



## City of Covington, KY and the NKY HOME Consortium

### PY 2025-2026 Consolidated and Annual Action Plan Summary

This summary is being published for review along with the draft PY 2025-2026 Consolidated/Annual Action Plan. The purpose of this summary is to give interested residents and other stakeholders an overview of what is included in the draft Consolidated/Annual Action Plan. These documents are available for public review and comment for thirty (30) days prior to the Plan being submitted to HUD for review.

Comments and input regarding the draft Consolidated/Annual Action Plan can be sent to the City of Covington's Federal Grants Manager using the contact info below:

- Jeremy Wallace, Federal Grants Manager, 20 west Pike Street, Covington, KY 41011; 859-292-2147 or [jwallace@covingtonky.gov](mailto:jwallace@covingtonky.gov)

Input and/or comments can be submitted in writing to the physical address or email address above or by contacting the Federal Grants Manager by phone.

The Consolidated/Annual Action Plan includes funding from the federal CDBG and HOME programs and covers the period of July 1, 2025, to June 30, 2030. The Plan includes funding from three sources: formula-based entitlements, program income/recaptured funds and prior year carryover funding.

The amount of funding expected for PY 2025 is \$2,701,710 for CDBG and \$3,029,963 for HOME. CDBG can be utilized for a multitude of housing and community development projects. HOME is dedicated for affordable housing activities.

The Plan includes 10 goals to be supported with these funds for PY 2025. These goals are: Expand Homeownership Opportunities; Increase Affordable Housing 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.

To support these annual goals, the City creates programs and projects to utilize CDBG and HOME funding. For PY 2025, these include: Homebuyer Assistance Programs; CHDO and other Affordable Housing Development; Homeowner Repair Programs; Code Enforcement; Early Literacy Programs; Keep Covington Beautiful Initiative; and Anti-Crime/Community Policing programs.

CDBG funds will be utilized only in the City of Covington. The City is the lead entity in the NKY HOME Consortium. This is a regional partnership between Covington, Ludlow, Newport, Bellevue, Dayton, Erlanger, Florence, and Independence. HOME funds will be utilized to create affordable housing in all these communities.

The Consolidated/Annual Action Plan also includes information on geographic distribution of funds, public housing initiatives, homeless and other special needs activities, and barriers to affordable housing. The Plan will be available for review and public comment from June 9, 2025, to July 10, 2025.

## Executive Summary

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

#### 1. Introduction

The 2025-2030 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, 2025, to June 30, 2030, and the Annual Action Plan for Program Year July 1, 2025, to June 30, 2026.

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, Dayton, Erlanger, Florence, and Independence. 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 2025-2030 Consolidated Plan provides a framework to identify and prioritize housing and community development needs and establish goals to address these needs.

## Demo

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 nine goals: Expand Homeownership Opportunities; Increase Affordable Housing 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 mostly 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

## Demo

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 a local paper at least fourteen (14) days prior to the hearing. The City also placed posters in English and Spanish in community 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 and at the Hellmann Creative Center, a centrally located, accessible community center.

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 30-day comment period was given to persons, groups, or agencies who wished to comment. The published summary also provided an address, contact person and phone number where comments could be directed. Citizens were also provided an opportunity to review the entire proposed Consolidated Plan/Annual Action Plan, with the summary and public notice attached, which were available for review at the City of Covington, and on the City of Covington's website. During the 30-day period, a 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 City of Covington Neighborhood Services Department 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.

## 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
ESG Administrator		
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, Independence, Erlanger, Florence, 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(I) and 91.315(I)**

### **1. Introduction**

The City of Covington sought input from 14 local organizations, groups, and agencies in developing its 2025-2030 Consolidated Plan. This included a variety of nonprofit service providers, city and county agencies, regional organizations, 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(I)).**

The City of Covington works closely with public and assisted housing providers to provide safe, affordable housing. The Kenton County Housing Choice Voucher Program recently merged with the Covington Housing Authority. This merger allows both agencies to offer a one-stop shop location and increases efficiencies. The City provides support and technical assistance to agencies that provide mental health and homelessness services.

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, Erlanger, Independence, Florence, Newport, Bellevue and Dayton created to increase affordable housing opportunities in the region. We added three new cities in the last Consolidated plan period which increases our ability to provide affordable housing, Federal assistance, and coordination in those cities.

- 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. Have a certification process in Covington for homeless shelters to maintain quality services and enhance cooperation.

- 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.

## Demo

- Participate in the OKI Regional Council of Governments planning efforts.
- Participate in regional planning efforts of OneNKY (formerly Vison 2015 and The Alliance) to promote local economic development initiatives. OneNKY is building a new headquarters inside Covington to be a center for regional efforts to revitalize Northern Kentucky and the urban core.
- 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. 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.

Many local social service organizations were consulted to develop the HOME-ARP Plan submitted to HUD for these homeless stimulus funds. Through consultation with local service providers, the City identified housing and supportive services as two needs for the HOME Consortium cities. The City will be working closely with homeless service providers to administer HOME-ARP funds for supportive service during the ConPlan period. HOME-ARP funds will also be used to develop housing inside Covington to benefit identified qualifying populations.

**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	<b>Agency/Group/Organization</b>	Northern Kentucky Community Action Commission
	<b>Agency/Group/Organization Type</b>	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
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	NKY Community Action Commission was consulted regarding affordable housing needs, homelessness issues, special needs populations, and economic development.
2	<b>Agency/Group/Organization</b>	CENTER FOR INDEPENDENT LIVING OPTIONS
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities Services-Persons with HIV/AIDS Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Non-Homeless Special Needs

Demo

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	CILO was consulted regarding affordable housing needs, homelessness issues, special needs populations and special housing needs.
3	<b>Agency/Group/Organization</b>	ENTRYWAY, INC.
	<b>Agency/Group/Organization Type</b>	Housing PHA Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Neighborhood Foundations/Entryway Inc. was consulted regarding affordable housing needs, housing barriers, public housing needs, and market analysis.
4	<b>Agency/Group/Organization</b>	HOUSING AUTHORITY OF COVINGTON
	<b>Agency/Group/Organization Type</b>	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 Services - Narrowing the Digital Divide
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Housing Authority of Covington was consulted regarding affordable housing needs, public housing needs, public housing conditions, expanding broadband and internet, special needs populations, and market analysis.

Demo

5	<b>Agency/Group/Organization</b>	WELCOME HOUSE OF NORTHERN KENTUCKY
	<b>Agency/Group/Organization Type</b>	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
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Welcome House of Northern KY was consulted regarding affordable housing needs, homelessness needs and services, homelessness strategies, anti-poverty strategies and market analysis.
6	<b>Agency/Group/Organization</b>	Covington Independent School District
	<b>Agency/Group/Organization Type</b>	Housing Services-Children Services-Health Services-Education Child Welfare Agency Major Employer

Demo

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Covington Independent School District was consulted regarding child welfare, child health issues, housing affordability needs, homelessness issues and special needs populations.
7	<b>Agency/Group/Organization</b>	Northern Kentucky Health Department
	<b>Agency/Group/Organization Type</b>	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
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The NKY Health Dept. was consulted regarding mental health issues, homelessness issues, emergency management, other public health issues and lead based paint strategies.

8	<b>Agency/Group/Organization</b>	BRIGHTON CENTER, INC.
	<b>Agency/Group/Organization Type</b>	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
	<b>What section of the Plan was addressed by Consultation?</b>	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
<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Brighton Center was consulted regarding affordable housing needs, housing barriers, homelessness needs and services, special needs populations, anti-poverty strategies and economic development.	

Demo

9	<b>Agency/Group/Organization</b>	EMERGENCY SHELTER OF NORTHERN KENTUCKY
	<b>Agency/Group/Organization Type</b>	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
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Emergency Shelter of Northern KY was consulted regarding affordable housing needs, housing barriers, homelessness needs and services, and anti-poverty strategy.
10	<b>Agency/Group/Organization</b>	Kenton County Housing Choice Voucher Program
	<b>Agency/Group/Organization Type</b>	Housing PHA Service-Fair Housing Other government - Local Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Market Analysis Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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.

Demo

11	<b>Agency/Group/Organization</b>	CENTER FOR GREAT NEIGHBORHOODS
	<b>Agency/Group/Organization Type</b>	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
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Center for Great Neighborhoods of Covington was consulted regarding affordable housing needs, housing barriers and market analysis.
12	<b>Agency/Group/Organization</b>	WOMEN'S CRISIS CENTER
	<b>Agency/Group/Organization Type</b>	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
	<b>What section of the Plan was addressed by Consultation?</b>	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

Demo

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

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Housing Opportunities of Northern KY (HONK) was consulted regarding affordable housing needs, market analysis and lead based paint strategies.
16	<b>Agency/Group/Organization</b>	TRANSITIONS, INC.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Transitions, Inc. was consulted regarding affordable housing needs, homelessness issues, and services.
17	<b>Agency/Group/Organization</b>	Cincinnati Bell
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Cincinnati Bell was consulted regarding economic development needs and broadband/internet needs. The City worked with Cincinnati Bell and Housing Authority of Covington to expand public WIFI to low-income neighborhoods and for public housing complexes.

Demo

18	<b>Agency/Group/Organization</b>	Sanitation District #1
	<b>Agency/Group/Organization Type</b>	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - County Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Storm Water Management
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	SD1 was consulted regarding storm water management issues and pump stations. The City constantly works with SD1 on flooding and water management.
19	<b>Agency/Group/Organization</b>	US Army Corps of Engineers
	<b>Agency/Group/Organization Type</b>	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Other government - Federal
	<b>What section of the Plan was addressed by Consultation?</b>	Flood Prone Areas/Public Lands
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The US Army Corps of Engineers was consulted regarding management of flood prone areas. The City has an extensive flood wall and levee system. There is a levee area that is experiencing a slide/failure. The City works with the Corps of Engineers to address these repairs.

**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	Northern Kentucky Community Action Commission	Provide housing, coordinate with homeless agencies
NKY Housing Study	Northern Kentucky Area Development District	Addressing housing shortage regionally

**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, Erlanger, Independence, Florence, 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 of Covington 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.

**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 10 people.	Please see attached documents outlining citizen participation comments and responses.	All comments received during plan development were accepted and taken into consideration in developing the final Plan.	

Demo

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 75 responses to the community needs survey.	Please see attached documents outlining citizen participation comments and responses.	All comments received during plan development were accepted and taken into consideration in developing the final Plan.	

Table 4 – Citizen Participation Outreach

## **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 4,280 households that are at or below 30% AMI and 6,990 households that are at or below 50% AMI. A total of 272 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: 2020	% Change
Population	40,845	40,465	-1%
Households	16,745	17,395	4%
Median Income	\$35,664.00	\$46,035.00	29%

**Table 5 - Housing Needs Assessment Demographics**

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

### Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	4,280	2,710	3,500	2,020	4,890
Small Family Households	1,235	730	1,295	665	2,575
Large Family Households	205	75	100	130	300
Household contains at least one person 62-74 years of age	1,015	680	770	255	870
Household contains at least one person age 75 or older	480	385	260	60	190
Households with one or more children 6 years old or younger	744	330	525	269	445

**Table 6 - Total Households Table**

Data Source: 2016-2020 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
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	125	35	35	4	199	29	4	25	15	73
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	75	100	15	0	190	15	0	0	10	25
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	90	0	4	0	94	0	0	0	15	15
Housing cost burden greater than 50% of income (and none of the above problems)	1,440	65	10	0	1,515	440	165	4	0	609

Demo

	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)	395	780	275	15	1,465	250	235	275	30	790
Zero/negative Income (and none of the above problems)	290	0	0	0	290	55	0	0	0	55

**Table 7 – Housing Problems Table**

Data 2016-2020 CHAS  
Source:

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
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	1,730	200	65	4	1,999	484	170	30	45	729
Having none of four housing problems	1,490	1,620	1,800	795	5,705	575	720	1,610	1,175	4,080
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

**Table 8 – Housing Problems 2**

Data 2016-2020 CHAS  
Source:

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	580	200	40	820	144	85	25	254
Large Related	115	35	4	154	0	0	0	0
Elderly	560	270	4	834	320	199	110	629
Other	810	445	235	1,490	260	120	144	524
Total need by income	2,065	950	283	3,298	724	404	279	1,407

Table 9 – Cost Burden > 30%

Data 2016-2020 CHAS  
Source:

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	0	0	20	20	69	55	0	124
Large Related	0	0	0	0	0	0	0	0
Elderly	365	25	0	390	170	54	0	224
Other	0	675	30	705	225	0	0	225
Total need by income	365	700	50	1,115	464	109	0	573

Table 10 – Cost Burden > 50%

Data 2016-2020 CHAS  
Source:

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	125	90	15	0	230	15	0	0	14	29

Demo

	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	25	4	0	0	29	0	0	0	10	10
Other, non-family households	15	0	4	0	19	0	0	0	0	0
Total need by income	165	94	19	0	278	15	0	0	24	39

Table 11 – Crowding Information – 1/2

Data Source: 2016-2020 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 many older, single homeowners that are mostly Extremely Low Income. 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.**

According to the Kentucky Domestic Violence Data Report, in 2023, 140 individuals were served in shelter in the Northern Kentucky Area Development District area of 8 counties, who were victims of domestic violence, dating violence, sexual assault and stalking. There were 136 unmet requests for shelter in that time period. “Unmet Requests for Shelter” are the number of unmet requests for shelter due to program shelter, safe homes, or sponsored hotel rooms being at capacity or unavailable. The count includes adult victims of domestic violence only and does not include individuals who were not served because their needs were inappropriate for the services of the program (e.g., homelessness not related to domestic violence). The count does include the total number of times requests for shelter were declined, even if the program provided other services to the requestor.

It is estimated that approximately 13% of the population under 65 years of age in 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 substandard. The City has aggressively tried to crack down on slum landlords, yet there are still too many substandard units. There 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 or affordable 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 impacts 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 number of affordable units, especially for low-income families has decreased. Families and individuals at risk of becoming unsheltered need childcare, affordable transportation options, mental health services, substance abuse programs, case management services, workforce development services, and educational/training programs.

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

**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, etc.), absentee landlords, underemployment, lack of a livable wage, accessible employment with reliable, affordable transportation led to increased risk of homelessness. Also, mental health, substance abuse and family issues add to the risk.

### **Discussion**

### 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	2,860	1,415	0
White	1,985	845	0
Black / African American	495	520	0
Asian	14	15	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	190	24	0

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data 2016-2020 CHAS  
Source:

\*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	1,385	1,320	0
White	970	1,025	0
Black / African American	145	195	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0

Demo

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	245	90	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data 2016-2020 CHAS  
Source:

\*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	640	2,860	0
White	605	2,285	0
Black / African American	29	445	0
Asian	0	20	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	4	65	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data 2016-2020 CHAS  
Source:

\*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	95	1,925	0
White	75	1,635	0
Black / African American	20	160	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	19	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	0	95	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data 2016-2020 CHAS  
 Source:

\*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 disproportionately affected by these housing problems.

Many of Covington’s very low households (67 percent) report experiencing at least one housing problem. Very low income American Indian, Alaska Native (100 percent) and Hispanic (89 percent) households have a disproportionate housing need with one or more identified housing problems.

Over half (51 percent) of low-income households in Covington experience at least one housing problem. Low-income Hispanic (73 percent) households have a disproportionate housing need with one or more identified housing problems.

**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**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	2,214	2,065	0
White	1,524	1,310	0
Black / African American	395	620	0
Asian	14	15	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	120	100	0

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data 2016-2020 CHAS  
Source:

\*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**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	370	2,340	0
White	250	1,740	0
Black / African American	20	320	0
Asian	0	0	0

Demo

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	100	240	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data 2016-2020 CHAS  
Source:

\*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**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	95	3,410	0
White	80	2,810	0
Black / African American	4	470	0
Asian	0	20	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	4	65	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data 2016-2020 CHAS  
Source:

\*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**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	49	1,970	0
White	39	1,670	0
Black / African American	10	170	0
Asian	0	19	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	0	0
Hispanic	0	95	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data 2016-2020 CHAS  
Source:

\*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 disproportionately affected by these housing problems.

The share of very low-income households in Covington experiencing at least one severe housing problem is 52 percent. More than 2,200 households in the city experience at least one severe housing problem at this income level. Data indicates that very low income American Indian, Alaska Native (100%) households have a disproportionate greater severe housing need with one or more of the housing problems identified above.

14 percent of low-income Covington households experience at least one severe housing problem. More than 350 households have at least one severe housing problem at this income level. Low-income Hispanic households have a disproportionate housing need with one or more severe housing problems (29 percent).

## 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.

According to HUD, disproportionate need refers to any need for a certain race/ethnicity that is more than ten percentage points above the need demonstrated for the total households within the jurisdiction at a particular income level. The table below indicates the share of households by race/ethnicity experiencing cost burden (paying between 30-50 percent of household income for housing costs) and severe cost burden (paying more than 50 percent of household income for housing costs). Disproportionate need for each race/ethnicity is determined by calculating the share of the total number of cost-burdened and severely cost-burdened households from each race/ethnicity and comparing that figure to the share of all Covington households. (Share of Race/Ethnicity = “# of households for that race/ethnicity with cost burden/total # of households for that race/ethnicity.”)

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	12,200	2,495	2,300	395
White	10,245	1,835	1,695	200
Black / African American	1,324	260	390	144
Asian	160	0	14	15
American Indian, Alaska Native	35	0	4	0
Pacific Islander	0	0	0	0
Hispanic	335	355	40	30

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2016-2020 CHAS

### Discussion:

Very low and low-income households, those at or below 50% of the area median income, are disproportionately affected by these housing problems.

## Demo

In Covington, roughly 70 percent of all households spend 30 percent or less of their income on housing. Fourteen percent are considered “cost-burdened” (30-50 percent income spent on housing costs), and 13 percent of households are “severely cost-burdened” (more than 50 percent of income spent on housing costs). The share of income to housing costs for each race/ethnicity follows. As a group, Hispanic households are, as defined by HUD, disproportionately affected by housing costs exceeding 30% of their household income.

### **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.

Very low income American Indian, Alaska Native (100 percent) and Hispanic (89 percent) households have a disproportionate housing need with one or more identified housing problems.

Low-income Hispanic (73 percent) households have a disproportionate housing need with one or more identified housing problems.

#### **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. Census Tract 609, part of the Austinburg neighborhood, has the highest concentration of Hispanic households in the City.

## NA-35 Public Housing – 91.205(b)

### Introduction

The Housing Choice Voucher Program (Section 8) was administered by the City of Covington since its inception until 2025. The jurisdiction for the program is Kenton County, KY. The Housing Choice Voucher Department (HCV) had been a part of a Consortium with the Housing Authority of Covington. The decision was made in the last Program Year to merge the HCV Department with the Housing Authority of Covington to help defray costs, eliminate any confusion for where to find public housing for Covington residents, and combine all public housing officially and administratively under one roof. 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 623 physical units located in two family sites - Latonia Terrace 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			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	755	0	0	0	0	0	0

**Table 22 - Public Housing by Program Type**

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

Data Source: PIC (PIH Information Center)

**Characteristics of Residents**

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	7,520	0	0	0	0	0
Average length of stay	0	0	5	0	0	0	0	0
Average Household size	0	0	2	0	0	0	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	110	0	0	0	0	0
# of Disabled Families	0	0	148	0	0	0	0	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**

**Data Source:** PIC (PIH Information Center)

**Race of Residents**

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	378	0	0	0	0	0	0
Black/African American	0	0	377	0	0	0	0	0	0
Asian	0	0	0	0	0	0	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	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**

Data Source: PIC (PIH Information Center)

**Ethnicity of Residents**

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

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

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

Demo

**Data Source:** PIC (PIH Information Center)

**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.

**Discussion**

## NA-40 Homeless Needs Assessment – 91.205(c)

### Introduction:

The data below is pulled from the 2024 K-Count, also referred to as the Point-in-Time Count. It represents a snapshot of homelessness statistics for Kenton County 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)	44	178	222	0	0	0
Persons in Households with Only Children	0	0	0	0	0	0
Persons in Households with Only Adults	0	0	0	0	0	0
Chronically Homeless Individuals	0	0	0	0	0	0
Chronically Homeless Families	0	0	0	0	0	0
Veterans	0	0	0	0	0	0
Unaccompanied Child	0	0	0	0	0	0
Persons with HIV	0	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments:

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	0	0
Black or African American	0	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	0	0
Not Hispanic	0	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.**

This data was not collected in 2024 in the annual K-Count conducted by the Kentucky Housing Corporation and local homeless agencies.

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

This data was not collected in 2024 in the annual K-Count conducted by the Kentucky Housing Corporation and local homeless agencies.

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

According to the 2024 K-Count there are approximately 44 homeless individual unsheltered on a given night and approximately 178 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 generally 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 (released January 31, 2025), as of December 31, 2023, there are 214 people with HIV in Campbell County, 190 people in Boone County, and 580 people in Kenton County with HIV.

**If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))**

There are no plans to create or administer a TBRA Program.

## **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.

### **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. The City is working its way through the list by gathering public input and assessing available funds to maximize value.

### **Describe the jurisdiction’s need for Public Improvements:**

The City is full 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 ongoing infrastructure needs that currently exist including: streetscapes, sidewalk improvements, and curb cuts and ramps.

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, demolition, and incentives to spur private developers to purchase and rehabilitate properties. These efforts will be increased in the coming years.

The City has a large inventory of vacant and abandoned properties — parcels that once fell into city hands through anti-blight enforcement but now represent opportunity. Many of these lots are currently tax delinquent and cost the city money in maintenance and public works response. City staff will identify the top 10 city-owned vacant properties with the highest market potential. The goal: sell those lots for maximum value and reinvest the proceeds directly into the city’s housing development program — giving private and nonprofit developers the ability to acquire and rehabilitate homes and lots for families and individuals earning median income.

### **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:

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.

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

### Introduction

Data from the 2016-2020 ACS indicates that there are 19,865 residential units in the City, 53% of which are single unit detached structures and 19% 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	10,605	53%
1-unit, attached structure	1,155	6%
2-4 units	3,795	19%
5-19 units	2,485	13%
20 or more units	1,650	8%
Mobile Home, boat, RV, van, etc	175	1%
<b>Total</b>	<b>19,865</b>	<b>100%</b>

**Table 27 – Residential Properties by Unit Number**

Data Source: 2016-2020 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	10	0%	575	7%
1 bedroom	595	7%	3,425	39%
2 bedrooms	2,620	30%	3,105	35%
3 or more bedrooms	5,415	63%	1,660	19%
<b>Total</b>	<b>8,640</b>	<b>100%</b>	<b>8,765</b>	<b>100%</b>

**Table 28 – Unit Size by Tenure**

Data Source: 2016-2020 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 50 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.

The Housing Authority of Covington 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 1,265 Housing Choice Vouchers, 133 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 did remove a public housing complex in the last few years. This complex was deemed to be past its useful life and the cost of modernization and rehabilitation was problematic. Since these units were eliminated, they should be replaced by Section 8 Housing Choice Vouchers so that the amount of affordable housing availability will hopefully remain close to the original amount.

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

There is a shortage of affordable rental and owner-occupied 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. A 2023 Northern Kentucky Area Development District study that found the region will need 6,650 new housing units by 2028. Covington alone needs 891.

**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. The City hopes to utilize some HOME-ARP funds to keep people in their housing, preventing them from becoming homeless.

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

### Introduction

The housing market in the City of Covington is in very high demand. This has caused median home sales prices and median rent costs to increase substantially, by 23% and 12% respectively, 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: 2020	% Change
Median Home Value	97,700	120,100	23%
Median Contract Rent	538	602	12%

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	3,085	35.2%
\$500-999	4,910	56.0%
\$1,000-1,499	640	7.3%
\$1,500-1,999	55	0.6%
\$2,000 or more	70	0.8%
<b>Total</b>	<b>8,760</b>	<b>99.9%</b>

Table 30 - Rent Paid

Data Source: 2016-2020 ACS

### Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	1,535	No Data
50% HAMFI	4,530	1,660
80% HAMFI	6,855	3,499
100% HAMFI	No Data	4,799
<b>Total</b>	<b>12,920</b>	<b>9,958</b>

Table 31 – Housing Affordability

Data Source: 2016-2020 CHAS

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	883	993	1,287	1,707	1,885
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 prices and median rent costs continue to rise which is adding to the affordable housing shortage. Interest rates have risen over historic lows, causing homeowners to not sell as quickly as prior years, decreasing the normal amount of homes on the market. With less homes for sale, the prices have stayed high, thereby increasing and sustaining unaffordability.

### 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. Of the City's housing stock, 74% was built before 1980. And 74% of owner-occupants and 85% of renters live in units built before 1980. A total of 5% of all owner-occupied units and 4% of renter-occupied units built before 1980 include children aged six or younger.

### Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

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	1,575	18%	3,140	36%
With two selected Conditions	10	0%	345	4%
With three selected Conditions	24	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	7,015	81%	5,280	60%
<b>Total</b>	<b>8,624</b>	<b>99%</b>	<b>8,765</b>	<b>100%</b>

Table 33 - Condition of Units

Data Source: 2016-2020 ACS

### Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	730	8%	430	5%
1980-1999	1,540	18%	845	10%
1950-1979	1,515	18%	3,190	36%
Before 1950	4,840	56%	4,310	49%
<b>Total</b>	<b>8,625</b>	<b>100%</b>	<b>8,775</b>	<b>100%</b>

Table 34 – Year Unit Built

Data Source: 2016-2020 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	6,355	74%	7,500	85%
Housing Units build before 1980 with children present	459	5%	364	4%

**Table 35 – Risk of Lead-Based Paint**

Data Source: 2016-2020 ACS (Total Units) 2016-2020 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

18% of owner-occupied housing and 36% 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 823 units that are occupied by families with children six years of age or under that may contain lead-based paint hazards. That is the maximum possible number of units built before 1980 and with children present using the ACS Census Data.

Since 60% of all households are Low-Moderate Income, then it could be extrapolated that of the 13,855 units that contain lead-based paint standards based on year built, 8,313 of them could contain lead-based paint hazards if the income distribution holds for all housing types by year built.

## 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			854						
# 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**

Data Source: PIC (PIH Information Center)

### 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 854 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.

**Public Housing Condition**

Public Housing Development	Average Inspection Score

**Table 38 - Public Housing Condition**

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

Disposition: HAC is working on a disposition application for one non-tenant, commercial property- 1016 Greenup St., Covington, KY 41011. The property was formerly used for office space for resident support services. However, it has primarily stood vacant for much of the last 5+ years. The property was acquired for \$1.00 from the City of Covington in the 1990's. Once approved for disposition, we intend to sell the property as is, with the sales proceeds going toward modernization of our properties.

Conversion of Public Housing to Project Based Vouchers under RAD: On 1/1/2022, HAC transferred property management responsibilities for three developments to Neighborhood Investment Partners (NIP). The three developments included: Emery Drive (69), Eastside Revitalization II (33) and Eastside Revitalization III (31). Of these 133 units, 26 are public housing. HAC applied for RAD conversion in the fall 2024. We were notified by HUD on 12/30/24 that all three applications for RAD conversion were approved. We will continue to work toward completing the RAD conversion process of these properties. Additional RAD conversions are also under consideration for other public housing and mixed finance properties in our portfolio, particularly for New Site Properties and Eastside Revitalization 1.

Units with Approved Vacancies for Modernization: Latonia Terrace, our largest general occupancy development, was built in 1939. The property needs extensive modernization, of windows, stacks, kitchens and baths. We intend to do a phased modernization plan, of windows, then unit renovations. This will require buildings/units to be taken off-line for modernization and may impact families to be temporarily displaced. Documentation to take units temporarily off-line in PIC for modernization will be submitted to HUD in 2025.

Other Capital Grant Programs: HAC intends to apply for an Emergency Safety and Security Grant (ESSG) to include emergency conditions caused by NSPIRE deficiencies.

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

Goal I: Strengthen the housing portfolio by disposition of obsolete assets, modernization of high demand assets, and consolidation of the public housing and housing choice voucher programs.

--HAC will soon be in a position to sell City Heights, which was approved for disposition by HUD 9/30/21. Sales proceeds will be used to fund modernization of our other PHA properties, particularly Latonia Terrace which was completed in 1939. As such, it is likely PHAI will need to request that units at Latonia

Terrace, and potentially other sites, be taken off-line for extensive modernization in the years ahead. We project that plans will call for a systematic approach to modernization so only a manageable number of buildings/units are taken off-line at the same time modernization.

--HAC and HCV have consolidated. The goal with consolidation is to merge the two PHAs for greater operating efficiencies, better customer service, financial sustainability, and increased opportunities to expand and maintain decent, safe, and affordable housing.

--HAC transferred management responsibilities for Emery Drive (69 units, 12 public housing and 57 market rate) to Neighborhood Investment Partners (NIP) in 2021. PHA subsequently transferred management responsibilities for Eastside Revitalization II (33 units, of which 8 are public housing and 25 are PBV units) and Eastside Revitalization III (31 units, of which 6 are public housing and 25 are PBV units) to NIP on 1/1/2022. ESRII and ESRIII are tax credit properties. As agency funding and staffing capacity diminish with the disposition of City Heights, we are finding it necessary to reduce the size of our portfolio and simplify agency operations.

--PHA I is working on a disposition application for one non-tenant, commercial property- 1016 Greenup St., Covington, KY 41011. The property was formerly used for office space for resident support services. However, it has primarily stood vacant for much of the last 5+ years. The property was acquired for \$1.00 from the City of Covington in the 1990's. Once approved for disposition, we intend to sell the property as is, with the sales proceeds going toward modernization of our properties.

Goal 2: Expand affordable housing opportunities in the region. HAC will seek new partnerships that promote quality, affordable housing in the Northern Kentucky market. HAC may apply for a Choice Neighborhoods Planning Grant. HCV will continue to strive to expand the number of landlords participating in the HCV program.

Goal 3: Analyze HAC and HCV processes to maximize efficiency and effectiveness of operations. Work continues to fine-tune and enhance existing and new software programs. HAC and HCV implemented Skysite software in 2023 and 2024, respectively, to archive all tenant files. New tenant information and existing tenant updates will be archived electronically. Such a tool will help both PHAs save time and storage space.

Goal 4: Identify revenue and cost reduction strategies for improved fiscal performance. PHAI is looking to automate many operations in 2025, such as vendor payments, on-line rent payments, on-line applications and re-certifications, and on-line work orders.

Goal 5: Strive toward continuous improvement and achievement of high performer status in both PHAS and SEMAP annually. HAC senior staff participated in PHAS training in 2023. Succession and Staff Development Plans are in progress for senior staff. Many key positions will be retiring in the next 2-4 years.

\*This information is from the Housing Authority of Covington Consolidated Plan

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

### Introduction

The data in this section is from the HUD 2024 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)	0	0	0	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

**Table 39 - Facilities and Housing Targeted to Homeless Households**

Data Source Comments:

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

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 services 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. Aging 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.

**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.

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

There are programs and services available in the community to assist persons with special needs, i.e. elderly, mental or physical disabilities, and substance abuse issues. Local agencies including Welcome House, Life Learning Center, Transitions, Brighton Center, Northern KY Community Action Commission, and NorthKey offer housing and supportive services to these populations. The Center for Independent Living Options offer housing and supportive services to people with mental and physical disabilities. The Point/Arc provides education, residential and vocational opportunities to people with intellectual and developmental disabilities.

The City will continue to provide housing rehabilitation programs to address urgent home repair needs. These programs are prioritized to elderly, disabled and veteran households.

## **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, 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	30	1	0	0	0
Arts, Entertainment, Accommodations	3,025	2,500	18	17	-1
Construction	714	549	4	4	0
Education and Health Care Services	2,754	1,850	16	12	-4
Finance, Insurance, and Real Estate	1,432	3,686	8	24	16
Information	273	107	2	1	-1
Manufacturing	1,693	1,370	10	9	-1
Other Services	615	368	4	2	-2
Professional, Scientific, Management Services	1,933	2,641	11	17	6
Public Administration	0	0	0	0	0
Retail Trade	2,177	1,404	13	9	-4
Transportation and Warehousing	1,277	327	8	2	-6
Wholesale Trade	1,039	342	6	2	-4
Total	16,962	15,145	--	--	--

**Table 40 - Business Activity**

Data Source: 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	21,480
Civilian Employed Population 16 years and over	20,070
Unemployment Rate	6.51
Unemployment Rate for Ages 16-24	19.70
Unemployment Rate for Ages 25-65	4.69

**Table 41 - Labor Force**

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	5,360
Farming, fisheries and forestry occupations	750
Service	1,760
Sales and office	4,640
Construction, extraction, maintenance and repair	1,535
Production, transportation and material moving	1,335

**Table 42 – Occupations by Sector**

Data Source: 2016-2020 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	13,612	73%
30-59 Minutes	4,243	23%
60 or More Minutes	769	4%
<b>Total</b>	<b>18,624</b>	<b>100%</b>

**Table 43 - Travel Time**

Data Source: 2016-2020 ACS

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,320	180	1,660

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	4,395	299	2,190
Some college or Associate's degree	5,005	420	1,245
Bachelor's degree or higher	6,335	220	605

**Table 44 - Educational Attainment by Employment Status**

Data Source: 2016-2020 ACS

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	130	355	190	620	460
9th to 12th grade, no diploma	420	495	580	920	585
High school graduate, GED, or alternative	690	1,915	1,480	3,480	2,020
Some college, no degree	725	1,465	1,460	2,285	835
Associate's degree	75	350	370	735	270
Bachelor's degree	385	2,100	1,015	1,600	640
Graduate or professional degree	54	965	640	835	455

**Table 45 - Educational Attainment by Age**

Data Source: 2016-2020 ACS

### Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	0
High school graduate (includes equivalency)	0
Some college or Associate's degree	0
Bachelor's degree	0
Graduate or professional degree	0

**Table 46 – Median Earnings in the Past 12 Months**

Data Source Comments:

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

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

**Describe the workforce and infrastructure needs of the business community:**

The City has 3.9 times more workers in Transportation and Warehousing than available jobs for that sector in the City, and 3 times more workers in Wholesale Trade than available jobs for that sector in the City. Those jobs typically are located on large patches of land located outside the City. The City is limited in available land area for those types of jobs and new industries.

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, Erlanger and Boone County 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 purchased 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 development ready sites in the Midwest. The City is seeking, and working with, various small and large developers 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.

Covington needs to continue increasing technical associate and bachelor's degree educational attainment to better meet the current and future job demands.

**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 Action 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 has the Ignite Institute. This is a specialized high school that focuses on training students in the advanced manufacturing and science fields.

The Covington campus opened in 2024 and is home to several Enzweiler Building Institute programs. The Covington campus hosts high school students during the day for the Intro to Trades program. This campus is also the main campus for the Carpentry, Facilities Maintenance, HVAC, and Welding 13-Week afternoon programs. Additionally, it serves as a second location for eight of Enzweiler's evening programs: Carpentry, Covington Academy of Heritage Trades, Electrical, Facilities Maintenance, HVAC, Masonry, Plumbing, and Welding.

Partnerships like NKY Works, a comprehensive workforce development and talent strategy initiative led by the Northern Kentucky Area Development District, and the Northern Kentucky Chapter of the Kentucky Federation of Advanced Manufacturing Education (FAME) at Gateway Community & Technical College focus on filling gaps in workforce development and connecting middle and high school students to modern industry and non-traditional students and working adults to higher-wage jobs.

The Northern Kentucky Area Development District (NKADD) provides technical support to program staff in monitoring labor force trends and employer needs, as well as providing oversight of the Northern Kentucky Career Center in Covington.

Kentucky Career Center is the area's leading workforce development network, specializing in connecting employers with qualified workforce talent and job seekers with career opportunities. Kentucky Career Center – NKY and its operations in our eight-county region are funded by the Northern Kentucky Workforce Investment Board (NKWIB) through the Workforce Innovation Opportunity Act (WIOA).

While the NKY Workforce Investment Board (NKWIB) sets the regional policy and directs funding for regional workforce programming and initiatives, the NKWIB contracts with an independent entity to operate the Kentucky Career Center and provide direct workforce services for Adults, Dislocated Workers, and Youth.

For job readiness support, program enrollees may choose from among many local offerings, including: HAC's *GLASS (Get Learning and Start Succeeding)* program, the Northern Kentucky Career Center's *Job Seeker* programs, the Brighton Center's *Center for Employment Training (CET)*, and the Life Learning Center's holistic *Foundations* program.

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

No

**Discussion**

The City of Covington has a citywide economic development strategy that takes into account the dynamics of the Covington market.

The report 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 helps the City attract and retain businesses, create jobs and opportunities, and attract more talent to the area. It also serves as a guide to regional organizations in support of Covington.

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. The report contains a wealth of data and comparisons which are critical to the implementation 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")**

Areas of "minority concentration" are defined as census tracts that have more than double the percentage of minorities than the City as a whole. Covington has an 9.4% Black/African American population. Three census tracts have Black/African American concentrations: Census Tract 671 has 55.3%; Census Tract 651 has 38.6%; and Census Tract 610 has 24.3%. The City's Hispanic community has increased to 9.1% of the population. Three census tracts have Hispanic concentrations: Census Tract 650 has 20.7%; Census Tract 616 has 22.6%; and Census Tract 609 has 40.3%.

Areas of "low-moderate income concentration" are defined as census tracts that have 51% or more of households who are at or below 80% of area median income. The following census tracts have low-moderate income concentrations above 51%: 603, 607, 609, 610, 612, 613, 614, 616, 638, 650, 651, 670, and 671. Only 3 census tracts have no low-moderate income concentration: 611, 653 and 668. Low-moderate income concentration exists in most areas of the City.

### **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 recently. 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. Also, interest rates are much higher in the last few years thereby increasing monthly costs for potential homebuyers.

### **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 continues to prioritize 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, now known as CCR. 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. This site will bring economic opportunities, but also much needed tax revenue to provide services to all of Covington's 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.**

It is estimated that approximately 25% of households in the City do not have internet access in their homes. Most of Covington's residents reside in low- to moderate-income census tracts. Many low-income families cannot afford broadband internet service. This shortage of internet access creates a gap in student's access to education. This is especially crucial if virtual learning continues to be a necessity as a result of the COVID-19 lockdowns. The City is working with Cincinnati Bell, Renaissance Covington and the Housing Authority of Covington to provide public WIFI availability in low-income neighborhoods and in public housing complexes.

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

The City has an adequate number of internet service providers. Increased competition does not appear to be a need in this area.

## **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 wastewater 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.

When precipitation falls on hard surfaces like rooftops, streets and parking lots, it is unable to soak into the ground. Trees and other vegetation naturally soak up and slow the flow of storm water from rainfall and snow melt, but in their absence, the water "runs off" these hard surfaces, creating problems like flooding and erosion. As it flows over the land, storm water also picks up any trash, debris and pollutants in its path and carries them to nearby creeks and rivers, polluting the water the community uses for recreation and as a drinking water source. The City has worked with Sanitation District 1 to provide detention basins for stormwater runoff. The City recently took over management for stormwater in the City as well. The City continues to monitor the effectiveness of our management and adapts accordingly.

### **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

This section outlines the 5 Year Strategic Plan. This Strategic Plan was created after analyzing the needs assessment, market analysis and public input. It highlights the City's geographic priorities, priority needs, anticipated resources and goals.

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

### Geographic Area

Table 47 - Geographic Priority Areas

1	<b>Area Name:</b>	Citywide
	<b>Area Type:</b>	Local Target area
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Comprehensive
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	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.
	<b>Include specific housing and commercial characteristics of this target area.</b>	There are nineteen neighborhoods in Covington. Many have a mix of commercial and residential, with some having more commercial than residential, and vice versa. Areas with larger commercial areas are the downtown Central Business District, Latonia, Mainstrasse and Roebing area. Other areas are primarily residential.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	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.
<b>Identify the needs in this target area.</b>		
<b>What are the opportunities for improvement in this target area?</b>		
<b>Are there barriers to improvement in this target area?</b>		
2	<b>Area Name:</b>	HOME Consortium Cities
	<b>Area Type:</b>	Local Target area

<b>Other Target Area Description:</b>	
<b>HUD Approval Date:</b>	
<b>% of Low/ Mod:</b>	
<b>Revital Type:</b>	Housing
<b>Other Revital Description:</b>	
<b>Identify the neighborhood boundaries for this target area.</b>	The City of Covington is the lead entity of the Northern KY HOME Consortium. This Consortium includes the geographical boundaries of Covington, Ludlow, Erlanger, Independence, Florence, Newport, Bellevue and Dayton, KY. HOME projects and activities are available citywide to qualifying individuals and families in all cities in the Consortium.
<b>Include specific housing and commercial characteristics of this target area.</b>	
<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	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.
<b>Identify the needs in this target area.</b>	
<b>What are the opportunities for improvement in this target area?</b>	
<b>Are there barriers to improvement in this target area?</b>	

**General Allocation Priorities**

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

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 could be increased in those neighborhoods.

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

### Priority Needs

Table 48 – Priority Needs Summary

1	<b>Priority Need Name</b>	Affordable Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Elderly
	<b>Geographic Areas Affected</b>	Citywide HOME Consortium Cities
	<b>Associated Goals</b>	Expand Homeownership Opportunities Increase Affordable Housing Units Improve Existing Owner-Occupied Housing
	<b>Description</b>	The City plans to utilize CDBG and HOME funds to increase and preserve affordable housing opportunities for the community.
	<b>Basis for Relative Priority</b>	The Priority Needs identified by the City for this Consolidated Plan have all been determined to be of equally high priority.
	2	<b>Priority Need Name</b>
<b>Priority Level</b>		High
<b>Population</b>		Extremely Low Low Moderate Middle Large Families Families with Children Elderly Elderly Frail Elderly

	<b>Geographic Areas Affected</b>	Citywide
	<b>Associated Goals</b>	Improve Streets, Sidewalks and Public Facilities Improve Parks and Recreational Facilities
	<b>Description</b>	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.
	<b>Basis for Relative Priority</b>	The Priority Needs identified by the City for this Consolidated Plan have all been determined to be of equally high priority.
<b>3</b>	<b>Priority Need Name</b>	Neighborhood and Community Services
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Elderly
	<b>Geographic Areas Affected</b>	Citywide
	<b>Associated Goals</b>	Reduce and Prevent Crime Provide Recreation and Education Opportunities Reduce Blighted Conditions
	<b>Description</b>	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.
	<b>Basis for Relative Priority</b>	The Priority Needs identified by the City for this Consolidated Plan have all been determined to be of equally high priority.
<b>4</b>	<b>Priority Need Name</b>	Business and Economic Development
	<b>Priority Level</b>	Low

<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children
<b>Geographic Areas Affected</b>	Citywide
<b>Associated Goals</b>	Increase Jobs through Economic Development
<b>Description</b>	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.
<b>Basis for Relative Priority</b>	The Priority Needs identified by the City for this Consolidated Plan have all been determined to be of equally high 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

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
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, Neighborhood Investment Partners, 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 will 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

This section outlines all of the anticipated resources that will be available in the jurisdiction to address housing and community development needs throughout the 5-year term of the Consolidated Plan.

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,409,780	25,000	641,411	2,076,191	5,639,120	CDBG funds are used to benefit low/moderate income families or to eliminate blighted conditions. Prior year resources are a combination of funds allocated to activities that will not be completed by the end of the previous year and funds that were not fully utilized in the previous year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	672,734	0	1,825,750	2,498,484	2,690,937	HOME funds are used primarily to increase homeownership opportunities and for the production of affordable housing. Prior year resources are a combination of funds allocated to activities that will not be completed by the end of the previous year and funds that were not fully utilized in the previous year.

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: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	0	0	0	0	0	

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 are leveraged by being allocated to certain activities that utilize other federal, state, and private dollars. These are typically public facility and public improvement activities. These activities utilize funds received from the state for road projects. CDBG is also being utilized as Match for a Department of Transportation grant that has been received. CDBG is also allocated to public service activities that utilize other grant

sources as well as private donations. These leveraging opportunities expand the scope and impact of the CDBG funds. HOME funds are leveraged with private mortgage dollars, buyer contributions and other forms of homebuyer assistance funding. 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 CHDOs as well as other sources of private down payment assistance. The City also has eligible Match carryover that was accounted for in previous years.

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

The City has acquired the former IRS site on the riverfront. This land will be redeveloped to create housing and economic development opportunities. The City owns multiple scattered site vacant lots. These lots may be used for affordable housing development through CDBG and/or HOME. The City has allocated HOME funds to an affordable housing development on Pleasant Street utilizing multiple cityowned vacant lots that will be transferred to a non-profit housing developer.

**Discussion**

## 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; Emergency Shelter of NKY; Northern Kentucky Independent Health Department; 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 BE NKY Growth Partnership (formerly Tri-Ed); Kentucky Career Center; OneNKY

Alliance; The Catalytic Development Fund; Planning and Development Services of Kenton County; and the Covington Economic Development Authority.

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
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
<b>Street Outreach Services</b>			
Law Enforcement			
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
<b>Supportive Services</b>			
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	
<b>Other</b>			

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.

The NKY Health Department provides free HIV testing, counseling and case management. They connect persons with the appropriate resources. The Northern Kentucky Independent Health Department (NKY Health) provides various services for individuals experiencing homelessness, including medical care, mental health services, and access to food and housing resources. They partner with organizations like NeighborHUB Health to offer a range of healthcare services, including medical exams, screenings, and treatment for substance abuse and other health conditions.

The Kentucky Career Center in Northern Kentucky offers services to help individuals who are homeless find employment and regain self-sufficiency. These services include career coaching, job readiness workshops, resume assistance, networking groups, and funding for occupational training.

**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 provide 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. The City has a strong network of service providers addressing the homeless population. 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. There are gaps that exist in the delivery of these services. Most of the gaps are caused by a lack of adequate resources, not a lack of will to address the needs.

**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**

There are several strategies in place to address the gaps in the institutional structure and service delivery system for these services. The Life Learning Center is the driving force to creating these strategies. The Life Learning Center was created to be a one-stop shop to address the root causes of poverty and homelessness: the lack of financial resources due to the cycle of undereducated and underemployed individuals in the community. There were many non-profit homeless service providers in the City, but they were providing niche services to specific problem areas. The Life Learning Center offers a holistic approach and an integrated continuum of education and care to help 'at-risk' citizens.

Welcome House is utilizing the "housing first" approach to address homelessness issues. They are also greatly expanding their street outreach activities as an effort to address the gaps in the delivery of homeless services.

City leaders are working with surrounding municipalities to try to get them to be more responsive to homeless and affordable housing needs. Historically, the City of Covington has been the leader in providing homeless services and surrounding communities have not addressed homeless needs. Addressing homelessness needs to be a regional effort. Some cities have started recognizing the issue and are working on solutions. More work needs to be done by the entire region in the next five years.

New affordable housing must become more prevalent in areas where jobs and transportation are available to low-income workers. NKADD recently completed a large housing study on lack of housing units, especially affordable units, and the need for all communities to step up in their production. Covington will work closely with neighboring cities to address the housing crisis and to combine efforts to address the issue.

## 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	2025	2029	Affordable Housing	HOME Consortium Cities	Affordable Housing	HOME: \$2,500,000	Direct Financial Assistance to Homebuyers: 250 Households Assisted
2	Increase Affordable Housing Units	2025	2029	Affordable Housing	Citywide HOME Consortium Cities	Affordable Housing	HOME: \$2,541,664	Rental units rehabilitated: 2 Household Housing Unit  Homeowner Housing Added: 18 Household Housing Unit
3	Improve Existing Owner-Occupied Housing	2025	2029	Affordable Housing	Citywide	Affordable Housing	CDBG: \$1,250,000	Homeowner Housing Rehabilitated: 125 Household Housing Unit
4	Improve Streets, Sidewalks and Public Facilities	2025	2029	Non-Housing Community Development	Citywide	Public Facilities and Infrastructure Improvements	CDBG: \$2,650,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 50000 Persons Assisted
5	Improve Parks and Recreational Facilities	2025	2029	Non-Housing Community Development	Citywide	Public Facilities and Infrastructure Improvements	CDBG: \$1,250,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 50000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Reduce and Prevent Crime	2025	2029	Public Housing Non-Housing Community Development	Citywide	Neighborhood and Community Services	CDBG: \$250,000	Public service activities other than Low/Moderate Income Housing Benefit: 198000 Persons Assisted
7	Provide Recreation and Education Opportunities	2025	2029	Non-Homeless Special Needs Non-Housing Community Development	Citywide	Neighborhood and Community Services		Public service activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted
8	Increase Jobs through Economic Development	2025	2029	Non-Housing Community Development	Citywide	Business and Economic Development	CDBG: \$250,000	Businesses assisted: 2 Businesses Assisted
9	Reduce Blighted Conditions	2025	2029	Affordable Housing Non-Housing Community Development	Citywide	Neighborhood and Community Services	CDBG: \$676,555	Buildings Demolished: 10 Buildings  Housing Code Enforcement/Foreclosed Property Care: 500 Household Housing Unit  Other: 5 Other

Table 53 – Goals Summary

## Goal Descriptions

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

8	<b>Goal Name</b>	Increase Jobs through Economic Development
	<b>Goal Description</b>	The City will allocate funds towards economic development loans and business assistance programs to increase job opportunities for low-income residents.
9	<b>Goal Name</b>	Reduce Blighted Conditions
	<b>Goal Description</b>	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)**

CDBG: approximately 50 extremely low-income, 65 low-income, and 10 moderate-income families will be provided affordable housing.

HOME: approximately 20 extremely low-income and 250 low-income families will be provided affordable housing.

## **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**

Youth Programs are mainly held during the summer. Summer programs included the STAR Program, the YES Program, the Teen Summer Work Program (TSWP), Summer Lunch Program, and Summer Camp at Camp Ernst.

Throughout the year, efforts will be made to provide a variety of adult and senior programming. Participating adult residents will make strides towards furthering employment opportunities and the pursuit of higher education, through HAC's SEED and FSS Programs. Monthly educational and social events will be held at Golden Tower

Community service includes performing work or duties for the public benefit that serve to improve the quality of life and/or enhance resident self-sufficiency, and/or increase the self-responsibility of the resident within the community.

An economic self-sufficiency program is one that is designed to encourage, assist, train or facilitate the economic independence of participants and their families or to provide work for participants. These programs may include programs for job training, work placement, basic skills training, GED, post-secondary education, certificate programs, English proficiency, Job Fair, financial or household management, apprenticeship, and any program necessary to prepare a participant to work including but not limited to such as substance abuse or mental health counseling.

The Housing Authority of Covington will coordinate with social service agencies, local schools, and the Human Resources Office in identifying a list of volunteer community service positions. To date, we collaborate with the Covington Independent School District, Brighton Center, Ida Spence Mission Church, NKCAC and St Augustine Parish outreach Center.

Together with the resident advisory councils, the Housing Authority of Covington may create volunteer positions such as facilitating summer lunch programs, litter patrols, flyer distribution and record keeping.

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

No

## **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, 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 form-based zoning code. This new code makes 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.

The City recently announced the formation of a Housing Development Taskforce aimed at unlocking the city’s potential for equitable residential growth. The taskforce, comprised of respected developers, nonprofit leaders, educators, and planners, will serve as the city’s strategic engine for housing policy — identifying opportunities, clearing regulatory roadblocks, and guiding investment into accessible, income-aligned housing. The effort comes in the wake of a 2023 Northern Kentucky Area Development District study that found the region will need 6,650 new housing units by 2028. Covington alone needs 891. A centerpiece of the initiative involves revitalizing the city’s inventory of vacant and abandoned

properties — parcels that once fell into city hands through anti-blight enforcement but now represent opportunity. Many of these lots are currently tax delinquent and cost the city money in maintenance and public works response.

The taskforce's mandate includes:

- Expanding Covington's inventory of workforce housing;
- Protecting the historic fabric of neighborhoods;
- Breathing life into empty streetscapes with new homes;
- Reducing the fiscal burden of blighted and abandoned properties.

## **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 their 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.

**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. The region could 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. NKY Legal Aid Society provides services to help prevent evictions.

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 need support services. The City will utilize a large portion of their HOME-ARP grant for supportive services.

The region needs 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. 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 describe many models in their research that are working for youth.

HUD has highlighted many innovative models for housing in their Homeless Assistance Program mailing list, including workforce housing, housing connected to medical care, Veteran housing, etc.

KHC has funding for 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. They refer families to Brighton Center's TBRA Program.

## **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.

### **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 24 CFR 35.1330 or 2) using standard treatments on all surfaces presumed to contain lead or be a lead hazard and according to 24 CFR 35.1335. A clearance exam by a licensed lead paint inspector, risk assessor, or lead sampling technician will be performed at the completion of each job. Clearance according to 24 CFR 35.1340 must be achieved prior to closing out the file.

Programs with assistance over \$25,000: Homes built in the year 1978 or prior will have a risk assessment and paint inspection performed by a licensed lead paint risk assessor/inspector. Abatement will be performed according to the risk assessment/inspection report and 24 CFR 35.1325. A clearance exam by a licensed lead paint inspector, risk assessor, or lead sampling technician will be performed at the completion of each job. Clearance according to 24 CFR 35.1340 must be achieved prior to closing out the file.

## **SP-70 Anti-Poverty Strategy – 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.

The Kentucky Career Center, located in Covington, offers a variety of services designed to help families escape poverty, including job training, career counseling, and support services like childcare and transportation assistance. These services aim to help individuals find employment, increase their earning potential, and become self-sufficient.

### **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 Economic 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 Program 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 Program 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 Program 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

This section outlines all of the anticipated resources that will be available in the jurisdiction to address housing and community development needs throughout the 5 year term of the Consolidated Plan.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,409,780.00	25,000.00	641,411.00	2,076,191.00	5,639,120.00	CDBG funds are used to benefit low/moderate income families or to eliminate blighted conditions. Prior year resources are a combination of funds allocated to activities that will not be completed by the end of the previous year and funds that were not fully utilized in the previous year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	672,734.30	0.00	1,825,750.00	2,498,484.30	2,690,937.20	HOME funds are used primarily to increase homeownership opportunities and for the production of affordable housing. Prior year resources are a combination of funds allocated to activities that will not be completed by the end of the previous year and funds that were not fully utilized in the previous year.

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: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	0.00	0.00	0.00	0.00	0.00	

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 are leveraged by being allocated to certain activities that utilize other federal, state, and private dollars. These are typically public facility and public improvement activities. These activities utilize funds received from the state for road projects. CDBG is also being utilized as Match for a Department of Transportation grant that has been received. CDBG is also allocated to public service activities that utilize other grant sources as well as private donations. These leveraging opportunities expand the scope and impact of the CDBG funds. HOME funds are leveraged

with private mortgage dollars, buyer contributions and other forms of homebuyer assistance funding. 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 CHDOs as well as other sources of private down payment assistance. The City also has eligible Match carryover that was accounted for in previous years.

**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 has acquired the former IRS site on the riverfront. This land will be redeveloped to create housing and economic development opportunities. The City owns multiple scattered site vacant lots. These lots may be used for affordable housing development through CDBG and/or HOME. The City has allocated HOME funds to an affordable housing development on Pleasant Street utilizing multiple city owned vacant lots that will be transferred to a non-profit housing developer.

**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	2025	2029	Affordable Housing	Citywide HOME Consortium Cities	Affordable Housing	HOME: \$500,000.00	Direct Financial Assistance to Homebuyers: 50 Households Assisted
2	Increase Affordable Housing Units	2025	2029	Affordable Housing	Citywide HOME Consortium Cities	Affordable Housing	HOME: \$1,741,664.00	Homeowner Housing Added: 12 Household Housing Unit
3	Improve Existing Owner Occupied Housing	2025	2029	Affordable Housing	Citywide	Affordable Housing	CDBG: \$250,000.00	Homeowner Housing Rehabilitated: 25 Household Housing Unit
4	Improve Streets, Sidewalks and Public Facilities	2025	2029	Non-Housing Community Development	Citywide	Public Facilities and Infrastructure Improvements	CDBG: \$850,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted
5	Improve Parks and Recreational Facilities	2025	2029	Non-Housing Community Development	Citywide	Public Facilities and Infrastructure Improvements	CDBG: \$250,000.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Reduce and Prevent Crime	2025	2029	Public Housing Non-Housing Community Development	Citywide	Neighborhood and Community Services	CDBG: \$50,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 39600 Persons Assisted
7	Provide Recreation and Education Opportunities	2025	2029	Non-Homeless Special Needs Non-Housing Community Development	Citywide	Neighborhood and Community Services	CDBG: \$149,819.00	Public service activities other than Low/Moderate Income Housing Benefit: 39600 Persons Assisted
8	Reduce Blighted Conditions	2025	2029	Affordable Housing Non-Housing Community Development	Citywide	Neighborhood and Community Services	CDBG: \$135,311.00	Buildings Demolished: 2 Buildings Housing Code Enforcement/Foreclosed Property Care: 100 Household Housing Unit Other: 1 Other
9	Increase Jobs through Economic Development	2025	2029	Non-Housing Community Development	Citywide	Business and Economic Development	CDBG: \$50,000.00	Businesses assisted: 2 Businesses Assisted

Table 55 – Goals Summary

**Goal Descriptions**

1	<b>Goal Name</b>	Expand Homeownership Opportunities
	<b>Goal Description</b>	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. This goal is also supported by CDBG funds allocated for program delivery costs and program administration.
2	<b>Goal Name</b>	Increase Affordable Housing Units
	<b>Goal Description</b>	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 non-profit developers to acquire and rehabilitate homes for sale to low-income homebuyers. CDBG funds will also support this goal with funds allocated for affordable housing planning activities. This goal is also supported by CDBG funds allocated for program administration.
3	<b>Goal Name</b>	Improve Existing Owner Occupied Housing
	<b>Goal Description</b>	The City will allocate CDBG funds to the Homeowner Repair Program. This program provides grants to low-income homeowners to address urgent home repair needs such as furnaces, water heaters, roof and gutter systems, and other life safety issues. This goal is also supported by CDBG funds allocated for program delivery costs and program administration.
4	<b>Goal Name</b>	Improve Streets, Sidewalks and Public Facilities
	<b>Goal Description</b>	The City will allocate CDBG funds for public improvements including street repairs, street resurfacing, streetscape improvement projects, and other roadway and public facility repairs. This goal is also supported by CDBG funds allocated for program administration.
5	<b>Goal Name</b>	Improve Parks and Recreational Facilities
	<b>Goal Description</b>	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. This goal is also supported by CDBG funds allocated for program delivery costs and program administration.
6	<b>Goal Name</b>	Reduce and Prevent Crime
	<b>Goal Description</b>	The City will allocate CDBG funds for crime prevention efforts in targeted high crime areas and community policing programs.

7	<b>Goal Name</b>	Provide Recreation and Education Opportunities
	<b>Goal Description</b>	The City will allocate CDBG funds for recreation programs and educational opportunities for children and youth.
8	<b>Goal Name</b>	Reduce Blighted Conditions
	<b>Goal Description</b>	The City will allocate CDBG funds for activities that are aimed at reducing blighted properties and conditions in the City. Activities planned include demolition of blighted properties, stabilization of blighted properties and increased code enforcement. This goal is also supported by CDBG funds allocated for program administration.
9	<b>Goal Name</b>	Increase Jobs through Economic Development
	<b>Goal Description</b>	The City will allocate CDBG funds for Section 108 payments on loans that assisted businesses to create or retain jobs.

# 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 and Planning
2	HOME Program Administration
3	Rehab Administration
4	Homebuyer Assistance Program
5	CHDO/other Affordable Housing Development
6	Homeowner Repair Program for Emergency Repairs
7	Code Enforcement
8	Early Education and Recreation Programs
9	Police Anti-Crime Program
10	CDBG Housing Services- HOME Program Delivery Costs
11	Public Improvements
12	Park Improvements
13	Demolition/Acquisition of Blighted Structures
14	Section 108 Payments

Table 56 – Project Information

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

The lack of adequate financial resources is the biggest obstacle to addressing underserved needs. There is not enough funding available to address the affordable housing gap or the shortage of supportive services and housing for the homeless. The city also has a large inventory of aging housing stock, both owner and rental, in need of rehabilitation.

To address these needs, the City will continue to fund homeowner rehab and affordable housing development programs. Priority projects have been identified for the Program Year. These priorities arise from community input as well as staff evaluation regarding needs. CDBG funds will be allocated

strategically to work together and to also leverage other funding sources. This will allow the allocation of CDBG funds to these projects to have the greatest impact to the community.

HOME funding will be prioritized to address the shortage of affordable housing for homeownership and rental. The HOME program will support increasing affordable housing and homeownership opportunities through down payment assistance programs, and by creating new affordable homeownership, lease to own units, and rental housing.

**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	CDBG Administration and Planning
	<b>Target Area</b>	Citywide HOME Consortium Cities
	<b>Goals Supported</b>	Expand Homeownership Opportunities Increase Affordable Housing 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 Reduce Blighted Conditions
	<b>Needs Addressed</b>	Affordable Housing Public Facilities and Infrastructure Improvements Neighborhood and Community Services Business and Economic Development
	<b>Funding</b>	CDBG: \$175,561.00
	<b>Description</b>	This project funds the administration of the CDBG Program and CDBG community development planning activities.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Program administration costs include staff and related costs required for planning activities, overall program management, coordination, monitoring, reporting, recordkeeping, and evaluation. Planning activities to occur in PY 2025 are for affordable housing development.
<b>2</b>	<b>Project Name</b>	HOME Program Administration
	<b>Target Area</b>	Citywide HOME Consortium Cities
	<b>Goals Supported</b>	Expand Homeownership Opportunities Increase Affordable Housing Units Reduce Blighted Conditions
	<b>Needs Addressed</b>	Affordable Housing

	<b>Funding</b>	HOME: \$46,085.00
	<b>Description</b>	This project funds administrative costs for the HOME Program.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will benefit approximately 60 low-income families through the development of affordable housing.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Program administration costs include staff and related costs required for overall program management, coordination, monitoring, reporting, recordkeeping, and evaluation.
<b>3</b>	<b>Project Name</b>	Rehab Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Improve Existing Owner Occupied Housing Reduce Blighted Conditions
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$102,733.00
	<b>Description</b>	This project funds staff and related delivery costs to administer CDBG funded residential rehab programs.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The administration of rehab programs will benefit approximately 25 low/mod-income homeowners.
	<b>Location Description</b>	Rehab programs are available city-wide to low/mod-income homeowners.
	<b>Planned Activities</b>	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.
<b>4</b>	<b>Project Name</b>	Homebuyer Assistance Program
	<b>Target Area</b>	Citywide HOME Consortium Cities

	<b>Goals Supported</b>	Expand Homeownership Opportunities Increase Affordable Housing Units
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$500,000.00
	<b>Description</b>	This project is an interest-free, deferred loan program to assist low-income homebuyers with lender required down payment and closing costs to facilitate affordable homeownership.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will benefit approximately 50 low-income homebuyers.
	<b>Location Description</b>	This program is available to low-income homebuyers city-wide in the Northern Kentucky HOME Consortium member cities of Covington, Ludlow, Erlanger, Florence, Independence, Newport, Bellevue, and Dayton.
	<b>Planned Activities</b>	This is an interest-free, deferred loan program to assist low-income homebuyers with lender required down payment and closing costs to facilitate affordable homeownership.
5	<b>Project Name</b>	CHDO/other Affordable Housing Development
	<b>Target Area</b>	Citywide HOME Consortium Cities
	<b>Goals Supported</b>	Expand Homeownership Opportunities Increase Affordable Housing Units Reduce Blighted Conditions
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$1,741,664.00
	<b>Description</b>	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 CHDOs and funds CHDO activities more than the minimum required set-aside. Other nonprofit and for-profit housing developers that may not qualify as CHDOs can participate in this project.
	<b>Target Date</b>	6/30/2026

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will benefit approximately 12 low-income households.
	<b>Location Description</b>	Five current CHDO projects have been approved and are in the construction phase. Three projects are located in Newport with Entryway, Inc. (CHDO serving Newport). One project is located on 43rd Street in Covington and one on Russell Street in Covington with Housing Opportunities of Northern Kentucky, Inc. (CHDO serving Covington). The City is working to redevelop a group of vacant parcels/vacant structures located on Pleasant Street in Covington. These properties are all city-owned. These projects will all be completed in PY 2025.
	<b>Planned Activities</b>	Single-family housing rehab or new construction to create new affordable housing units for homeownership, rental, or lease to own. This activity includes the required CHDO set aside for PY 2025 as well as funds from prior years and recaptured funds that are being re-allocated for new CHDO projects. The 15% required CHDO set aside for PY 2025 is \$100,910. The City of Covington typically allocates more than the minimum 15% required for CHDO housing development activities. The City will issue RFPs for new construction/reconstruction for affordable homeownership for the Pleasant Street project. This project will create approximately 8 new units.
6	<b>Project Name</b>	Homeowner Repair Program for Emergency Repairs
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Improve Existing Owner Occupied Housing Reduce Blighted Conditions
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$250,000.00
	<b>Description</b>	The City's Homeowner Repair Program is designed to assist low/mod income homeowners with urgent home repair needs. The Program will assist homeowners by providing grants for emergency repairs such as furnace, electrical, plumbing, roof, and sewer lateral repairs. The program also includes accessibility repairs and improvements such as railings and handicap ramps.
	<b>Target Date</b>	6/30/2026

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This activity will assist approximately 25 households. This activity is for low/mod-income households only with a preference given to elderly, disabled and veteran households.
	<b>Location Description</b>	This activity is available city-wide on a first-come, first-served basis.
	<b>Planned Activities</b>	Single-family, owner-occupied, residential rehab to address urgent/emergency home repairs.
7	<b>Project Name</b>	Code Enforcement
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Reduce and Prevent Crime Reduce Blighted Conditions
	<b>Needs Addressed</b>	Neighborhood and Community Services
	<b>Funding</b>	CDBG: \$60,311.00
	<b>Description</b>	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.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Code Enforcement is performed in targeted low/mod-income census tracts/block groups to benefit low/mod-income residents.
	<b>Location Description</b>	Targeted low/mod census tracts/block groups that have been designated as deteriorated areas receiving other investments to arrest the decline of the area. For PY 2025, code enforcement will focus on the following neighborhoods: Eastside, Austinburg, Helentown, Levassor Park, and Wallace Woods.
<b>Planned Activities</b>	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.	

8	<b>Project Name</b>	Early Education and Recreation Programs
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Provide Recreation and Education Opportunities
	<b>Needs Addressed</b>	Neighborhood and Community Services
	<b>Funding</b>	CDBG: \$149,819.00
	<b>Description</b>	This project funds two public service activities. The Covington Early Literacy Initiative/Read Ready Program which is an early literacy campaign targeted to children from birth to the 3rd grade and Parks and Recreation programming.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will provide education and recreation programs that serve Covington children and parents.
	<b>Location Description</b>	The early literacy activity is available to families whose children attend schools located within the boundaries of the Covington public and private school systems. Recreation programs are offered at City park facilities that serve low/mod income neighborhoods.
<b>Planned Activities</b>	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 Footsteps 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. Covington Parks and Recreation will provide recreation and educational programs for Covington residents at City park facilities that serve low/mod income neighborhoods.	
9	<b>Project Name</b>	Police Anti-Crime Program
	<b>Target Area</b>	Citywide

	<b>Goals Supported</b>	Reduce and Prevent Crime
	<b>Needs Addressed</b>	Neighborhood and Community Services
	<b>Funding</b>	CDBG: \$50,000.00
	<b>Description</b>	This project funds additional police patrols, community policing and crime prevention efforts in targeted areas of high crime as identified by the Police Department.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will fund activities that benefit all residents in targeted low-mod income census tracts on an area basis.
	<b>Location Description</b>	This activity will be targeted to high crime areas identified by the Police Department.
	<b>Planned Activities</b>	Additional police patrols in targeted areas of high crime, community policing strategies, crime prevention efforts.
10	<b>Project Name</b>	CDBG Housing Services- HOME Program Delivery Costs
	<b>Target Area</b>	Citywide HOME Consortium Cities
	<b>Goals Supported</b>	Expand Homeownership Opportunities Increase Affordable Housing Units Reduce Blighted Conditions
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$91,022.00
	<b>Description</b>	This project funds activity delivery costs to administer the City's HOME funded programs and projects.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will benefit approximately 62 low-income households.
	<b>Location Description</b>	This project will fund HOME funded homeownership and rental activities that are available citywide in the HOME Consortium cities.

	<b>Planned Activities</b>	Homebuyer Assistance programs are available city-wide in Covington, Ludlow, Erlanger, Florence, Independence, Newport, Bellevue, and Dayton. There will be approximately 13 CHDO/other affordable housing development rehab/new construction projects for low-income homeownership that will occur.
<b>11</b>	<b>Project Name</b>	Public Improvements
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Improve Streets, Sidewalks and Public Facilities
	<b>Needs Addressed</b>	Public Facilities and Infrastructure Improvements
	<b>Funding</b>	CDBG: \$850,000.00
	<b>Description</b>	This project will fund public improvements including street resurfacing, installation of ADA sidewalk ramps, streetscape enhancements, and other road and infrastructure improvements.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Public improvements will occur in low/mod-income neighborhoods to benefit all residents of those neighborhoods.
	<b>Location Description</b>	
<b>Planned Activities</b>	Street resurfacing, installation of ADA sidewalk ramps, streetscape enhancements and public facility improvements.	
<b>12</b>	<b>Project Name</b>	Park Improvements
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Improve Parks and Recreational Facilities
	<b>Needs Addressed</b>	Public Facilities and Infrastructure Improvements
	<b>Funding</b>	CDBG: \$250,000.00
	<b>Description</b>	This project will fund facility improvements to the City's parks and recreation facilities. A parks plan was completed to prioritize and set a schedule for ongoing parks improvements.
	<b>Target Date</b>	6/30/2026

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Park improvements will occur at City park facilities that serve low/mod-income neighborhoods to benefit all residents in those neighborhoods.
	<b>Location Description</b>	Park improvements are planned at 35th and Carlisle Park, Father Hanses Park, and Barb Cook Park.
	<b>Planned Activities</b>	Activities will include the installation of new playground equipment, park signage, picnic tables, trash cans, bike racks, dog waste stations, and other amenities.
<b>13</b>	<b>Project Name</b>	Demolition/Acquisition of Blighted Structures
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Reduce Blighted Conditions
	<b>Needs Addressed</b>	Neighborhood and Community Services
	<b>Funding</b>	CDBG: \$75,000.00
	<b>Description</b>	This project funds the demolition and clearance of blighted structures and/or the acquisition of blighted structures.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	The demolition and clearance of blighted, nuisance and hazardous properties. The acquisition of blighted, nuisance and hazardous properties.
<b>14</b>	<b>Project Name</b>	Section 108 Payments
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Increase Jobs through Economic Development
	<b>Needs Addressed</b>	Business and Economic Development
	<b>Funding</b>	CDBG: \$50,000.00
	<b>Description</b>	Section 108 Payments: This activity is the City's scheduled payments to HUD for funds advanced for Section 108 Loan activities.

	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Quarterly payments to HUD for previous Section 108 loan advances.

## 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 consists of predominantly low/mod-income census tracts/block groups. CDBG public improvement activities are directed to these areas to benefit low/mod-income residents on an area basis. These investments are often targeted with other development efforts to maximize public benefit.

Some CDBG activities are available city-wide. These include home repair programs and public service activities like the Early Literacy Initiative and Crime Prevention programs. Home Repair programs are only available to low/mod-income households and are prioritized to very low- and extremely low-income households.

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. HOME funds will also be targeted to the Eastside neighborhood. This neighborhood contains census tracts 670 and 671 which have the highest percentage of African American population in the City. The City own multiple lots in this neighborhood and plans to develop a HOME funded affordable housing project here.

### Geographic Distribution

Target Area	Percentage of Funds
Citywide	100
HOME Consortium Cities	100

Table 57 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

There are low/mod-income census tracts throughout the City and the HOME Consortium. Therefore, most federal funding is targeted to specific projects to alleviate substandard conditions or is available citywide to benefit all low/mod-income residents. CDBG and HOME funded programs that benefit individual households are available citywide and citywide in all cities of the HOME Consortium.

Affordable housing development is somewhat targeted to areas that the City's nonprofit partners may be focusing on based on previous projects. Some HOME funding in PY 2025 will be focused in Covington's Eastside neighborhood because the City has control of multiple parcels on Pleasant Street and adjoining streets. Having site control of these parcels will allow multiple new housing development

projects to occur in the same neighborhood.

## 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 2025-2026 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. Programs that will provide these units through HOME are the Homebuyer Assistance Program and CHDO/other housing development.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	85
Special-Needs	0
Total	85

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

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	10
Rehab of Existing Units	25
Acquisition of Existing Units	50
Total	85

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

#### Discussion

The CDBG Homeowner Repair Program will assist the rehab of 25 units. The Homebuyer Assistance Program will assist in the acquisition of 50 existing units for homebuyers.

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. They are primarily homeownership, but they may be lease-purchase projects or rental. These will be currently vacant units, so they are considered production of "new units". There will also be new affordable housing development for homeownership that will be conducted in partnership with other nonprofit housing developers that are not designated as CHDOs. In total, the goal for the production of new units is 10 units.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Housing Authority of Covington (HAC) owns, manages, and maintains over 450 public housing and project-based vouchers units at the following family and senior sites in Covington, KY. Family Sites:

Latonia Terrace (235)

Eastside Revitalization I (24)

New Site Properties (19)

Senior Sites (62+ and/or 50-61 disabled):

Golden Tower (155)

Academy Flats (26)

HAC also manages new construction and modernization activities, based on funding availability.

Beginning on July 1, 2025, the Housing Authority of Covington will take over administration of the HUD/Housing Choice Voucher (HCV) Program for Kenton County. The HCV Program assists low and very low-income families, as well as the elderly and disabled, to afford decent, safe, and sanitary housing on the private market. HCV program staff administer approximately 900-1000 vouchers annually.

In 2021-2022, Neighborhood Investment Partners (NIP), a 501c3 non-profit, assumed the management of three family sites formerly under HAC's housing portfolio. They are Emery Drive Apartments (69), Eastside Revitalization II (33) and Eastside Revitalization III (31).

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

In late 2023, both the HAC and City of Covington Commissions approved the consolidation of the public housing and HCV programs under HAC's authority. Both entities formally requested HUD approval for consolidation in 2024 and was approved in 2025. HAC will begin administering the HCV Program on July 1, 2025. These programs fill some of the need for public and affordable housing. Both have many applicants on their respective waiting lists, indicating a shortage of affordable rental housing in the area.

As public housing units and vouchers become available, new families are enrolled. All families enrolled into these housing programs are required to attend briefings to become knowledgeable about the requirements of their rental housing program.

HCV staff continue to implement landlord recruitment strategies. Currently, there is a shortage of

landlords in the service area willing to participate in the program.

In 2021, the Housing Authority of Covington (HAC) received approval for a disposition plan for the City Heights community. All tenants have been successfully relocated. HAC plans to market the property for sale and proceeds from the sale will be used to renovate/upgrade other existing public housing communities in the portfolio.

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

The Housing Authority of Covington (HAC) encourages and supports resident engagement to foster the mission of the organization. HAC facilitates focus groups with residents each year to help inform the strategic planning process and to improve properties and operations. There are two active Resident Councils, voted on by tenants, who represent the interests of tenants and their families. These Resident Councils plan resident programs and events that help build and enrich the community. In addition, each year, HAC requests the Resident Advisory Board (RAB), consisting of all Resident Council officers, to participate in a meeting to review proposed changes to the agency's lease, housing policies and tenant charges. This year's meeting notes are available at [www.hacov.org](http://www.hacov.org).

The Housing Authority of Covington collaborates with more than 20 community organizations to serve the needs of their resident population. The Housing Authority of Covington also administers the Family Self-Sufficiency (FSS) Program for residents of both public housing and the housing choice voucher programs. The FSS program fosters greater resident self-sufficiency through educational and work readiness programs, case management services and rent incentives designed to build resident savings and wealth.

The Neighborhood Services Department, at the City of Covington, partners with HAC and HCV program staff 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.

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

### **Introduction**

The City of Covington is part of the Kentucky Balance of State Continuum of Care (CoC). The goal of the CoC is to end homelessness through support programs, rapid re-housing, and permanent housing opportunities. According to The Gap Report by the National Low Income Housing Coalition, 650,000 people experienced homelessness in the United States in 2023. On a more local level, the 2023 K-Count, published by the Kentucky Housing Corporation, estimates that 167 individuals experienced homelessness in Kenton County, 45 individuals experienced homelessness in Boone County, and 70 experienced homelessness in Campbell County on a given night.

While there can be many causes of homelessness, the root causes are generally lack of affordable housing, unemployment or underemployment, disabilities, domestic violence, serious mental illness, and substance abuse.

Housing instability, which causes residents to be at risk of homelessness, is mainly caused by cost burden and severe cost burden. Other issues include overcrowding and substandard housing. The most recent Comprehensive Housing Affordability Study (CHAS) identifies housing problems and burdens for owners and renters. The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%. Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. Cost burden exists when housing costs are between 30%-50% of gross income. Severe cost burden exists when housing costs exceed 50% of gross income.

Housing problems and cost burdens are more often experienced by renters than owners. In Boone, Campbell, and Kenton County there are 16,975 owners and 17,375 renters with housing problems. There are 7,185 owners and 9,865 renters with severe housing problems. There are 10,040 owners and 7,809 renters with cost burden. There are 5,925 owners and 8,284 renters with severe cost burden. Affordability is a major obstacle for renters in Boone, Campbell, and Kenton Counties. In PY 2024, the City will continue to work with these agencies to fund and support homeless programs and services. HOME-ARP funds will be allocated as well to address these issues.

### **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**

Multiple agencies have outreach programs to reach unsheltered and potentially homeless persons.

Welcome House administers the Gaining Access through Programs and Support (GAPS) program, the Homeless Services (HSP) program and the Continuum of Care Unsheltered Northern Kentucky Supportive Services program which assists homeless individuals and families to connect with assistance programs and housing. All these programs support the street outreach team to identify homeless individuals. The Brighton Center and the Veteran's Association also have street outreach programs to unsheltered persons and connects them with shelter, services, and access to other assistance.

Brighton Center has a Street Outreach program for youth ages 16-22. 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 their Rapid Rehousing Program, Brighton Center staff provides outreach in the community and responds 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.

The Emergency Shelter of Northern Kentucky has Street Outreach that goes out into Covington & Kenton County to connects to unsheltered adults 18+ by providing referrals to ESNKY emergency shelter beds, transitional housing work program beds, shower and laundry program and all other services in our Navigation & Engagement Center. Families as well as youth (under 16) that are encountered are referred to other agencies for support and services not provided at ESNKY. ESNKY mobile outreach is out in the community at scheduled locations and responds to calls from city, county and concerned residents.

The City has allocated \$695,103 in HOME-ARP funds for homeless supportive services. The City will make these funds available to local agencies that operate supportive services programs.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Emergency shelter is offered to two-parent families, single men with children, single women, and women with children by Welcome House, Inc. The Emergency Shelter of NKY provides shelter to single men and women. Fairhaven Rescue Mission offers shelter to single men. Welcome House provides transitional housing to veterans and the disabled homeless population. Brighton Center offers shelter to unaccompanied youth under the age of 18.

The Emergency Shelter of Northern Kentucky (ESNKY) provides shelter and services to single adults 18+ through several programs and services. Emergency Shelter is provided to adult men year-round along, the winter cold shelter is for all adults from November – March and these are night by night shelter beds. Transitional housing work program beds are for men year-round and available for women during the winter cold shelter (Nov- March). The Navigation & Engagement Center includes daily daytime shower and self-service laundry program, community partners rooms that over 40 community partner

agencies and companies utilize to meet guests of shelter in the areas of mental health, case management, legal, employment, health insurance providers, NKY Health Department, substance use disorder providers, sober living, veterans' administration to name just a few. Other services include onsite healthcare clinic to meet the immediate medical needs in an urgent care setting, vaccination clinics, NKY Health Department screenings, prevention, and referrals.

Across the nation, 2/3 of the population experiencing homelessness is a single adult with 78% being men. In KY, Kentucky Housing Corporation announced that homelessness in the Balance of State (118/120 counties) is up 15% year over year and this includes unsheltered, first time homeless and employed homeless. ESNKY is seeing an increase in the number of adults visiting the shower & laundry program that are employed, living in their car and/or because a shelter bed is not available. The transitional housing work program participants are exiting shelter back to family, friends, and private market rentals. We are seeing an increase in length of time in shelter in emergency shelter beds due to lengthy wait times for case management and the decreasing number of landlords accepting any type of housing voucher assistance. We are also seeing an increase in the number of older adults that are first time homeless with complex medical needs requiring long term care. Additional details can be found on KHC website: <https://www.kyhousing.org/Programs/Homeless-Programs/Pages/KYHMISDashboards.aspx>

Welcome House's GAPS, HSP and CoC Unsheltered programs work with homeless individuals and families to address their transitional housing needs while also working with them on permanent housing solutions.

Brighton Center provides emergency shelter for homeless youth. They also support the efforts of Women's Crisis Center, NKY Emergency Shelter, and Welcome House and others to strengthen the continuum of care in NKY.

In reviewing the shelter inventory for the HOME-ARP Allocation Plan, the gaps analysis revealed that there is a small gap in needed shelter beds, especially for single, adult men.

**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 City of Covington has completed extensive consultation for the HOME-ARP allocation process to determine the needs of homeless agencies in the region. Agencies that offer programs to transition people from homelessness to permanent housing include Welcome House of Northern KY, Brighton Center, NorthKey, and the Center for Independent Living Options. These agencies administer multiple programs to assist homeless individuals make the transition to permanent housing and independent

living.

Center for Independent Living Options offers housing for persons with disabilities, a supportive housing program utilizing scattered site units and providing support services for homeless individuals with disabilities.

Welcome House provides the following programs and services to people experiencing homelessness:

- Homeless Street Outreach
- Mobile Medical Services – Welcome House has a full-time Nurse on the mobile RV assisting w/wound care and connecting participants to medical services.
- Medical Respite-(10 bed facility- Medical respite care is acute and post-acute care for persons experiencing homelessness)-closely working with St. Elizabeth and St. E physicians
- Diversion Assessment
- Emergency Shelter
- Case Management
- Supportive Housing Case Management – once housed clients receive supportive case management to ensure they stay housed
- Permanent Supportive Housing (rent subsidy for those that are disabled)
- Rapid Rehousing (temporary rental assistance)
- Veterans Transitional Housing Program – Transitional housing for 10 NKY veterans
- Tenant-Based Rent Assistance Program – rent subsidy for individuals and families
- Prevention Program (paying back-due rent utilities)
- Social Security Benefits Assistance (helping homeless individuals apply for Social Security disability benefits)
- Representative Payee Services (managing client funds for those that are cognitively/physically unable to manage their funds)
- 20 units of subsidized housing for single parents experiencing homelessness
- 73 Units of Affordable Housing – preference given to those experiencing homelessness, disabled, or veterans

Brighton Center provides the following programs and services to people experiencing homelessness:

- Unaccompanied Youth Shelter
- Employment/Career Training
- Financial Management Training

Additional programs and resources are needed to address and prevent homelessness. Providing the supportive services such as case management, job training, education, access to benefits, emergency assistance, mental and physical health treatment are critical. Other programs such as Financial Self-Sufficiency Programs and Individual Development Accounts are effective tools. Increasing affordable housing options will also help to alleviate homelessness.

The City of Covington plans to allocate \$695,103 in HOME-ARP funds for homeless supportive services

programs.

**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**

Through the HOME-ARP consultation process, one of the main recurring themes from multiple agencies was that homeless prevention is the best way to reduce and ultimately end homelessness. The City will work with these agencies on efforts to prevent homelessness, including allocating HOME-ARP funds for these efforts.

Agencies that administer programs to assist individuals and families to avoid becoming homeless include Brighton Center, NorthKey, and Welcome House of Northern KY.

Brighton Center provides the following services to assist individuals and families divert from entering the homeless services system:

- Community & Youth Services – including those individuals exiting foster care
- Early Childhood Education
- Employment & Workforce Services
- Family Services
- Financial Wellness
- Housing
- Recovery Services
- Senior Support
- Assessment and referral services

Brighton Center also has a Transitional Living program for youth aging out of foster care. Youth are provided with financial assistance to obtain an apartment and then provide 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 describe many models in their research that are working for youth.

Welcome House provides the following services to assist individuals and families divert from entering homeless services system:

- Homeless Street Outreach
- Mobile Medical Services Medical Respite
- Medical Respite
- Assessment, referral and Diversion services
- Case Management
- Supportive Housing Case Management – once housed clients receive supportive case management to

ensure they stay housed

- Prevention Program (paying back-due rent utilities)
- Representative Payee Services (managing client funds for those that are cognitively/physically unable to manage their funds)
- 20 units of subsidized housing for single parents experiencing homelessness
- 73 Units of Affordable Housing – preference given to those experiencing homelessness, disabled or Veterans

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 also funded some innovative models related to assisted living and workforce housing. The City of Covington provides programs and services directly to help prevent homelessness including public housing units; Housing Choice Voucher Program; home repair programs; and assisting residents with seeking out financial counseling programs and foreclosure prevention programs.

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

### **Introduction:**

According to the 2025 Gap Report by the National Low Income Housing Coalition, there is a substantial lack of affordable housing in the United States which has worsened over the past few years. This shortage has disproportionately affected people of color, seniors, and people with disabilities. Rising rent costs and lingering effects of the pandemic have also exacerbated these issues.

Some of the statistics cited in the Gap Report include:

- Extremely low-income renters face a shortage of 7.1 million affordable and available rental units.
- Between 2019 and 2022, the shortage of affordable rental units for extremely low-income renters increased by 480,000.
- Extremely low-income renters are more likely to spend a large share of their income on rent. 87% are cost-burdened and 74% are extremely cost-burdened.
- The shortage of affordable and available units affects all states and the 50 largest metro areas, none of which have an adequate supply.
- Extremely low-income renters account for 24% of the nation’s renters.
- Due to the lack of supply, extremely low-income and low-income renters are competing with higher income households for the same available units.
- Federal, State, and local governments all play an integral role in improving access to and availability of affordable housing.

According to the Phase I: Housing Supply Gap Analysis conducted by the KY Housing Corporation for the State of Kentucky; Kentucky has an overall housing gap of 206,207 units. The largest overall gap is for extremely low-income families with a gap of 79,819 units for these families.

Barriers to affordable housing in the City of Covington include lack of available land, lack of monetary resources, and cost of property rehabilitation. There has also been hesitancy from property owners to participate in public/affordable housing programs. There are 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**

A few years ago, the City of Covington created a new code of zoning ordinances. There were factors in the old code that may have had negative effects on affordable housing development. Factors that previously existed that were modified to be less onerous to development included 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 new zoning code changed from a Euclidian model to a “form” based code that allowed for more flexibilities in housing development especially regarding local historic preservation guidelines.

The City will follow the planned actions in the Housing Supply Action Plan from the Biden Administration to see if any of the proposed strategies should be implemented locally.

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. In the past year, the City added two more neighboring cities, Florence, and Independence, to the NKY HOME Consortium. This expanded the footprint for where HOME funds can be allocated for affordable housing development.

**Discussion:**

The City creates affordable housing opportunities through the Homebuyer Assistance Program and HOME Housing Development. The City preserves affordable housing through its residential rehab programs. For PY 2025, the City will also begin planning for affordable housing development using HOME-ARP funding.

## **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 mainly include the lack of adequate financial resources. The largest underserved needs are the shortage of available affordable housing, the substandard conditions of many existing housing units and the shortage of supportive services for homeless persons and those at risk of homelessness. The gap between available affordable housing units and needed affordable housing units is increasing.

The City will attempt to address these underserved needs by creating programs and activities funded with CDBG and HOME and other sources that will create and preserve affordable housing opportunities through homeownership programs, housing development to create new affordable housing units, and housing rehabilitation programs. CDBG and HOME funds will be leveraged where possible to increase the public benefit. The implementation of HOME-ARP funds will continue. HOME-ARP funds will be utilized for homeless supportive services and affordable rental housing development.

To address underserved needs, the majority of CDBG and HOME investments (except for administration and planning activities) for program year 2025, will directly benefit low/mod-income residents. There is some CDBG funds allocated to blight reduction activities which may not benefit low/mod-income residents directly.

### **Actions planned to foster and maintain affordable housing**

According to the 2025 Gap Report, there exists a substantial shortage of available, affordable housing in the United States, especially for renters. The State of Kentucky, through the KY Housing Corporation, also conducted a detailed housing gap analysis which also showed significant affordable housing gaps in the State.

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 to purchase homes throughout the Consortium member cities of Covington, Erlanger, Florence, Independence, Ludlow, Newport, Bellevue, and Dayton.
- **CHDO/other non-profit 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 approximately 70% of the total HOME funds available to CHDO Housing Development and other affordable housing development. The City will solicit proposals from its CHDO partners for this funding. The City also plans to work with other non-CHDO non-profit housing developers to produce affordable housing units.

- Owner-Occupied Housing Rehab: The City offers forgivable loans for low/mod-income homeowners to address urgent home repair needs.

### **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.

### **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, which 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 policymaking, program administration, management of grants/loans and monitoring. The department also manages the annual implementation of all activities funded by the CDBG and HOME Programs.

The City of Covington is a HOME participating jurisdiction and is the lead entity of the Northern Kentucky HOME Consortium. The Consortium includes Covington and the cities of Ludlow, Erlanger, Florence, Independence, 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.

Staff regularly reviews and updates department policies and procedures to ensure compliance with HUD regulations as well as related laws and authorities. New HUD rules and procedures that are sent via CPD notices from HUD are integrated into existing policies and procedures as required.

### **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 utilizes many of these agencies to promote CDBG and HOME Programs. These agencies also refer families for assistance to these City programs. The City will continue to foster and expand these cooperative efforts to further the goals of the Consolidated Plan.

## Program Specific Requirements

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

#### Introduction:

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

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

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

#### Other CDBG Requirements

1. The amount of urgent need activities	0
<TYPE=[text] REPORT_GUID=[A698417B4C924AE0218B42865313DACF] DELETE_TABLE_IF_EMPTY=[YES]>	
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(I)(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 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 if 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. For all HOME funded activities, the City

will utilize the most recent published HUD income limits, HUD affordable homeownership sales price limits, and HOME subsidy limits.

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:

There are no plans to utilize HOME funds for this purpose.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)). <TYPE=[text] REPORT\_GUID=[A0BBB986408D8C25582AC4BE59FA99C5]>

n/a

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

n/a

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

n/a