2005-2009 CHAS

Need for Owner and Rental Rehabilitation

23% of owner-occupied housing and 50% of rental housing has at least one selected condition. Cost burden may be the selected condition present in many of these units. However, the majority of the City's housing stock was built prior to 1950. There is a large inventory of aging housing stock in need of rehabilitation.

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

There are approximately 1,760 units (10.5%) that are occupied by low- or moderate-income families with children six years of age or under that may contain lead-based paint hazards.

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

Introduction

This section outlines the current condition and restoration needs of public housing units and developments in the jurisdiction.

Totals Number of Units

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			855	995	124	820	51		
# of accessible units									
***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**									

Table 37 – Total Number of Units by Program Type

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

Describe the supply of public housing developments:

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

There are a total of 855 public housing units located within the city limits of Covington, KY. The majority (88%) were built between 1939 and 1972. The remaining units are structures built, acquired and/or renovated between 2007 and 2015.

OMB Control No: 2506-0117 (exp. 06/30/2018)

Public Housing Condition

Public Housing Development	Average Inspection Score
City Heights	77
Latonia Terrace	94
Golden Tower	80
Academy Flats	37
Emery Drive	71
Eastside Revitalization I	49
Eastside Revitalization II	83
Eastside Revitalization III	84
River's Edge	96
New Site Properties	75

Table 38 - Public Housing Condition

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

As described in the Housing Authority of Covington's Annual Plan for Fiscal Year 7/1/20-6/30/21:

A Disposition Application for all or a portion of the 366 units at the **City Heights** development, will be submitted in 2020. This development consists of 1, 2, 3 and 4 bedroom row-style units. A Physical Needs Assessment, prepared by Creative Housing Solutions, was delivered 10/18/19. The report characterizes City Heights as severely distressed with major infrastructure and design deficiencies. The development is obsolete and neither marketable nor viable in its current configuration. The number of accessible apartments and public use areas are also inadequate per ADA (Americans with Disabilities Act) and UFAS (Uniform Federal Accessibility Standards) guidelines. Modernization costs needed over a three year period are estimated to exceed $50,000,000, yielding a TDC Total Development Cost of 60.49%. This TDC exceeds the Qualifying Needs threshold of 57.14% per HUD Notice 2018-4. Other long term needs are estimated to exceed another $10,000,000.

Strategies to deconcentrate poverty in City Heights from the current configuration have yet to be determined, but may include TPV (tenant protection vouchers), other HCV (Housing Choice Vouchers), homeownership, senior housing and mixed use development. There will also be exploration of opportunities to expand affordable housing outside the footprint of the City of Covington through various inter-governmental agreements.

The on-going restoration and revitalization needs of units in the Authority's remaining portfolio are addressed through the agency's Capital Fund grant program.

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

Efforts to improve the living environment of residents of public housing over the past year that are either completed, in progress or under review, include:

- City Heights: Repaired/restored playground and shelter equipment; campus-wide WIFI; new security equipment
- Latonia Terrace: Campus-wide WIFI, new security equipment; stand-alone heating and air systems
- Golden Tower: Upgraded elevator system; upgraded fire panel; new basement windows; new lobby front/back sliding doors; renovated resident lounge; upgraded buss duct electrical system; COVID-19 health screenings; new security equipment; up-graded PTAC units
- Academy Flats**:** Outdoor shelter and patio; Security alarms on doors; new screens
- Emery Drive: New drainage and storm sewer system to reduce standing water; repaved parking lot; new screens

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

Introduction

The data in this section is from the HUD 2019 Continuum of Care Housing Inventory Count Report.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	24	87	0	18	0
Households with Only Adults	47	0	26	111	0
Chronically Homeless Households	0	0	0	65	0
Veterans	0	0	0	64	0
Unaccompanied Youth	16	0	6	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source Comments:

OMB Control No: 2506-0117 (exp. 06/30/2018)

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

There are a variety of mainstream services that are used to complement targeted services for the homeless.

Welcome House of Northern Kentucky, Inc. administers the Gaining Access to Programs and Services which is a collaborative supportive services program which serves homeless individual women and families with children that addresses complex, multiple needs through outreach and assessment, crisis intervention, and coordination of services. This is a collaborative effort to stabilize families and addresses factors contributing to homelessness.

The United Way operates the 2-1-1 line to refer persons seeking assistance to the appropriate service provider and facilitate access to these services for the entire community. 2-1-1 directs callers to appropriate service providers for job training, resources for food, clothing, and shelter, and numerous other services.

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

The following facilities and service providers participate in the Continuum of Care (CoC) and typically receive HUD funding to provide housing and services to homeless persons. There are also privately-funded organizations that do not participate in the CoC but provide housing and emergency rental assistance, and basic services such as meals and winter clothing to homeless persons and those at risk of homelessness:

Brighton Center of Covington; Emergency Shelter of Northern KY; Fairhaven Rescue Mission; Welcome House of Northern KY; Women's Crisis Center; Center for Independent Living Options; Housing Authority of Covington; Transitions, Inc.; Be Concerned.

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

Introduction

This section presents an overview of available assistance, supportive housing needs of special needs populations, and the activities planned to undertake during the Consolidated Plan period to address the needs of these populations.

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 greatest single need for all of these populations is affordable housing. Rather than being placed in a personal care home, elderly or disabled persons would benefit from living in individual apartments or group living situations where supportive serves such as money management, housekeeping, and assistance with daily living can be provided. Able-bodied individuals need assistance obtaining employment and the necessary supports to maintain employment such as affordable childcare and transportation.

Supportive housing needs include: case management; primary care; workforce development and education services; mental health treatment; emergency assistance; supplemental food assistance and access to public benefits; and help with transportation, in particular to and from medical appointments; age appropriate social activities; in home case management and housework assistance; rental assistance; and medicine delivery.

Due to advances in medicine, some individuals with disabilities are outliving their caretakers. The lack of group home options forces some of these individuals that could live and work independently to rely on nursing homes as residences. Ageing populations that would prefer to age in place have difficulties remaining in their community at the onset of age-related disabilities due to the lack of available accessible housing.

Housing that is accessible for people with disabilities with ramps or elevators is needed.

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

The Life Learning Center has employment or rescue assistance for individual seeking employment. Transitions and Wrap House have programs that provide assistance to persons returning from mental and physical health institutions. Additionally there are Sober Living homes in the area.

The senior buildings with a Service Coordinator are able to assist residents to access home health services. At the Brighton Recovery Center, some women need a recovery house in which to transition

after their treatment program. This provides added protection from relapse and keeps them connected to AA and other community support services.

Emergency Shelter of NKY provides a one-night emergency night during winter months, November through March, for adult men and women that are discharged from KY hospitals, mental health institutions, and jail. The ESNKY has a contract with Mental Health of America for mental health court diversion for at a minimum of 2 beds. The ESNKY also provides a one-night emergency night during summer months, May through November, for adult men being discharged from NK hospitals, jails, and mental health institutions. The ESNKY also maintains the contract with Mental Health of America for mental health court diversion during the summer months. Due to the limited number of Emergency Shelter beds, ESNKY refers adults and families out of state for shelter beds.

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 Housing Authority of Covington will support the residents of its units through the work of the Resident Services Department. The Resident Services Department provides educational, vocational, and social programs to various resident populations, including but not limited to, pre-school aged children, school aged children, adults, and the elderly.

Over the next year, work readiness programs and after-school programs will be made available to interested residents. Additionally, either the Jobs Plus and/or the ROSS- FSS programs are available to all eligible residents. These grant programs provide case management services as well as support coordination and financial incentives for participation.

Welcome House plans to provide funds to help divert families from needing to enter shelter and Permanent Supportive Housing. Provide Representative Payeeship to individuals who receive SSI or SSDI who are unable to manage their own finances.

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Common barriers to affordable housing may be public policies or non-governmental conditions that hamper the development or rehabilitation of affordable housing. These conditions include land use controls, property taxes, state prevailing wage requirements, environmental protection, cost of land, and availability of monetary resources.

Barriers to affordable housing in the City of Covington include lack of available land, lack of monetary resources, cost of property rehabilitation, outdated zoning regulations, local historic preservation guidelines and cost of building permitting and fees. Affordable housing development is complicated and requires significant expertise. Landlords have historically been hesitant to participate in the Housing Choice Voucher program.

A significant barrier to affordable housing is the NIMBY or “Not in My Back Yard” stance. Local communities are not typically open to new affordable housing developments.

Additional barriers include required security deposits for low- and moderate-income families, the lack of available Section 8 Units, and lack of 3 and 4 bedroom units.

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

Introduction

Data presented in this section provides an overview of Covington's economy, including business activity, labor force characteristics, and educational attainment.

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	31	0	0	0	0
Arts, Entertainment, Accommodations	2,775	2,077	17	14	-3
Construction	692	618	4	4	0
Education and Health Care Services	2,618	2,070	16	14	-2
Finance, Insurance, and Real Estate	1,282	3,398	8	23	15
Information	264	124	2	1	-1
Manufacturing	1,752	1,373	11	9	-2
Other Services	597	381	4	3	-1
Professional, Scientific, Management Services	1,876	2,570	12	17	5
Public Administration	0	0	0	0	0
Retail Trade	2,199	1,710	14	11	-3
Transportation and Warehousing	1,028	299	6	2	-4
Wholesale Trade	1,027	408	6	3	-3
Total	16,141	15,028	--	--	--

Table 40 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

OMB Control No: 2506-0117 (exp. 06/30/2018)

Labor Force

Total Population in the Civilian Labor Force	20,515
Civilian Employed Population 16 years and over	18,070
Unemployment Rate	11.88
Unemployment Rate for Ages 16-24	38.10
Unemployment Rate for Ages 25-65	7.76

Table 41 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	3,555
Farming, fisheries and forestry occupations	1,065
Service	1,795
Sales and office	4,935
Construction, extraction, maintenance and repair	1,279
Production, transportation and material moving	1,330

Table 42 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	12,700	74%
30-59 Minutes	3,560	21%
60 or More Minutes	850	5%
Total	***17,110***	***100%***

Table 43 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	1,205	340	1,780

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
High school graduate (includes equivalency)	4,150	605	2,210
Some college or Associate's degree	5,265	640	1,480
Bachelor's degree or higher	4,315	175	495

Table 44 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs.	25–34 yrs.	35–44 yrs.	45–65 yrs.	65+ yrs.
Less than 9th grade	160	190	165	515	640
9th to 12th grade, no diploma	730	645	715	1,095	675
High school graduate, GED, or alternative	1,175	1,385	1,560	4,020	1,705
Some college, no degree	1,340	1,955	1,390	2,390	865
Associate's degree	150	415	490	755	90
Bachelor's degree	425	1,335	770	1,190	415
Graduate or professional degree	45	410	530	775	245

Table 45 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	14,868
High school graduate (includes equivalency)	61,553
Some college or Associate's degree	63,242
Bachelor's degree	95,401
Graduate or professional degree	112,737

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

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

The top five employment sectors in the jurisdiction are: Arts/Entertainment/Accommodation; Education and Health Care Services; Retail Trade; Professional/Scientific/Management Services; and Manufacturing.

Describe the workforce and infrastructure needs of the business community:

Transportation continues to be an issue for those without cars because it is difficult to reach job centers by utilizing the current public bus transportation system. Reaching job centers in Ohio is challenging and time consuming for workers using public transit. Covington has an aging infrastructure system that will need to be maintained in order to continue to attract employers. The City has made major investments in riverfront redevelopment.

The City has seen a large influx of jobs in the health care and health sciences fields. These jobs will require training beyond high school. Workforce development and educational opportunities will be vital to the area.

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.

The largest economic/jobs opportunity that the City has seen in many decades is imminent. The City is planning to purchase the former Internal Revenue Service site located near the riverfront. This is a 23 acre site that is considered one of the most valuable and redevelopable sites in the Midwest. Once acquired, the City will secure a developer to transform the site into a mixed-use development with housing, retail, office space and public spaces. This site will require major infrastructure improvements including reestablishing the street grid.

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

The majority of residents in the City do not have higher than a high school education. There is a gap in the qualifications of the workforce and the employment opportunities.

Many residents do not have the skills and education needed for the employment opportunities available that pay a livable wage. They are forced to take jobs that pay very little, making it difficult for them to afford housing and support their families independently.

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.

The area has a strong community college system. There are many job training programs available through social service agencies like the Northern KY Community Acton Commission. The existing YouthBuild program teaches at risk youth the construction trade and assists them in getting a high school diploma or GED. They also provide Enhanced Operator Certification for those in the YouthBuild program who are interested in manufacturing jobs. The Lincoln Grant Scholar House provides housing, educational support, and family support to single parents pursuing a college degree. The Kenton County School system recently opened the Ignite Institute. This is a specialized high school that focuses on training students in the advanced manufacturing and science fields.

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

No

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

In January 2019, the City of Covington retained Garner Economics, LLC to help create a citywide economic development strategy that takes into account the dynamics of the Covington market and propels the City into more high-value economic growth.

The Report, "FROM OPPORTUNITY TO ACTION", details the asset development, marketing, and organizational changes that the City, its economic development department, and its partners must make to reinvigorate the City and strengthen its competitive position as a business location. Implementation will help the City attract and retain businesses, create jobs and opportunities, and attract more talent to the area. It will also serve as a guide to regional organizations in support of Covington.

Part of the basis for the City’s strategy lies in understanding Covington’s competitive advantages and disadvantages when compared to the region, the state, and the nation. There are also communities with qualities and aspects that Covington aspires to emulate, replicate, or adapt and adopt. This report contains a wealth of data and comparisons which were critical to the development of the strategy.

MA-50 Needs and Market Analysis Discussion

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

The City has small areas with multiple housing problems that are interspersed with areas that have few problems. There is no true concentration of households with multiple housing problems in our jurisdiction. Housing problems and issues exist in all neighborhoods.

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

Census Tract 671 is the area with the highest concentration of racial minorities in the jurisdiction. The City's Hispanic community has increased, but they are not concentrated in any one area. 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 strong for properties that are in good physical condition. There has been a large increase in property redevelopment, especially in the urban core. There have been multiple, large new rental developments that have been constructed in the last two years. At the same time, there continues to be a large inventory of vacant and abandoned buildings. Existing buildings tend to be older requiring a lot of rehab and maintenance. These costs can be prohibitive for developers and especially for low-income homeowners. The City does have a good inventory of homes available for first-time buyers and lower-income buyers. The recent increase in development has caused an increase in property values and sales costs.

Are there any community assets in these areas/neighborhoods?

The City has a large park system. There are approximately 20 parks that are located in the City. Every neighborhood has a park facility. The City has prioritized park improvements and additions in low-income neighborhoods. The City has completed a parks master plan to prioritize park improvements to meet the needs of the community.

Are there other strategic opportunities in any of these areas?

The biggest strategic opportunity is the former IRS site on the riverfront. This site is the only site in the city with multiple acres of developable land. This site is in close proximity to the urban core and many of these lower-income neighborhoods.

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

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

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

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

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

The City has experienced flooding issues in recent years due to increased levels of rainfall. This flooding is caused mainly by hillside runoff and under capacity in the storm water systems. Most of the City has combined storm and waste water systems. In unusually high rainfall events, these systems can back up causing flooding in the streets and in residences. The City is surrounded on two sides by the Ohio and Licking Rivers. These rivers don't pose a serious threat of flooding due to an extensive levy system that is in place. This levy system does have some maintenance issues that need to be addressed in the near future.

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

The recent flooding events have occurred mostly in the Peaselburg and Latonia neighborhoods. These neighborhoods have a high concentration of low-income census tracts.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

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

Geographic Area

Table 47 - Geographic Priority Areas

1	**Area Name:**	Citywide
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	The jurisdiction of the City of Covington Government includes the geographical boundaries of the City. Activities that provide direct assistance will be available to qualifying individuals and families on a citywide basis. Activities that qualify on a low- and moderate-income area basis will be available in the qualifying census tracts/block groups.
	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?	Citizen participation revealed that the majority of citizens feel that funds should be allocated across all areas of the City based on the needs of each neighborhood.
	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?	
2	**Area Name:**	HOME Consortium Cities
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	

	Revital Type:	Housing
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	The City of Covington is the lead entity of the Northern KY HOME Consortium. This Consortium includes the geographical boundaries of Covington, Ludlow, Newport, Bellevue and Dayton, KY. HOME projects and activities are available citywide to qualifying individuals and families in all cities in the Consortium.
	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?	Citizen participation revealed that the majority of citizens feel that funds should be allocated across all areas of the City based on the needs of each neighborhood.
	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?	
3	**Area Name:**	NRSA
	Area Type:	Strategy area
	Other Target Area Description:	
	HUD Approval Date:	12/27/2006
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	The Covington NRSA is bounded by the Ohio River on the North, the Licking River on the East, 15th Street on the South and Interstate 71/75 on the West.
	Include specific housing and commercial characteristics of this target area.	This area encompasses the main part of the urban core. It has a mix of residential and commercial areas. This area has seen a large influx of new development in the last few years.

	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The City has completed a Center City Action Plan and an extensive Economic Development Plan that has identified this area as a prime strategic area for development. This area also includes the former IRS site which is a 23 acre riverfront site scheduled for acquisition and redevelopment.
	Identify the needs in this target area.	This area has seen a lot of redevelopment in the last few years. However, there remains a lot of vacant, abandoned and blighted properties. There are many residential properties in the area that are in poor condition.
	What are the opportunities for improvement in this target area?	There are many properties in the area that could be suitable for redevelopment. The largest opportunity is the former IRS site.
	Are there barriers to improvement in this target area?	Most of the undeveloped properties in the area are older and in need of major renovation. These costs can often times be higher than any possible returns on investment.

General Allocation Priorities

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

Except for specific activities targeted for the NRSA, activities and projects are generally available citywide to low- and moderate-income persons. Assistance that benefits low-income people directly are available to any that qualify. Projects that qualify on an area basis are provided in low-income census tracts/block groups. The City does try to leverage activities that are occurring in certain areas. For example, if public improvements are occurring in a certain neighborhood, code enforcement and crime prevention programs will be increased in those neighborhoods.

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

Priority Needs

Table 48 – Priority Needs Summary

1	**Priority Need Name**	Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents
	Geographic Areas Affected	NRSA Citywide HOME Consortium Cities
	Associated Goals	Expand Homeownership Opportunities Increase Affordable Homeownership Units Increase Affordable Rental Units Improve Existing Owner Occupied Housing
	Description	The City plans to utilize CDBG and HOME funds to increase and preserve affordable housing opportunities for the community.
	Basis for Relative Priority	
2	**Priority Need Name**	Public Facilities and Infrastructure Improvements
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly

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	Geographic Areas Affected	NRSA Citywide
	Associated Goals	Improve Streets, Sidewalks and Public Facilities Improve Parks and Recreational Facilities Provide Recreation and Education Opportunities
	Description	The City plans to utilize CDBG funds to facilitate improvements to public facilities and infrastructure. The City has an aging infrastructure system that needs to be addresses to improve the quality of life for residents.
	Basis for Relative Priority	
3	**Priority Need Name**	Neighborhood and Community Services
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly
	Geographic Areas Affected	NRSA Citywide
	Associated Goals	Reduce and Prevent Crime Reduce Blighted Conditions
	Description	The City plans to utilize CDBG funds to provide services and activities that directly benefit neighborhoods and the quality of life of residents, especially those that are low- and moderate-income.
	Basis for Relative Priority	
4	**Priority Need Name**	Business and Economic Development
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children
	Geographic Areas Affected	NRSA Citywide
	Associated Goals	Increase Jobs through Economic Development
	Description	The City plans to utilize CDBG funds to increase business and economic development opportunities for low- and moderate-income residents. The City recognizes that economic development is a method to address poverty and increase job opportunities for the community.
	Basis for Relative Priority	

Narrative (Optional)

The City has identified four Priority Needs to be addressed through this Consolidated Plan: Affordable Housing; Public Facilities and Infrastructure Improvements; Neighborhood and Community Services; and Business and Economic Development. The City will allocate CDBG and HOME funds to services, projects and activities that address these needs.

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

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The City does not intend to utilize HOME funds for TBRA.
TBRA for Non-Homeless Special Needs	The City does not intend to utilize HOME funds for TBRA.
New Unit Production	There exists a vast shortage in the number of affordable housing units available to extremely-low and low-income households. Older units often times present prohibitive rehabilitation costs, making new unit production more suitable for increasing affordable housing options. The City will partner with local CHDO's and private developers to produce new units.
Rehabilitation	The majority of the City's housing stock is older. The vast majority was built before 1980. This creates a significant need for rehabilitation services including repair, lead-based paint hazard removal, and weatherization/energy efficiency improvements.
Acquisition, including preservation	There are properties available that are suitable for homeownership and also properties that are suitable for acquisition and rehabilitation. The City will utilize HOME funds to assist low-income homebuyers to acquire units for homeownership. HOME funds wills also be used to assist CHDO's in acquiring and redeveloping properties for low-income homeownership

Table 49 – Influence of Market Conditions

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

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,495,026	90,000	1,455,190	3,040,216	5,980,104	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	572,947	0	806,570	1,379,517	2,291,788	
Continuum of Care	public - federal	Admin and Planning Housing Public Services	1,410,743	0	0	1,410,743	5,642,972	

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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: $		
Section 108	public - federal	Economic Development	3,970,000	0	0	3,970,000	3,970,000	
Section 8	public - federal	Admin and Planning Housing	6,675,656	0	0	6,675,656	26,702,624	

Table 50 - 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

CDBG funds will be leveraged with other state and local funds to implement public improvements, economic development and public service programs. HOME funds are leveraged with private mortgage dollars and buyer contributions. The City is required to Match 12.5 cents for every dollar of HOME spent. This matching requirement is met through volunteer labor provided by CHDO's as well as other sources of private down payment assistance.

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

The City will be acquiring the former IRS site on the riverfront. This land will be redeveloped to create housing and economic development opportunities.

Discussion

OMB Control No: 2506-0117 (exp. 06/30/2018)

SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Covington	Government	Economic Development Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
Kenton County Housing Choice Voucher Program	PHA	Public Housing	Jurisdiction
HOUSING AUTHORITY OF COVINGTON	PHA	Public Housing	Jurisdiction
CENTER FOR GREAT NEIGHBORHOODS OF COVINGTON	CHDO	Ownership Planning Rental	Jurisdiction
Housing Opportunities of Northern Kentucky (HONK)	CHDO	Ownership Rental	Jurisdiction
ENTRYWAY, INC.	CHDO	Ownership Rental	Jurisdiction

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City has a strong history of agencies working together to address community development needs. Covington has a strong core of non-profit and social service agencies that offer services for homeless and low-income persons. These include: The Northern KY Community Action Commission; The Welcome House; The Life Learning Center; Transitions, Inc.; The Women's Crisis Center; Catholic Charities of Northern KY; and the Covington Neighborhood Collaborative. There are also multiple economic development entities that work together on a regional basis to promote economic development initiatives. These include: Tri-Ed; The Catalytic Development Fund; Renaissance Covington; and the Covington Economic Development Authority.

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The region needs to work more closely together to address homelessness and affordable housing issues.

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement			
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	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 52 - Homeless Prevention Services Summary

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

The Welcome House administers the Gaining Access through Programs and Services (GAPS) program. This program aims to quickly identify the needs of homeless persons and refer to them to appropriate needed services such as housing, mental health and employment services. The Life Learning Center is a one-stop shop that offers programs and services for the homeless and referrals to other support agencies.

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

There is always a need for more adequate resources. If resources were available, the City would adequate services available to assist the homeless population and address homelessness issues. The Northern KY region needs to do a better job of addressing homelessness in surrounding cities.

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 need exists for increased availability of affordable housing and additional supportive services for the homeless population. Additional resources from the community and local government, as well as federal and state governments is needed.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Expand Homeownership Opportunities	2020	2024	Affordable Housing	Citywide HOME Consortium Cities	Affordable Housing	HOME: $2,500,000	Direct Financial Assistance to Homebuyers: 300 Households Assisted
2	Increase Affordable Homeownership Units	2020	2024	Affordable Housing	NRSA Citywide HOME Consortium Cities	Affordable Housing	HOME: $1,500,000	Homeowner Housing Added: 10 Household Housing Unit
3	Increase Affordable Rental Units	2020	2024	Affordable Housing	NRSA Citywide	Affordable Housing	CDBG: $1,000,000	Rental units rehabilitated: 50 Household Housing Unit
4	Improve Existing Owner Occupied Housing	2020	2024	Affordable Housing	NRSA Citywide	Affordable Housing	CDBG: $500,000	Homeowner Housing Rehabilitated: 100 Household Housing Unit
5	Improve Streets, Sidewalks and Public Facilities	2020	2024	Non-Housing Community Development	NRSA Citywide	Public Facilities and Infrastructure Improvements	CDBG: $2,200,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 30000 Persons Assisted
6	Improve Parks and Recreational Facilities	2020	2024	Non-Housing Community Development	NRSA Citywide	Public Facilities and Infrastructure Improvements	CDBG: $1,000,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 30000 Persons Assisted

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Reduce and Prevent Crime	2020	2024	Public Housing Non-Housing Community Development	NRSA Citywide	Neighborhood and Community Services	CDBG: $500,000	Public service activities other than Low/Moderate Income Housing Benefit: 30000 Persons Assisted
8	Provide Recreation and Education Opportunities	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	NRSA Citywide	Public Facilities and Infrastructure Improvements	CDBG: $375,000	Public service activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted
9	Increase Jobs through Economic Development	2020	2024	Non-Housing Community Development	NRSA Citywide	Business and Economic Development	CDBG: $250,000 Section 108: $3,970,000	Jobs created/retained: 120 Jobs Businesses assisted: 25 Businesses Assisted
10	Reduce Blighted Conditions	2020	2024	Affordable Housing Non-Housing Community Development	NRSA Citywide	Neighborhood and Community Services	CDBG: $272,942	Housing Code Enforcement/Foreclosed Property Care: 500 Household Housing Unit

Table 53 – Goals Summary

Goal Descriptions

OMB Control No: 2506-0117 (exp. 06/30/2018)

1	**Goal Name**	Expand Homeownership Opportunities
	Goal Description	The City will expand homeownership opportunities to low-income homebuyers through its Homebuyer Assistance Programs.
2	**Goal Name**	Increase Affordable Homeownership Units
	Goal Description	The City will increase affordable homeownership units by partnering with local Community Housing Development Organizations to redevelop properties for sale or lease to own to low-income homebuyers. The city currently has three CHDO partners: The Center for Great Neighborhoods of Covington; Housing Opportunities of Northern KY; and Entryway, Inc.
3	**Goal Name**	Increase Affordable Rental Units
	Goal Description	The City will work with private developers and owners to rehabilitate units for affordable rental.
4	**Goal Name**	Improve Existing Owner Occupied Housing
	Goal Description	The City will allocate funds to homeowner rehabilitation programs to assist low-income homeowners with urgent home repair needs.
5	**Goal Name**	Improve Streets, Sidewalks and Public Facilities
	Goal Description	The City will allocate funds for street and sidewalk improvements, streetscape projects, levy repairs and stabilization, public facility improvements and other infrastructure needs.
6	**Goal Name**	Improve Parks and Recreational Facilities
	Goal Description	The City will allocate funds to improve existing parks, pools and recreational facilities as well as developing new parks and greenspaces.
7	**Goal Name**	Reduce and Prevent Crime
	Goal Description	The City will allocate funds to crime prevention programs and community policing programs. These programs target high crime areas as well as improve community/police relations.

OMB Control No: 2506-0117 (exp. 06/30/2018)

8	**Goal Name**	Provide Recreation and Education Opportunities
	Goal Description	The City will allocate funds to programs and activities that provide recreational and educational opportunities for families and children, especially early literacy programs to improve literacy among local children.
9	**Goal Name**	Increase Jobs through Economic Development
	Goal Description	The City will allocate funds towards economic development loans and business assistance programs to increase job opportunities for low-income residents.
10	**Goal Name**	Reduce Blighted Conditions
	Goal Description	The City will allocate CDBG funds for efforts to reduce blighted conditions such as increased code enforcement efforts and strategic planning to address blighted properties.

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)

It is estimated based on the funding budgeted that 465 extremely low-income, low-income, or moderate-income families will be provided affordable housing throughout the term of the strategic plan.

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

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

N/A

Activities to Increase Resident Involvements

Some of the planned activities in the next year to foster resident involvement, in conjunction with our Resident Councils, are a community garden, summer camp program, teen summer work program, parenting – born learning group, monthly resident council meetings, HUD strong family initiatives, health education and nursing programs, and GED tutoring. Also there will be a new after-school program with the Boys' and Girls' Club in the upcoming year.

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 – 91.215(h)

Barriers to Affordable Housing

Common barriers to affordable housing may be public policies or non-governmental conditions that hamper the development or rehabilitation of affordable housing. These conditions include land use controls, property taxes, state prevailing wage requirements, environmental protection, cost of land, and availability of monetary resources.

Barriers to affordable housing in the City of Covington include lack of available land, lack of monetary resources, cost of property rehabilitation, outdated zoning regulations, local historic preservation guidelines and cost of building permitting and fees. Affordable housing development is complicated and requires significant expertise. Landlords have historically been hesitant to participate in the Housing Choice Voucher program.

A significant barrier to affordable housing is the NIMBY or "Not in My Back Yard" stance. Local communities are not typically open to new affordable housing developments.

Additional barriers include required security deposits for low- and moderate-income families, the lack of available Section 8 Units, and lack of 3 and 4 bedroom units.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The City has developed a new form based zoning code. This new code will make it easier for developers to rehabilitate properties in various neighborhoods. The Housing Choice Voucher Program has created an outreach and incentive program for landlords to participate and allow their units to be rented through the program.

Northern KY Community Action Commission works with landlords that offer affordable housing to educate them on the importance of providing decent, affordable housing. NKCAC is working with other agencies to provide safety net services to help those in search access affordable housing.

The City will work to develop an affordable housing policy and plan to ensure all their residents can afford to live in the community.

SP-60 Homelessness Strategy – 91.215(d)

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

Brighton Center has a Street Outreach program for youth ages 16-22, funded by Health and Human Services. There is an extensive plan for outreach in the community to identify youth and offer services to bring them into safe shelter. If a youth is over 18, a referral to adult shelters is made. Through our Rapid Rehousing Program, Brighton Center staff provide outreach in the community and respond to calls for assistance from community partners and residents. Both outreach programs assess needs and strive to bring homeless individuals into shelter and sustainable housing.

Welcome House and the Veterans Association also offer outreach services to unsheltered persons and assess their needs.

Addressing the emergency and transitional housing needs of homeless persons

Emergency shelter is offered to single women and women with children by Welcome House of NKY. Fairhaven Rescue Mission offers shelter to single men. The Family promise shelter offers services for families. Brighton Center offers emergency shelter for homeless youth. Women's Crisis Center offers assistance to women and children.

The Emergency Shelter of Northern Kentucky is an agency that provides services for adults 18+ experiencing all types of homelessness including chronic. All programs offered by this organization are free. Emergency Shelter of Northern Kentucky is the only shelter in NKY that allows adults to use its street address as their address for job application and other forms as allowed by state law.

During the winter Emergency Shelter of Northern KY offers multiple programs for homeless persons. In particular, 32 emergency, low barrier, safe, shelter beds available to adult men and women. The Emergency Shelter of Northern KY works to remove barriers to entrance to meet immediate shelter needs. ESNKY offers the Mental Health of America program with a minimum of 2 beds for Diversion. The Emergency Shelter also offers a transitional Housing Work Program for 3 men at a time. To participate adult men must be employed and saving 70% of their income. Staff offer housing search assistance to participants and offer on-site case management. Additionally, due to limited ESNKY beds, the Emergency Shelter refers adults and families out of state for shelter beds.

ESNKY offers additional programs during the summer months. The Emergency Shelter offers a Daytime Shower and Laundry Program for adult men and women that are homes or have substandard housing for 20 hours per week. The Transitional Housing Working Program is offered year round. Emergency shelter is offered for men only with direct referrals from NKY hospitals, jails or law enforcement for 1 night stays. During summer months, the ESNKY continues to refer adults and families out of state for shelter beds.

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 best strategy is to prevent homelessness in the first place. A full array of housing options for people, including those with special needs, is required. People are sometimes evicted because they are not in the best option to meet their needs. This often occurs with senior housing, where people really need a higher level of care or need intense case management services or mental health treatment. We could also do a better job of looking at the areas of transition for youth and adults and ensure we have "next step" services to meet their needs.

Many communities are implementing policy-related strategies in terms of evictions, which is helping prevent homelessness.

Providing the typical supportive services such as case management, job training, education, access to benefits, emergency assistance, mental and physical health treatment are all important; however they are not usually funded. People will need support services.

We need to be able to offer the Financial Self Sufficiency (FSS) program to as many people as possible to facilitate the movement of families in public housing to self-sufficiency. We have also seen Individual Development Accounts play a very positive role in helping families save for an education, homeownership, and purchase of a car.

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

Brighton Center administers a Transitional Living program for youth aging out of foster care that could be replicated and taken to scale. Youth are supported with financial assistance to obtain an apartment and then provided the appropriate case management services to connect them to education and workforce services, as well as any other needed services. The National Association for the Education of Homeless Children and Youth describes many models in their research that are working for youth.

HUD has highlighted many innovative models for housing in their "Edge" newsletter, including workforce housing, housing connected to medical care, Veteran housing, etc.

KHC has funding some innovative models related to assisted living and workforce housing.

Covington Independent Schools try to identify families in need to try to remove housing barriers before families become homeless again. The Project Home Coordinator works with HUD and Section 8 to assess the wait list for housing assistance and assist the families with obtaining required documents to enter into one of these programs.

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

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

All HUD funded acquisition and rehabilitation programs strictly follow the HUD Lead Safe Rule. All lead hazards must be identified and addressed in any assisted housing. The City also was successful in receiving a grant from the HUD Office of Lead Hazard Control and Healthy Homes. This grant will be used to create lead-safe units for families.

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

The vast majority of existing homes in the City were built prior to 1980. Due to the large inventory of older homes, there is a high rate of lead-based paint 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 24CFR 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 – 91.215(j)

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

Programs funded with CDBG and HOME provide homeowner rehabilitation and repairs, production of new rental and homeowner units and down payment assistance for income-eligible homebuyers. These activities, that produce and preserve affordable housing, are important in reducing the number of poverty-level families in the city. Using CDBG funding, city programs also support activities that provide public services and recreational activities.

Housing Choice Voucher (HCV) agencies in Kenton and Campbell Counties administer Family Self-Sufficiency Programs and Section 8 to Homeownership Programs to guide HCV families on a path of financial stability.

The city implements the federally required Section 3 program, where applicable, to ensure that employment or contracting opportunities generated by HUD funded projects give preference to qualified low- and very-low income persons or business concerns.

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

City departments coordinate regularly on initiatives to reduce poverty. The Neighborhood Services Department works with the Business Development Department to create low-income employment opportunities for residents. The Neighborhood Service Department works with public housing agencies to transition renters into homeownership programs. The City works closely with non-profit agencies that provide housing counseling and self-sufficiency programs.

SP-80 Monitoring – 91.230

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

All HUD funded activities and programs are administered and managed by the Neighborhood Services Department. This department is responsible for all of the principal tasks of administering HUD grants including: coordinating Consolidated Planning activities; programmatic and financial reporting requirements; preparing the Consolidated Plan, Annual Action Plan and CAPER; ensuring compliance with all other federal laws and regulations related to CDBG and HOME funds.

Monitoring is a critical and ongoing task related to carrying out activities funded with CDBG and HOME with effectiveness and efficiency.

All CDBG and HOME activities are monitored annually by the Federal Grants Manager, with assistance from the CDBG/HOME Coordinator, to ensure compliance with all program rules and regulations. An onsite monitoring schedule is created for all external monitoring requirements i.e. CHDO annual monitoring and past projects funded with CDBG or HOME that require ongoing monitoring. External monitoring will be conducted by the Federal Grants Manager, with assistance from the CDBG/HOME Coordinator. No CDBG or HOME funds are released for any project or activity without prior review by the Federal Grants Manager.

- CDBG/HOME program participant files: all files related to CDBG and HOME homeowner rehab and homebuyer activities are reviewed by the Federal Grants Manager, with assistance from the CDBG/HOME Coordinator, prior to the commitment of funds. This review includes applicant eligibility, property qualification, underwriting, subsidy layering, appropriate use of funds, costs reasonableness, environmental review requirements, construction documents, bidding documents, costs estimates, etc.
- Other HOME projects: the City conducts on-site inspections of all HOME rental projects during the period of affordability as required by §92.504(d).
- Other CDBG activities: the Federal Grants Manager, with assistance from the CDBG/HOME Coordinator, reviews all CDBG activities prior to the commitment/expenditure of funds. This review includes project eligibility per the Annual Action Plan, meeting a National Objective, appropriate use of funds, cost reasonableness, environmental review requirements, etc. Activities such as Code Enforcement that primarily pay staff costs will be reviewed in an ongoing manner throughout the program year to ensure that stated goals are being met and activities being performed are eligible.
- Davis Bacon: the City will consult with any contractors or partner agencies regarding the applicability of Davis Bacon and the program requirements. Staff will conduct site visits,

employee interviews, and check weekly payroll forms for accuracy for any projects that require Davis Bacon compliance.

Fair Housing/Section 3 Compliance: The City ensures compliance with Fair Housing and Section 3 during the process of awarding grant agreements to selected agencies and throughout the program year. Documentation is maintained on efforts to support low- and moderate-income residents.

Expected Resources

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

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,495,026	90,000	1,455,190	3,040,216	5,980,104	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	572,947	0	806,570	1,379,517	2,291,788	

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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: $		
Continuum of Care	public - federal	Admin and Planning Housing Public Services	1,410,743	0	0	1,410,743	5,642,972	
Section 108	public - federal	Economic Development	3,970,000	0	0	3,970,000	3,970,000	
Section 8	public - federal	Admin and Planning Housing	6,675,656	0	0	6,675,656	26,702,624	

Table 54 - Expected Resources – Priority Table

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

CDBG funds will be leveraged with other state and local funds to implement public improvements, economic development and public service programs. HOME funds are leveraged with private mortgage dollars and buyer contributions. The City is required to Match 12.5 cents for every dollar of HOME spent. This matching requirement is met through volunteer labor provided by CHDO's as well as other sources of private down payment assistance.

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

The City will be acquiring the former IRS site on the riverfront. This land will be redeveloped to create housing and economic development opportunities.

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Expand Homeownership Opportunities	2020	2024	Affordable Housing	NRSA Citywide HOME Consortium Cities	Affordable Housing	HOME: $500,000	Direct Financial Assistance to Homebuyers: 66 Households Assisted
2	Increase Affordable Homeownership Units	2020	2024	Affordable Housing	NRSA Citywide HOME Consortium Cities	Affordable Housing	HOME: $869,594	Homeowner Housing Added: 6 Household Housing Unit
3	Increase Affordable Rental Units	2020	2024	Affordable Housing	NRSA Citywide	Affordable Housing	CDBG: $380,000	Rental units constructed: 19 Household Housing Unit
4	Improve Existing Owner Occupied Housing	2020	2024	Affordable Housing	NRSA Citywide	Affordable Housing	CDBG: $182,739	Homeowner Housing Rehabilitated: 20 Household Housing Unit
5	Improve Streets, Sidewalks and Public Facilities	2020	2024	Non-Housing Community Development	NRSA Citywide	Public Facilities and Infrastructure Improvements	CDBG: $1,195,812	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15000 Persons Assisted

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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Improve Parks and Recreational Facilities	2020	2024	Non-Housing Community Development	NRSA Citywide	Public Facilities and Infrastructure Improvements	CDBG: $490,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15000 Persons Assisted
7	Reduce and Prevent Crime	2020	2024	Public Housing Non-Housing Community Development	NRSA Citywide	Neighborhood and Community Services	CDBG: $110,000	Public service activities other than Low/Moderate Income Housing Benefit: 30000 Persons Assisted
8	Provide Recreation and Education Opportunities	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	NRSA Citywide	Neighborhood and Community Services	CDBG: $120,000	Public service activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted
9	Increase Jobs through Economic Development	2020	2024	Non-Housing Community Development	NRSA Citywide	Business and Economic Development	CDBG: $50,000 Section 108: $500,000	Jobs created/retained: 14 Jobs Businesses assisted: 5 Businesses Assisted
10	Reduce Blighted Conditions	2020	2024	Affordable Housing Non-Housing Community Development	NRSA Citywide	Affordable Housing Neighborhood and Community Services	CDBG: $136,646	Housing Code Enforcement/Foreclosed Property Care: 100 Household Housing Unit

Table 55 – Goals Summary

Goal Descriptions

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1	**Goal Name**	Expand Homeownership Opportunities
	Goal Description	The City will allocate HOME funds for Homebuyer Assistance Programs. These programs assist low-income homebuyers by providing interest-free, deferred loans to cover lender required down payment and closing costs.
2	**Goal Name**	Increase Affordable Homeownership Units
	Goal Description	The City will allocate HOME funds to create new housing for low-income homeownership. The City will partner with Community Housing Development Organizations and private developers to acquire and rehabilitate homes for sale to low-income homebuyers.
3	**Goal Name**	Increase Affordable Rental Units
	Goal Description	The City will allocate CDBG funds to the Upper Floor Residential Rehab Program. This program provides loans to owners of mixed-use buildings to redevelop vacant, upper-floor space into new affordable rental units for low-income renters.
4	**Goal Name**	Improve Existing Owner Occupied Housing
	Goal Description	The City will allocate CDBG funds to the Homeowner Repair Program. This program provides forgivable loans to low-income homeowners to address urgent home repair needs such as furnaces, water heaters, roof and gutter systems, and other life safety issues.
5	**Goal Name**	Improve Streets, Sidewalks and Public Facilities
	Goal Description	The City will allocate CDBG funds for public improvements including street repairs, street resurfacing, streetscape improvement projects, levy stabilization, and other roadway repairs.
6	**Goal Name**	Improve Parks and Recreational Facilities
	Goal Description	The City will allocate CDBG funds for improvements to public parks and recreational facilities. This will include new park equipment, repairs and upgrades to existing parks, and additional park amenities.
7	**Goal Name**	Reduce and Prevent Crime
	Goal Description	The City will allocate CDBG funds for crime prevention efforts in targeted high crime areas and community policing programs.

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8	**Goal Name**	Provide Recreation and Education Opportunities
	Goal Description	The City will allocate CDBG funds for recreation programs and educational opportunities for children and youth.
9	**Goal Name**	Increase Jobs through Economic Development
	Goal Description	The City will allocate CDBG funds for economic development initiatives that create and/or retain low- and moderate-income jobs.
10	**Goal Name**	Reduce Blighted Conditions
	Goal Description	The City will allocate CDBG funds for activities that are aimed at reducing blighted properties and conditions in the City. Activities planned include increased code enforcement and planning and capacity building for non-profits to create housing development programs.

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Projects

AP-35 Projects – 91.220(d)

Introduction

During the Consolidated Planning process, the city prioritizes identified needs and allocates funds strategically to achieve the most community impact. Through the city's annual budgeting process the following projects were funded to implement these strategic goals. The Annual Action Plan includes a budget which encompasses revenue from three sources. These include new formula based entitlements, program income/recaptured funds, and carry-over/unexpended funds.

Projects

#	Project Name
1	CDBG Administration
2	HOME Program Administration
3	Rehab Administration
4	Parks and Recreation Staff Delivery Costs
5	Homebuyer Assistance Program
6	CHDO Housing Development
7	Homeowner Repair Program for Emergency Repairs
8	Upper Floor Residential Rent Rehab Program
9	Public Improvements
10	Park Improvements
11	Code Enforcement
12	Early Literacy Program
13	Police Anti-Crime Program

Table 56 – Project Information

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

The City has identified priority projects based on staff and community input. The allocation of CDBG funds will be done in a strategic manner to maximize the benefit to the community. Multiple CDBG projects will coincide with each other to leverage the impact. For example, public improvements and streetscape enhancements occurring in targeted areas will be done in coordination with park improvements, code enforcement, crime prevention efforts, property rehab programs, and economic development initiatives.

HOME funding will be prioritized to address the shortage of affordable housing and the less than desirable homeownership rate. The HOME program will support increasing affordable housing and

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homeownership opportunities through down payment assistance programs and by creating new affordable homeownership and lease to own units.

The city has a large inventory of aging housing stock, both owner and rental, in need of rehabilitation. Assistance to low-income homeowners to address home repair issues is an underserved need. Some of the obstacles to addressing this underserved need include: lack of adequate funding mechanisms; lack of qualified contractors; and ability to reach homeowners in need. To address this need, the City will continue to fund homeowner rehab programs, will market the programs to potential contractors, and will partner with local agencies who have contact with homeowners in need.

AP-38 Project Summary

Project Summary Information

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1	**Project Name**	CDBG Administration
	Target Area	NRSA Citywide
	Goals Supported	Increase Affordable Homeownership Units Increase Affordable Rental Units Improve Existing Owner Occupied Housing Improve Streets, Sidewalks and Public Facilities Improve Parks and Recreational Facilities Reduce and Prevent Crime Provide Recreation and Education Opportunities Increase Jobs through Economic Development Reduce Blighted Conditions
	Needs Addressed	Affordable Housing Public Facilities and Infrastructure Improvements Neighborhood and Community Services Business and Economic Development
	Funding	CDBG: $350,621
	Description	This project funds the administration of the CDBG Program and CDBG community development planning activities.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Program administration costs include staff and related costs required for planning activities, overall program management, coordination, monitoring, reporting, recordkeeping and evaluation. Planning activities that will occur in PY 2020 include affordable housing planning and economic development planning.
2	**Project Name**	HOME Program Administration
	Target Area	HOME Consortium Cities
	Goals Supported	Expand Homeownership Opportunities Increase Affordable Rental Units
	Needs Addressed	Affordable Housing

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	Funding	HOME: $110,004
	Description	This project funds administrative costs for the HOME Program.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Administration of the HOME Program will benefit approximately 72 low-income families through homeownership programs and housing development.
	Location Description	HOME Program funded activities occur city-wide in the Northern Kentucky HOME Consortium cities of Covington, Ludlow, Newport, Bellevue and Dayton.
	Planned Activities	Program administration costs include staff and related costs required for overall program management, coordination, monitoring, reporting, recordkeeping and evaluation.
3	**Project Name**	Rehab Administration
	Target Area	NRSA Citywide
	Goals Supported	Increase Affordable Rental Units Improve Existing Owner Occupied Housing Reduce Blighted Conditions
	Needs Addressed	Affordable Housing
	Funding	CDBG: $91,059
	Description	This project funds staff and related delivery costs to administer CDBG funded residential rehab programs.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	The administration of rehab programs will benefit approximately 39 LMI homeowners/renters.
	Location Description	Rehab programs are available city-wide to low/mod income homeowners and renters.

	Planned Activities	Funds provide for staffing to support program delivery costs for CDBG funded residential rehab programs. Activities include: inspections, cost estimates, preparing specifications, qualifying applicants, processing draw requests/payments, etc. Rehab Admin funds are also being utilized to administer the City's Lead Hazard Reduction Program which is a grant awarded to the City from HUD's Office of Lead Hazard Control and Healthy Homes.
4	**Project Name**	Parks and Recreation Staff Delivery Costs
	Target Area	NRSA Citywide
	Goals Supported	Improve Parks and Recreational Facilities Provide Recreation and Education Opportunities Reduce Blighted Conditions
	Needs Addressed	Public Facilities and Infrastructure Improvements Neighborhood and Community Services
	Funding	CDBG: $30,440
	Description	This project funds a portion of the salary costs for staff to administer CDBG funded park improvements and recreation programs.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	These funds will benefit low/mod income residents who utilize city parks and recreation programs.
	Location Description	Recreation activities will occur at city park facilities that serve low/mod income neighborhoods. Park Improvements will occur at Goebel Park and Barb Cook Park and other neighborhood parks to be identified.
	Planned Activities	Project delivery costs associated with CDBG funded park improvements and recreation programs.
5	**Project Name**	Homebuyer Assistance Program
	Target Area	HOME Consortium Cities
	Goals Supported	Expand Homeownership Opportunities Increase Affordable Homeownership Units
	Needs Addressed	Affordable Housing
	Funding	HOME: $500,000

	Description	This project is an interest-free, deferred loan program to assist low-income homebuyers with lender required down payment and closing costs.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit approximately 66 low-income homebuyers.
	Location Description	This program is available to low-income homebuyers city-wide in the Northern Kentucky HOME Consortium member cities of Covington, Ludlow, Newport, Bellevue and Dayton.
	Planned Activities	This is an interest-free, deferred loan program to assist low-income homebuyers with lender required down payment and closing costs.
6	**Project Name**	CHDO Housing Development
	Target Area	HOME Consortium Cities
	Goals Supported	Expand Homeownership Opportunities Increase Affordable Homeownership Units Reduce Blighted Conditions
	Needs Addressed	Affordable Housing
	Funding	HOME: $869,594
	Description	This project funds the required HOME CHDO set-aside for the creation of affordable housing units by qualified local CHDO's using the HOME Program. The City prioritizes the partnership with CHDO's and funds CHDO activities more than the minimum required set-aside.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit approximately 6 low-income households.
	Location Description	CHDO housing development will occur at 2744 Latonia Avenue and 715 Saratoga Street (Newport). Other potential addresses are currently being identified.
	Planned Activities	Single-family housing rehab or new construction to create new affordable housing units for homeownership, rental or lease to own.

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7	**Project Name**	Homeowner Repair Program for Emergency Repairs
	Target Area	NRSA Citywide
	Goals Supported	Improve Existing Owner Occupied Housing Reduce Blighted Conditions
	Needs Addressed	Affordable Housing
	Funding	CDBG: $182,739
	Description	The City's Homeowner Repair Program is designed to assist low/mod income homeowners with urgent home repair needs. The Program will assist homeowners with emergency repairs such as furnace, electrical, plumbing, roof and sewer lateral repairs.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	This activity will assist approximately 20 households. This activity is for low/mod income households only with a preference given to elderly, disabled and veteran households.
	Location Description	This activity is available city-wide on a first-come, first-served basis.
	Planned Activities	Single-family, owner-occupied, residential rehab to address urgent/emergency home repairs.
8	**Project Name**	Upper Floor Residential Rent Rehab Program
	Target Area	NRSA Citywide
	Goals Supported	Increase Affordable Rental Units Reduce Blighted Conditions
	Needs Addressed	Affordable Housing
	Funding	CDBG: $380,000
	Description	This project funds the Upper Floor Residential Rent Rehab Program. This program provides loans to property owners to redevelop vacant, upper-floor space in mixed-use buildings into affordable rental units.
	Target Date	6/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	This project will benefit approximately 19 low/mod income households.
	Location Description	Units at 809 Madison Avenue, 302 W. MLK BLVD and 1131 Holman Avenue will be rehabilitated under this project. Other addresses will be identified based on an open application process. The program is available city-wide, targeted to vacant, upper-floor space in mixed-use buildings.
	Planned Activities	Rehabilitation of vacant, upper-floor space in mixed-use buildings into affordable rental-units.
9	**Project Name**	Public Improvements
	Target Area	NRSA Citywide
	Goals Supported	Improve Streets, Sidewalks and Public Facilities Reduce Blighted Conditions
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	CDBG: $1,195,813
	Description	This project will fund public improvements including street resurfacing, installation of ADA sidewalk ramps, and streetscape enhancements.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	This project will fund activities that will occur in qualified low/mod income census tracts/block groups to benefit low/mod income households on an area basis.
	Location Description	Street resurfacing is scheduled to be performed on deteriorated streets in the central section of the City based on a condition survey; installation of ADA ramps will coincide with street resurfacing where ramps do not already exist; streetscape enhancements will occur on 6th Street/Scott Street and in the Lewisburg neighborhood, road and hillside repairs will occur on Western Avenue, bridge/overpass repairs will occur on Caroline Avenue, levy stabilization will occur on the Licking River levy, public facility improvements will occur at the Carnegie Arts Center.

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	Planned Activities	Street resurfacing, installation of ADA sidewalk ramps, streetscape enhancements, road and bridge repairs, levy stabilization, and public facility improvements.
10	**Project Name**	Park Improvements
	Target Area	NRSA Citywide
	Goals Supported	Improve Parks and Recreational Facilities Provide Recreation and Education Opportunities Reduce Blighted Conditions
	Needs Addressed	Public Facilities and Infrastructure Improvements Neighborhood and Community Services
	Funding	CDBG: $490,000
	Description	This project will fund facility improvements to the City's parks, recreation facilities and trails system. A parks plan was completed to prioritize and set a schedule for ongoing parks improvements.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	This project will fund improvements to City park facilities that serve low/mod income residents.
	Location Description	Park improvements/facility upgrades will occur at the following park facility locations: Barb Cook Park; Goebel Park. There will also be small improvements to all City park facilities that include the installation of park signage, picnic tables, trash cans, grills, bike racks and dog waste stations. All park improvements will occur at park facilities that serve low/mod income neighborhoods.
	Planned Activities	Activities will include the installation of a new dog park, new playground equipment, new basketball and multi-sport courts, park signage, picnic tables, trash cans, bike racks, dog waste stations, and design work for future park improvements.
11	**Project Name**	Code Enforcement
	Target Area	NRSA Citywide
	Goals Supported	Reduce and Prevent Crime Reduce Blighted Conditions

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	Needs Addressed	Neighborhood and Community Services
	Funding	CDBG: $34,074
	Description	This project funds code enforcement staff to perform targeted code enforcement in low/mod income census tracts. This enforcement will occur in designated deteriorating areas and in conjunction with other investments meant to arrest the decline of the area.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Code Enforcement is performed in targeted low/mod income census tracts/block groups to benefit low/mod income residents.
	Location Description	Targeted low/mod census tracts/block groups that have been designated as deteriorated areas receiving other investments to arrest the decline of the area.
	Planned Activities	Code enforcement officers will perform exterior housing/building code inspections to address blighted property conditions. These inspections will occur in targeted areas designated as deteriorated. These inspections will coincide with other City investments meant to address the decline of the area. These other investments will include public/infrastructure improvements, public facility improvements, and housing rehabilitation.
12	**Project Name**	Early Literacy Program
	Target Area	Citywide
	Goals Supported	Provide Recreation and Education Opportunities
	Needs Addressed	Neighborhood and Community Services
	Funding	CDBG: $120,000
	Description	This project funds the Covington Early Literacy Initiative/Read Ready Program which is an early literacy campaign targeted to children from birth to the 3rd grade.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	This project funds activities that will serve Covington children and parents who live in low/mod income areas.

	Location Description	This activity is available to families whose children attend schools located within the boundaries of the Covington public and private school systems.
	Planned Activities	The City will organize and manage a collaborative between multiple agencies to provide an early literacy initiative for children in the City. This program will serve children from birth to the 3rd grade. The Covington Early Literacy Initiative/Read Ready Program is a CDBG public service program that aims to increase the academic success of Covington school children by focusing on improving early literacy. This initiative will be administered by the City and will utilize two research based early literacy apps, Rx for Success and Foot Steps 2 Brilliance, to transform the academic success of Covington school children. The City will hire a contractor to administer the program by marketing its use to local schools, pre-schools, kindergarten schools, after-school programs, and social service agencies that work with children. The program will also be marketed to parents to increase their participation in their child's literacy.
13	**Project Name**	Police Anti-Crime Program
	Target Area	NRSA Citywide
	Goals Supported	Reduce and Prevent Crime
	Needs Addressed	Neighborhood and Community Services
	Funding	CDBG: $110,000
	Description	This project funds additional police patrols, community policing and crime prevention efforts at the City Heights public housing site in cooperation with the Housing Authority of Covington and in targeted areas of high crime as identified by the Police Department.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	This project will fund activities that benefit all residents in targeted low-mod income census tracts on an area basis.
	Location Description	City Heights public housing complex and targeted high crime areas identified by the Police Department.
	Planned Activities	Additional police patrols in targeted areas of high crime, community policing strategies, crime prevention efforts.

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AP-50 Geographic Distribution – 91.220(f)

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

The City of Covington has all low/mod income census tracts in the section of the city north of Interstate 275. CDBG activities are directed to these areas to benefit low/mod income residents on an area basis. For Program Year 2020-2021, CDBG funds will be strategically invested geographically to maximize public benefit. Multiple CDBG projects will coincide with each other to leverage the impact. For example, public improvements and streetscape enhancements occurring in targeted areas will be done in coordination with park improvements, code enforcement, crime prevention efforts, property rehab programs, and economic development initiatives. The City will identify targeted areas of need and focus multiple CDBG investments to these areas.

HOME funds for homebuyer assistance are available city-wide in all Consortium cities. There is no targeting of homebuyer assistance funds. HOME housing development will occur in areas that have received previous housing development funds to continue the revitalization of those areas.

Geographic Distribution

Target Area	Percentage of Funds
NRSA	15
Citywide	85
HOME Consortium Cities	100

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City plans to focus the investment of CDBG funds into targeted geographic areas of need. Multiple CDBG activities will be coordinated together to maximize the impact and the public benefit. For example, in areas where street resurfacing occurs, the City will also look to do other public improvements i.e. streetscape enhancements, park improvements, code enforcement and crime prevention efforts. These activities will also be leveraged with private investments and other grant funds to increase the impact of the CDBG funds.

Some programs are targeted to individual households in need, not geographic areas. Programs like homeowner rehabilitation and homeownership assistance are available city-wide to benefit all eligible households who may need the assistance.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Covington invests federal funds in the development of rental and homeownership units and the rehabilitation and repair of existing homeowner units. This section shows specific goals for the number of homeless, non-homeless, and special needs households that will be provided affordable housing during the 2020-21 program year. Also shown is the number of affordable housing units that will be provided with CDBG and HOME funds. Programs that will provide these units through CDBG are: the Homeowner Repair Program and the Upper Floor Residential Rehab Program. Programs that will provide these units through HOME are: the Homebuyer Assistance Program and CHDO housing development.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	111
Special-Needs	0
Total	111

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	25
Rehab of Existing Units	20
Acquisition of Existing Units	66
Total	111

Table 59 - One Year Goals for Affordable Housing by Support Type

Discussion

The CDBG Homeowner Repair Program will assist the rehab of 20 units.

The CDBG Upper Floor Residential Rehab Program will assist the rehab of 19 units.

The Homebuyer Assistance Program will assist in the acquisition of 66 existing units.

Housing Opportunities of Northern Kentucky (HONK), The Center for Great Neighborhoods of Covington (CGN) and Entryway, Inc. serve as CHDOs for the Northern Kentucky HOME Consortium. These organizations will utilize our CHDO set-aside funds for projects within the boundaries of the Consortium. CHDO set-aside funds will create 6 new or rehabbed units. They are primarily

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homeownership but they may be lease-purchase projects.

AP-60 Public Housing – 91.220(h)

Introduction

The Housing Authority of Covington (HAC) 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). HAC also administers public housing new construction, rehabilitation and modernization activities, and home ownership opportunity programs.

The Community Housing Resource Group is a joint effort, formed through a Consortium, between the City of Covington and the Housing Authority of Covington to administer the Section 8 Housing Choice Voucher Program. Section 8 assists low and very low-income families, the elderly and disabled to afford decent, safe and sanitary housing in the private market.

Actions planned during the next year to address the needs to public housing

To address the continued need for public, affordable housing the Housing Authority of Covington and the City of Covington will continue to implement public housing programs and Housing Choice Voucher (HCV) programs respectively. Both agencies have many families on their respective waiting lists indicating the continued shortage of available, affordable rental housing. New families will be brought into the programs as soon as public housing units or Housing Choice vouchers become available. The HCV program holds monthly briefing sessions to enroll new families as soon as vouchers become available.

HCV staff will continue to implement a landlord recruitment program. There is currently a shortage of landlords in the service area willing to participate in the program. In PY 2019, HCV staff implemented an incentive program in an effort to recruit new landlords and new available units to the program.

HCV staff is purchasing new technology systems for daily operations that will increase efficiencies and reduce costs. New project management software is also being procured.

There will be initiatives to improve public housing facilities including building and infrastructure improvements, security installations and upgrades. There will be expansion of homeownership and resident self-sufficiency programs for public housing and HCV families.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Housing Authority of Covington's Resident Services Department provides leadership and program support for Covington Public Housing programs. The Housing Authority of Covington's Resident Services Department is funded through both federal and private grants. The mission of the Housing Authority of Covington 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. The Housing Authority of Covington's objectives of its Resident Services Department are to provide quality programming, as well as resources, to low income families to address the barriers to economic self-sufficiency.

The Housing Authority of Covington collaborates with many community organizations to serve the public housing resident population.

The City of Covington Housing Choice Voucher Department administers a Family Self-Sufficiency Program to assist families to work towards economic self-sufficiency and also administers a homeownership program. This program allows participating families to use their Housing Choice Vouchers towards the purchase of a home rather than rent.

The Neighborhood Service Department works with these public housing agencies to refer families to HOME funded homeownership assistance programs.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The PHA is not designated as troubled.

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City of Covington does not directly fund homeless programs or activities with HOME or CDBG funds. The City will continue to support and work with local homeless service providers and the Region III Continuum of Care to address the needs of homeless members of the community. The Region III Continuum of Care's goal is to end homelessness through support programs, rapid re-housing and permanent housing opportunities. The Continuum of Care developed a Ten Year Plan to End Chronic Homelessness in 2008. The City of Covington and Northern Kentucky HOME Consortium understand the detrimental impact that homelessness can have on our residents and are committed to working with our local organizations, the NKADD, the Kentucky Housing Corporation and HUD to develop a comprehensive, coordinated approach to ending chronic homelessness. Covington signed on to HUD's Mayor's Challenge to End Veteran Homelessness in 2014.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The City will continue to support the Continuum of Care and the local agencies that offer homeless support services. These agencies include Welcome House of Northern KY, Brighton Center, NorthKey, Transitions, Inc. and the Center for Independent Living Options.

These agencies manage multiple programs that address the needs of the homeless population. Welcome House administers the Gaining Access through Programs and Support (GAPS) program which assists homeless individuals and families to connect with assistance programs and housing. Transitions, Inc. manages the Permanent Housing Program which identifies needs and connects the homeless population to support programs and housing assistance.

Welcome House, Brighton Center and the Veterans Association offer outreach services to unsheltered persons and assess their needs.

Brighton Center has a Street Outreach program for youth ages 16-22, funded by Health and Human Services. There is an extensive plan for outreach in the community to identify youth and offer services to bring them into safe shelter. If a youth is over 18, a referral to adult shelters is made. Through our Rapid Rehousing Program, Brighton Center staff provide outreach in the community and respond to calls for assistance from community partners and residents. Both outreach programs assess needs and strive to

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bring homeless individuals into shelter and sustainable housing.

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency shelter is offered to single women and women with children by Welcome House of NKY. The Emergency Shelter of NKY provides shelter to single men and women. Fairhaven Rescue Mission offers shelter to single men. The Family promise shelter offers services for families. Brighton Center provides emergency shelter for homeless youth.

The Emergency Shelter of Northern Kentucky is a non-HUD funded agency that provides services for adults 18+ experiencing all types of homelessness including chronic. All programs offered by this organization are free. Emergency Shelter of Northern Kentucky is the only shelter in NKY that allows adults to use its street address as their there address for job application and other forms as allowed by state law.

Transitions, Inc. operates programs that provide transitional housing with intensive case management, outreach, employment services, psychiatric nursing services, mental health case management, and life skills assistance.

Welcome House's GAPS program works with homeless individuals and families to address their transitional housing needs while also working with them on permanent housing solutions.

Brighton Center and Welcome House are participating in an innovative program with KHC to work with Covington and Erlanger schools to provide TBRA assistance to homeless families and unaccompanied youth. The goal is to keep the youth in school and get the families housed. This collaboration has worked well and should be replicated. We know there is additional need for housing for unaccompanied youth.

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

Permanent housing for the homeless is a top priority for this region. The City will continue to support the efforts of the Continuum of Care and the local agencies that address these needs. These agencies include Welcome House of Northern KY, NorthKey, the Center for Independent Living Options and Transitions, Inc.

These agencies administer multiple programs to assist homeless individuals make the transition to

permanent housing and independent living. These programs include:

- Center for Independent Living-Housing for Persons with Disabilities: supportive housing program utilizing scattered site units and providing support services for homeless individuals with disabilities
- Transitions, Inc.-Permanent Housing Program: combines four previous housing programs operated by Transitions, Inc.; provides homeless services and case management to homeless individuals at 4 project sites; provided direct assistance to 36 homeless individuals and families
- Welcome House-Rapid Re-Housing Projects: Tenant Based Rental Assistance programs with supportive services focusing on moving homeless families with children to permanent housing
- Welcome House- GAPS: program utilizes a Housing First approach; focuses on moving participants from emergency shelters into permanent housing

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The Region III Continuum of Care includes agencies that are working to reduce homelessness and to create programs to prevent homelessness. Agencies that administer programs to assist individuals and families to avoid becoming homeless include Brighton Center, NorthKey, Welcome House of Northern KY and Transitions, Inc. The City will continue to support these efforts.

Discussion

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Barriers to affordable housing in the City of Covington include lack of available land, lack of monetary resources, cost of property rehabilitation, outdated zoning regulations, local historic preservation guidelines and cost of building permitting and fees. There has also been hesitancy from property owners to participate in public/affordable housing programs. There are also some regional barriers that exist mostly from neighboring cities and communities not creating affordable housing in their neighborhoods. Many of the low- and moderate income jobs that are available are located in areas that have insufficient affordable housing options. The region also needs to improve transportation portals that reach available job opportunities.

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

The City of Covington has drafted and will soon approve a complete re-write of the City's current zoning ordinances. There are provisions in the current zoning code that could have negative effects on affordable housing development. Factors that currently exist that will be modified to be less onerous to development include: density limitations; rules on infill housing development; allowances for duplexes in certain areas; allowing additional units to be added to single-family residences; allowing accessory structures i.e. carriage houses; and easing complex local historic preservation guidelines.

The City is also urging neighboring communities to address the lack of affordable housing in their cities as well as the lack of viable transportation to job centers.

Discussion:

The City creates affordable housing opportunities through the Homebuyer Assistance Program, HOME Housing Development and the Upper Floor Residential Rehab Program. The City preserves affordable housing through its residential rehab programs.

AP-85 Other Actions – 91.220(k)

Introduction:

Described below are the city's planned actions to carry out the following strategies outlined in the Consolidated Plan.

Actions planned to address obstacles to meeting underserved needs

There are obstacles to meeting underserved needs that include: 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. The City and local support agencies do not have the adequate monetary resources to meet all of the community development needs. The City has seen a large increase in market rate housing development. While this has been beneficial to the City in many ways, it has also increased the cost of housing and made affordable housing options less available. The community's unmet demand for permanent affordable housing is evidenced by the long waiting lists for public housing and Housing Choice Voucher assistance. The Covid-19 pandemic has had a detrimental effect on the business community. The City will need to assist businesses to avoid job losses.

To City will attempt to address these underserved needs, by creating programs and activities funded with CDBG and HOME that will create and preserve affordable housing opportunities through homeownership programs, housing development, and housing rehabilitation programs. CDBG and HOME funds will be leveraged with other funding sources and CDBG funded activities will be coordinated together to maximize the public benefit. Outreach will be expanded to ensure that the public is aware of available resources and programs. The City has partnered with local agencies who assist underserved populations to promote CDBG and HOME funded programs and activities that are available. The Housing Choice Voucher Program has instituted incentives for landlords to participate in the Section 8 Program.

To address underserved needs, all CDBG and HOME investments (except for administration and planning activities) for program year 2020-21, will directly benefit low/mod income residents.

Actions planned to foster and maintain affordable housing

The City will invest HOME and CDBG funds in the following activities to foster and maintain affordable housing:

Homebuyer Assistance Program: The City offers interest-free, deferred, forgivable loans to assist low-income homebuyers with lender required down payment and closing costs. This program's goal is to increase homeownership among low-income households and expand housing choice by allowing buyers

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to purchase homes throughout the Consortium member cities of Covington, Ludlow, Newport, Bellevue and Dayton.

CHDO Housing Development: A CHDO is a private nonprofit, community-based service organization that has achieved a special designation as a developer of affordable housing. The City of Covington is required to reserve no less than 15 percent of HOME funds for investment in housing to be developed by CHDOs. The City has been very successful in this housing development partnership and thus is budgeting 60% of the total HOME funds available to CHDO Housing Development. The City will solicit proposals from its CHDO partners for this funding.

Owner-Occupied Housing Rehab: The City offers forgivable loans for low/mod income homeowners to address urgent home repair needs or to alleviate code enforcement cited exterior code violations. The City will also be administering a lead based paint hazard reduction program as a result of a new HUD grant award from the Office of Lead Hazard Control and Healthy Homes.

Upper Floor Residential Rehab Program: This program provides loans to property owners to create new affordable rental units in vacant, upper floor space in mixed-use buildings.

Actions planned to reduce lead-based paint hazards

The City of Covington will comply with HUD's Lead Safe Housing Rule by strictly adhering to the City's implemented Lead Based Paint Policy as follows:

All homes that were built pre-1978:

Homebuyer Program: A visual assessment is performed to identify any deteriorated paint at or in excess of de-minimis standards and notification of the results are passed to homebuyer. Paint stabilization utilizing safe work practices by a RRP Certified Contractor is required for paint deterioration above de-minimis followed by obtainment of Clearance testing.

Rehabilitation Program: A visual assessment is performed to identify any deteriorated paint at or in excess of de-minimis standards and notification of the results are passed to homeowner. Additional steps are outlined below as it pertains to funding amount. (Funding amount is per unit rehabilitation hard costs and do not include costs of lead hazard evaluation and reduction.)

$0.00 - $5,000.00: "Do no harm" approach. Lead safety requirements cover only the surfaces being disturbed. Presume surfaces contain lead-based paint. Work which disturbs painted surfaces presumed to contain lead-based paint is done using lead safe work practices by a RRP Certified Contractor and clearance of the worksite is performed at the end of the job (unless it is a very small "de minimis" scale

project) to ensure that no lead dust hazards remain in the work area.

$5,001.00 - $25,000.00: Identify and control lead hazards. Identify all lead hazards by performing a lead-based paint risk assessment. RRP Certified Contractors must control the hazards using interim controls and clearance of the worksite is performed at the end of the job to ensure that no lead dust hazards remain in the work area.

$25,001.00 or more: Identify and abate lead hazards. Identify all lead hazards at the property by performing a risk assessment and then abate all the hazards. This approach requires certified abatement contractors perform the abatement part of the job and clearance of the worksite is performed at the end of the job to ensure that no lead dust hazards remain in the work area.

This policy is not applicable to homes that were built in 1978 or after.

The City is also administering a new lead based paint hazard reduction program with newly awarded grant funds from HUD's Office of Lead Hazard Control and Healthy Homes. This new program will eliminate lead based paint hazards in 58 homes over a three year period targeting low-income residents with children under six years of age at risk for lead poisoning.

Actions planned to reduce the number of poverty-level families

Programs funded with CDBG and HOME provide homeowner rehabilitation and repairs, production of new rental and homeowner units and down payment assistance for income-eligible homebuyers. These activities, that produce and preserve affordable housing, are important in reducing the number of poverty-level families in the city. Using CDBG funding, city programs also support activities that provide public services and recreational activities.

Housing Choice Voucher (HCV) agencies in Kenton and Campbell Counties administer Family Self-Sufficiency Programs and Section 8 to Homeownership Programs to guide HCV families on a path of financial stability.

The city implements the federally required Section 3 program, where applicable, to ensure that employment or contracting opportunities generated by HUD funded projects give preference to qualified low- and very-low income persons or business concerns.

Actions planned to develop institutional structure

CDBG and HOME funds are administered through the Neighborhood Services Department. The Department oversees the management and expenditure of these funds with assistance from the City's Finance Department. Functions of the department include planning and policy-making, program administration, management of grants/loans and monitoring. The department also manages the

implementation of all activities funded by the CDBG and HOME Programs.

The City of Covington is a HOME participation jurisdiction and is the lead entity of the Northern Kentucky HOME Consortium. The Consortium includes Covington and the cities of Ludlow, Newport, Bellevue and Dayton. There is a Governing Board with one representative from each municipality serving as a voting member. This representative is the Mayor or his/her designee. This Board establishes all policies and procedures, determines funding allocations, controls all activities and will instruct Covington during implementation of the program in accordance with the Bylaws. Covington, as the lead entity, ultimately approves all funding decisions.

There is also an extensive structure of other agencies, non-profit and for-profit developers, educational institutions, neighborhood and community organizations, non-profit funders, affordable housing developers, business, economic development and workforce development organizations, lenders, private funders and healthcare providers that work towards implementing the goals of the Consolidated Plan.

City staff monitors all HOME and CDBG programs and activities internally and externally to ensure program effectiveness and efficiency. All individual activity files are monitored by the Federal Grants Manager to ensure compliance with all program rules and regulations. This includes homeowner rehab programs, homebuyer programs, recreation programs, public facilities and improvements, business assistance programs, crime prevention efforts, code enforcement and any other activities funded in whole or in part with HOME or CDBG. An onsite monitoring schedule will be created for all external monitoring requirements such as CHDO annual monitoring and past projects funded with CDBG or HOME that require ongoing monitoring. External monitoring will be conducted by the Federal Grants Manager and/or the CDBG-HOME Program Coordinator. No CDBG or HOME funds are committed for any project or activity without prior review by the Federal Grants Manager.

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

There are a number of ongoing collaborative efforts in the community. The City maintains communications and a cooperative relationship with the following community based organizations: Northern KY Health Department, Covington Neighborhood Collaborative, Center for Great Neighborhoods of Covington, Housing Opportunities of Northern Kentucky, Entryway, Inc., the United Way, the Catalytic Development Fund of Northern Kentucky, the Life Learning Center, Catholic Charities of Northern Kentucky, The Brighton Center, The Welcome House, the Covington Human Rights Commission, real estate professionals and lenders.

The City utilizes these agencies to promote city assistance programs. The City will enter into MOU's with many of these agencies to promote the new Lead Based Paint Hazard Control Program and to refer

families for assistance.

The City will continue to foster and expand these cooperative efforts to further the goals of the Consolidated Plan.

Discussion:

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(l)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	3,644
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	**3,644**

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	90.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

   Covington/NKY HOME Consortium will only utilize HOME entitlement funds for eligible activities within 92.205. Other forms of investments are private lender mortgage funds/construction loans and homebuyer contributions. The Consortium leverages its HOME funds with other forms of

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investment including private interest-bearing debt for housing development, Federal Home Loan Bank funds, and other private grant funds. Homeowners assisted by the HOME program use private interest-bearing debt to purchase homes and contribute their own funds towards purchases.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

   The City of Covington provides HOME Program funds to create affordable housing units and assist income eligible families with the purchase of a home. The following Recapture Policy ensures that the city recoups all or a portion of the HOME assistance paid to the homebuyers in the event that the assisted housing does not continue to be the principal residence of the family through the duration of the affordability period. The HOME investment that is subject to recapture is based on the amount of HOME assistance that enabled the homebuyer to purchase the dwelling unit. This includes any HOME assistance that reduced the purchase price from the fair market value to an affordable price, but excludes the amount between the cost of producing the unit and the market value of the property (the development subsidy). Covington does not use the re-sale provision for HOME homebuyer projects.

   The following minimum affordable periods will be imposed on all HOME funded homebuyer activities based on the level of funding provided:

- Under $15,000 – 5 years
- $15,000-$40,000 – 10 years
- Over $40,000 – 15 years

   To ensure recapture, the City will execute a HOME program agreement, a promissory note and a mortgage. The borrower agrees to remain in the property as the principal place of residence for a period of no less than the minimum required period of affordability from the date of the execution of the agreements. If the property is sold or the borrower does not reside in the premises for the required minimum period of affordability, the outstanding principal balance shall immediately become due and payable (recapture provision) as outlined in the HOME program agreement and the Promissory Note.

   The HOME mortgage is recorded on the property for the term of the agreement. HOME funds are provided to homebuyers in the form of interest-free, deferred-forgivable loans. The loan balance is repaid in a lump sum upon the sale, transfer or vacating of the property.

   When the recapture provision is triggered by a sale (voluntary or involuntary) of the housing unit, and there are no net proceeds or the net proceeds are insufficient to repay the HOME investment due, the City will only recapture the net proceeds, if any. “Net proceeds” is defined as the sales

price minus superior loan repayment (other than HOME funds) and any closing costs.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

   See above description.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

   Not applicable.

Appendix - Alternate/Local Data Sources

1	**Data Source Name** Section 8 data
	List the name of the organization or individual who originated the data set. The Kenton County, Kentucky Section 8 Program
	Provide a brief summary of the data set.
	What was the purpose for developing this data set? The Section 8 Program keeps these records as part of their Program requirements.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? The data is from the Section 8 Program participants.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? This is a snapshot from July, 2020.
	What is the status of the data set (complete, in progress, or planned)? The status of the data is it is ongoing.
2	**Data Source Name** 2020 Commonwealth of Kentucky Point in Time Count
	List the name of the organization or individual who originated the data set. Many homeless agencies take part in this survey every year. It is coordinated in Northern Kentucky by the Northern Kentucky Area Development District (NKADD).
	Provide a brief summary of the data set. Homeless Point in time Counts
	What was the purpose for developing this data set? To gain as accurate assessment as possible of the homeless population.
	Provide the year (and optionally month, or month and day) for when the data was collected. January 2020
	Briefly describe the methodology for the data collection. Physical counts
	Describe the total population from which the sample was taken. Homeless

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	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. Homeless

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