

Hamilton County, Indiana

2021 Consolidated Annual Performance Evaluation Report (CAPER)

Community Development Block Grant

DRAFT

HAMILTON COUNTY
Noblesville Housing Authority
320 Kings Lane
Noblesville, IN 46060

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The U.S. Department of Housing and Urban Development (HUD) awards Community Development Block Grant (CDBG) funds communities across the US. Hamilton County received an allocation of \$1,108,355 in CDBG funds for the 2021 program year (PY21). In order to receive CDBG funding, Hamilton County must prepare a five-year comprehensive plan and an annual action plan. The annual action plan describes how funding will be spent to meet the goals and strategies developed in the five-year comprehensive plan. To achieve these goals Hamilton County partners with a variety of organizations working towards specific goals. This year-end report, or CAPER, will report the progress made during the second year of the 2019-2023 Consolidated Plan.

The Program Year 2021 Consolidated Annual Performance and Evaluation Report (CAPER) describes the activities and outcomes completed between October 1, 2020 and September 30, 2021 under the Hamilton County, Indiana's Community Development Block Grant (CDBG) program. This CAPER reports outputs for Hamilton County's 2021 - 3rd year of the Five Year Regional Consolidated Plan 2019-2023. The Consolidated Plan was developed with the Hamilton County Board of Commissioners to identify county goals and city jurisdiction actions to be sought toward those goals.

The goals of the Hamilton County CDBG program), in accordance with the regulations prescribed by the U.S. Department of Housing and Urban Development, are to achieve the following outcomes for low and moderate income (LMI) Households:

1. Expand the supply of safe, decent affordable housing.
2. Support programs that help the most vulnerable households achieve self-sufficiency.
3. Invest in public facility and public infrastructure needs of low-income neighborhoods.
4. Improve institutional structure and coordination among providers across the county.
5. Work with city and county officials to provide information on fair housing and zoning. Staff will continue to review and monitor funding agreements with subrecipients to include disclaimer that all subrecipients will affirmatively further fair housing.

In addition, the following federal criteria apply to all activities:

- Meet a goal of the 2019 - 2023 Consolidated Plan: Demonstrate a significance of need
- Serve an eligible area within Hamilton County
- Project or program is eligible under HUD rules
- Create a visual impact in the neighborhood, particularly if an infrastructure project
- Benefits persons at-risk of homelessness or who are homeless
- Benefits a special needs population

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals. (Needs to be Updated for PY 2021)

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration and Planning	Administration and Planning	CDBG: \$218,452	Other	Other	1	1	100.00%	1	1	100.00%
Affordable Housing	Affordable Housing	CDBG: \$0	Homeowner Housing Added	Household Housing Unit	0	0		0	0	0%
Affordable Housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	16	8	50.00%	0	0	50
Homeless Assistance	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	137		675	137	20.30%
Homeless Assistance	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	3		0	3	

Homeless Assistance	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	
Homeless Assistance	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	50	0	0.00%			
Public Infrastructure and Facility Improvements	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1010	31858	3,154.26%	1810	18911	1,044.81%
Public Infrastructure and Facility Improvements	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	20	0	0.00%			
Public Services	Non-Housing Community Development	CDBG: \$ / CDBG-CV: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		0	0	
Public Services	Non-Housing Community Development	CDBG: \$ / CDBG-CV: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10425	93698	898.78%	2675	76097	2,844.75%
Public Services	Non-Housing Community Development	CDBG: \$ / CDBG-CV: \$	Homelessness Prevention	Persons Assisted	0	1407		0	998	

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Priority objectives are identified in the Hamilton County Consolidated Plan (2019-2023) which is used yearly for decision-making process. Project proposals presented to the County are evaluated based on the objectives outlined in the Consolidated Plan. The County selects activities using a scoring matrix that gives priority to projects that address one of the five-year goals.

During the 2021 program year Hamilton County's actions included:

1. Expand the supply of safe, decent affordable housing.

CDBG funding was awarded to Hamilton County Area Neighborhood Development, Inc. (HAND, Inc.) for the following two affordable housing activities:

Cumberland Cottages - Fishers: The project will construct 11 rental units at 13995 Cumberland Road, Fishers, IN. Six of the residences will be affordable to residents earning no more than 60% of the Area Median Income.

Plum Prairie – Noblesville: The project will rehab three historic "Worker" homes on Pleasant Street in Noblesville, IN to provide four rental units of safe, decent housing for households earning up to 60% of the Area Median Income.

In Program Year 2021 the Noblesville Housing Authority commissioned a study using CDBG funds on behalf of the Hamilton County Housing Collaborative, a coalition of 50-plus individuals representing dozens of organizations working to address the communities housing needs. As a group, the Collaborative believes that housing should be attainable for those who want to call Hamilton County home-during every stage of their lives-to uphold the economic well-being of Hamilton County. For that to be possible the county needs a continuum of housing products and prices.

The study document can be found on their web-site at: www.handincorporated.org.

2. Support programs that help the most vulnerable households achieve self-sufficiency.

Funded public service programs (15% of CDBG funds) assisting homeless families, elderly, abused spouses with programs and services, meals, housing, and counseling.

3. Invest in public facility and public infrastructure needs of low-income neighborhoods.

CDBG funded public infrastructure needs in neighborhoods in Fishers and Noblesville, IN. These projects provided accessible sidewalks and curb cuts in Fishers and improved and safe sidewalks in LMI neighborhoods in Noblesville.

4. Improve institutional structure and coordination among providers across the county.

Through administrative efforts and partnerships in the community, the Noblesville Housing Authority (NHA), which administers the CDBG program, works to increase coordination across Hamilton County, with the intended outcome of improving services for low-income households. With the COVID-19 pandemic, more Hamilton County organizations have come together to discuss the needs of the most vulnerable residents in the community and how best to respond to those needs. These coalitions are the Hamilton County Housing Collaborative and the Community Organization Active in Disaster. New types of organizations participating include the local tourism association, youth specific organizations,

private businesses, emergency management, Veterans Affairs, and other civic leaders.

Additionally, the NHA continues to work with the Hamilton County Commissioners to improve coordination of efforts regarding the planning and use of county discretionary funds relative to the CDBG program.

5. Work with city and county officials to provide information on fair housing and zoning. Staff will continue to review and monitor funding agreements with subrecipients to include disclaimer that all subrecipients will affirmatively further fair housing.

NHA staff has attended a Fair Housing training on April 19, 2022 hosted by the Indiana Civil Right Commission and attended the Fair Housing summit on April 27, 2022 hosted by the City of Fort Wayne. NHA also hosted a fair housing training for municipal governments on July 22, 2022.

CR-10 - Racial and Ethnic composition of families assisted (needs updating)

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG
White	46,890
Black or African American	18,655
Asian	4,322
American Indian or American Native	121
Native Hawaiian or Other Pacific Islander	34
Total	70,022
Hispanic	29,492
Not Hispanic	47,592

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative (update with 2021 numbers)

A total of 77,084 persons were assisted with CDBG and CDBG-CV funds during program year 2021. Numbers that are not included in the above table include: Black/African American & White (4,015 persons); Other Multi-racial (3,040 persons); American Indian/Alaskan Native & White (10 persons); Asian & White (23 persons); and American Indian/Alaskan Native & Black/African American (4 persons).

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,108,355	1,577,313

Table 3 - Resources Made Available

Narrative

Activities carried out to meet priorities from the Consolidated Plan and the PY2021 Action Plan were funded from CDBG and CDBG-CV funds. These funds were targeted to meet the greatest needs, and expenditures were directly related to programs that supported the County's Consolidated Plan.

At the end of PY2019 and in PY2020, the County received allocations of the CDBG-CV funds from the CARES Act. The County allocated those funds towards social services to assist low-mode income households impacted by the COVID 19 pandemic as well as affordable housing projects.

Hamilton County received \$1,108,355 in fiscal year 2021 in addition to any funding remaining from previous funding years. During the PY21 fiscal year, Hamilton County expended \$1,577,313. All recipients of CDBG funding have requirements dictating the rate at which the funds should be spent. The requirement states each recipient shall have no more than 1.5 times its annual allocation 60 days prior to the close of the fiscal year. Currently, Hamilton County is within timeliness standards. However, the county will continue to encourage and prioritize projects with achievable outcomes that can be completed in a timely manner.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City of Carmel	11	25	Auman Newark storm sewer improvements
City of Fishers	10	13	ADA sidewalk improvements
City of Noblesville	7	0	Sidewalk improvements
City of Westfield	5	0	
County wide	67	62	Public service activities including CDBG-CV activities and Storm Water Improvements in county
Eligible Township Census Tracts			

Table 4 – Identify the geographic distribution and location of investments

Narrative

Hamilton County does not have a specific target area; funds were used county-wide. The County provided programs and services identified in its Consolidated Plan and other local plans to households with the greatest need. Therefore, most activities served eligible low-income households on a countywide basis and these applicants applied for assistance on a program-by-program basis. Physical activities, including housing and neighborhood improvements, are generally provided within Census Block Group Areas that have the greatest concentrations of low-income households.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

Hamilton County encourages efforts by Carmel, Fishers, Noblesville and Westfield to leverage federal investments as part of public infrastructure projects in their communities. During the 2021 fiscal year no additional funding was identified. The Hamilton County CDBG program did not utilize any public owned land or property to address a need identified in the Consolidated Plan.

CR-20 - Affordable Housing 91.520(b) (Update with 2021 data)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	11	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	11	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
Total	0	0

Table 6 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The NHA utilizes CDBG dollars primarily to preserve affordable housing through the rehabilitation of existing units and to create new affordable housing, particularly for LMI residents. PY2021 funds were allocated for affordable housing projects but these projects are still in the process of being completed so no housing units were completed in 2021.

Discuss how these outcomes will impact future annual action plans.

Through discussions with the Hamilton County Commissioners and county housing stakeholders, more CDBG funds will be allocated for affordable housing projects that will be identified by the Hamilton County Housing Coalition as outlined in their study which was published May, 2021.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	0	0
Moderate-income	0	0
Total	0	0

Table 7 – Number of Households Served

Narrative Information

PY2021 funds were allocated for affordable housing projects but these projects are still in the process of being completed so no housing units were completed in 2021.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

Hamilton County funded Family Promise in PY2021, an organization that serves homeless individuals. Family Promise is a nationwide network of affiliates that offer prevention services, crisis housing and sheltered, case management and housing stabilization programs to families who are experiencing homelessness and at risk of homelessness. In PY2021, Family Promise (activity 372) served 133 individuals/families who were either experiencing homelessness or at-risk of homelessness.

Additionally, CDBG-CV funds were used to assist near homeless or homeless families in Hamilton County. The Good Samaritan Network received CDBG-CV funds (activity 371) and were able to assist 49 homeless persons with temporary housing using \$34,000 in CDBG-CV funding.

Addressing the emergency shelter and transitional housing needs of homeless persons

As stated above, CDBG funded two programs that provided emergency shelter for homeless persons. Family Promise and Good Samaritan Network assisted a total of 182 homeless individuals with temporary shelter.

Prevail, Inc. (activity 373) serves the Hamilton County community as an advocate for victims of crime and abuse. Case managers, or advocates, help victims develop a safety plan, empower victims and work with the entire family to begin a new start to life after trauma. In PY2021, Prevail assisted 361 individual victims of violence with supports and services.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

In PY 2021, Hamilton County awarded \$34,000 of CDBG-CV funds to the Good Samaritan Network and \$58,500 of CDBG funds to Family Promise of Hamilton County to help with homelessness prevention. The Good Samaritan Network offers assistance with temporary and transitional shelter to homeless individuals in Hamilton County. The program coordinates with township trustees to find families and households needing this service. In 2021, Good Samaritan Network provided temporary shelter to 49 individuals using CDBG funds.

Family Promise of Hamilton County works with homeless families to assist with housing needs as well as helping the family develop the tools and skills needed to avoid a homeless situation in the future. During PY2021 Family Promise provided services to 133 individuals.

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

Hamilton County is part of Region 8 in the State of Indiana Continuum of Care, made up of four counties. Region 8 is advocating for more affordable housing development in Hamilton County. Many stakeholders continue to state the greatest need of low-income individuals is the development of more affordable housing for extremely low-income households.

Family Promise of Hamilton County provides assistance to homeless or near homeless families through the provision of financial assistance, counseling and training to help homeless children and their families regain their housing and independence.

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CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The Noblesville Housing Authority (NHA) is the public housing agency serving Hamilton County. NHA does not own or manage any public housing units. NHA only offers the Housing Choice Voucher (HCV) program Section 8 vouchers to low-income households. The Housing Choice Voucher program offers subsidy to a household to allow them to rent any residential unit in the local housing authorities' jurisdiction. The household will pay approximately 30 percent of their monthly adjusted income towards monthly housing costs and the Housing Choice Voucher covers the remaining cost.

IHCDA also has a voucher program serving Hamilton County with a total of ____ households receiving assistance. Households receiving assistance from the IHCDA program do not need to transfer into the NHA program in order to receive assistance in the Hamilton County jurisdiction. The cooperative agreement between the NHA and IHCDA has enabled more households to benefit from the services and amenities in Hamilton County.

The most immediate need for NHA is finding additional funding and Housing Choice Vouchers to provide voucher assistance to Hamilton County residents in need. NHA has an Annual Contribution Contract (ACC) with HUD for **203** Housing Choice Vouchers (HCV) monthly. Turnover of vouchers is slow as most households do not "graduate" from needing a subsidy. Demand for accessible one-bedroom housing units is the greatest need in the community.

To address the increased rent amounts owners are charging in September 2022, Noblesville Housing Authority adopted the Small Area Fair Market Rent payment standards, and is using the maximum 110% of the published Fair Market Rent amounts. This change has proven to be a great benefit to our tenants and also to the participating landlords. Demand for new vouchers has continued to increase with the cost burden of housing in Hamilton County increasing for many families. The waiting list last opened from August 31, 2022 to September 9, 2022. During the time the waiting list was open 2,290 households submitted pre applications to be added to the waiting list. Noblesville Housing Authority selected 200 households to be added to the waiting list based upon local preference and lottery. There are currently 257 households on NHA's waiting list.

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

The Noblesville Housing Authority does not own or manage housing units and only administers a voucher program. The voucher program is a basic rental assistance program. Section 8 vouchers, from the U.S. Department of Housing and Urban Development (HUD) allow households to access housing that would not be affordable to them. The household pays approximately 30 percent of their adjusted monthly income and the voucher pays the remainder of the rent owed to the landlord.

NHA does not currently offer homeownership with its program to voucher holders; however, the agency would consider this approach.

Actions taken to provide assistance to troubled PHAs

The Noblesville Housing Authority does not have a troubled status. Since the Section 8 Management Assessment Program (SEMAP) began in 1998, Noblesville Housing Authority has consistently been rated a High performing housing authority.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

While barriers to affordable housing can come from anywhere, the U.S. Department of Housing and Urban Development (HUD) recognizes a few universal barriers. Local and state regulations on zoning and building are the most recognized barriers to affordable housing. With increased regulation comes an increased cost to build housing that meets all regulations. Hamilton County created a new Analysis of Impediments to Fair Housing in Fiscal Year 2019. The document found the following impediments:

- Lack of affordable housing affects housing choice and may adversely affect the protected classes.
- Knowledge of fair housing laws and where to report vary in the community.
- Institutional and regional coordination of enforcement and advocacy needs to improve.

Additionally, the AI discussed other barriers that prevent, or increase the challenge of affordable housing development. The barriers include:

- High costs of property acquisition near amenities in the more developed communities of Hamilton County, such as Carmel, Fishers, Noblesville and Westfield
- Overcoming challenges developing affordable housing, subsidizing projects large enough to serve the largest populations with cost burden, households earning 0-30 percent of the area median income
- The marketability of affordable housing and increasing support from local civic leaders and the community for this type of development
- The lack of transportation where creation of affordable housing development is less of a financial challenge

Large apartment complexes with corporate ownership represent nearly all rental housing stock, requiring corporate approval of rental applications will often over-ride local management's ability to accept low-income renters with challenges such as short employment history and credit history.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Hamilton County has set goals to develop rental housing for underserved needs households in the community, including extremely low-income households, senior households, or recently homeless households. HAND received CDBG funds from Hamilton County and HOME funds from Indiana Housing and Community Development Authority to construct 11 affordable rental units in Fishers, and construction is currently underway. In October 2021, In November 2019, IHEDA announced a funding commitment for their "Moving Forward" program to Old Town Companies and Merchants Affordable Housing Corp. for a 168-unit mixed income housing development (North End) that will incorporate accessible design, adaptive technology, and smart home technology. Plans include 40 one-bedroom units for very-low-income individuals with Intellectual/Developmental Disabilities (IDD). Another affordable housing development that opened in fall of 2021 is SouthPointe Village in Fishers. SouthPointe Village includes 62 1- and 2-bedroom units, with 13 of them set aside for residents who are intellectually or developmentally disabled.

In 2021 the Noblesville Housing Authority commissioned a study on behalf of the Hamilton County Housing

Collaborative, a coalition of 50-plus individuals representing dozens of organizations working to address the communities housing needs. As a group, the Collaborative believes that housing should be attainable for those who want to call Hamilton County home-during every stage of their lives-to uphold the economic well-being of Hamilton County. For that to be possible the county needs a continuum of housing products and prices.

The study includes information about four specific strategies that could help improve the outlook for accomplishing that.

1. Work collaboratively with leadership to prioritize diversity in housing product types and prices (prioritizing households earning up to 120% AMI).
2. Encourage and regulate for lower cost housing options near jobs and services.
3. Explore public-private philanthropic partnerships to expand resources and dollars aimed at removing barriers to attainable housing.
4. Communicate the importance of attainable housing as it relates to the economy today and in the future.

The study was released by HAND, Inc. at their Suburban Housing Conference on May 4, 2022. The full document can be found on their web-site at: www.handincorporated.org.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The Hamilton County Health Department recommends that children six (6) years old and under be screened for lead, particularly those children living in, regularly visiting or attending a child care facility built before 1978 should be tested. The local health department also provides guidance to address any concerns parents or guardians might have as well as guidance for renovating and clean up lead-based paint hazards.

Any households with children who test high for lead paint blood levels may be referred to the Noblesville Housing Authority or HAND. Funding from HAND's owner-occupied assistance program may resolve lead-based paint hazards found in the home. Any work completed was in compliance with the Environmental Protection Agency's lead-based paint rules and regulations.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

In 2014, Hamilton County adopted a new anti-poverty policy. This strategy is crucial for demonstrating the Noblesville Housing Authority's commitment to tackling poverty. The Noblesville Housing Authority, in partnership with the social service and housing providers in the community, will strive for the goals and strategies below to help households stay out of poverty or become self-sufficient and elevate themselves from living in poverty:

- Promote economic empowerment by supporting facilities, services and activities aimed at developing the self-sufficiency for all low to moderate-income residents. Programs and activities to be supported over the next year include case management services, health services, food pantries, child care and transportation.
- Provide economic development opportunities to low to moderate-income families. Programs and activities to be funded over the next year include job training and placement and promotion of Section 3 opportunities.
- Provide affordable housing opportunities to low and moderate-income households – specifically identifying rental housing projects that are affordable to households earning incomes below 30 percent of the area median income.
- Continue to work with local agencies to identify barriers and issues related to poverty and support programs that will help low to moderate-income households overcome those barriers.

In 2021 Hamilton County funded a variety of social service projects to assist low-income families and individuals, many who live below the poverty line. Hamilton County funded programs such as the Shepherd Center, Meals on Wheels and Prevail. Of those served by these agencies, most of the individuals earned income less than 30 percent of the median income. Additionally, CDBG-CV funding assisted many Hamilton County residents avoid homelessness temporary shelter assistance.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The 2019-2023 Action Plan stated that the institutional structure currently used to develop affordable housing may face organizational and other non-regulatory barriers to affordable housing development. Consultations with community leaders and stakeholders suggested there are barriers that the hard data may not provide. These include barriers that prevent or increase the challenge of affordable housing development. The barriers shared by those leaders and stakeholders include:

- High costs of property acquisition near amenities in the more developed communities of Hamilton County, such as Carmel, Fishers, Noblesville and Westfield.
- Overcoming challenges developing affordable housing, subsidizing projects large enough to serve the largest populations with cost burden, households earning 0-30 percent of the area median income.
- The marketability of affordable housing and increasing support from local civic leaders and the community for this type of development.
- The lack of transportation where creation of affordable housing development is less of a financial challenge.

Large apartment complexes with corporate ownership represent nearly all rental housing stock, requiring corporate approval of rental applications will often over-ride local management's ability to accept low-income renters with challenges such as short employment history and credit history.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The Good Samaritan Network (GSN) is the primary way to connect all service providers throughout Hamilton County. The network includes a variety of providers, from large/corporate health providers to smaller, faith-based food pantries. The Network will continue its efforts to build capacity and coordinate service provisions across the county in the coming year. This relationship has proven especially important as the county has been dealing with the COVID 19 crisis as the GSN has helped facilitate communication and coordination of various CDBG-CV activities.

Hamilton County and the Noblesville Housing Authority want to support and expand the efforts of this organization to not only build up the capacity of its members, but to also connect the members to local housing providers and the Region 8 Planning Council for the Indiana Continuum of Care. By connecting the three different organizations, planning efforts will be more streamlined and projects developed from those efforts will go more to address the households and individuals with the most need.

Using both CDBG and CDBG-CV, the county worked with both not-for-profit and for-profit developers to develop new affordable housing in Hamilton County.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

Hamilton County created a new Analysis of Impediments to Fair Housing in 2019. The new analysis confirmed the greatest impediment to fair housing is the lack of affordable housing in Hamilton County. The document found the following impediments:

- Lack of affordable housing affects housing choice and may adversely affect the protected classes.
- Knowledge of fair housing laws and where to report vary in the community.
- Institutional and regional coordination of enforcement and advocacy needs to improve.

Hamilton County will use partnerships with State Government, local non-profit housing providers, local public service providers or community development advocacy groups to go beyond the steps listed in this plan to promote fair housing. Hamilton County will support other initiatives by the State of Indiana, the City of Anderson and the City of Indianapolis, all neighboring jurisdictions with their own Analysis of Impediments to Fair Housing, to promote fair housing. Such initiatives may include education programs related to fair housing, homeownership training or landlord/tenant legal services.

Following the execution of the Voluntary Compliance Agreement the Noblesville Housing Authority began reaching out to elected officials, community stakeholders, and area non-profits with a vested interest in affordable housing and fair housing in Hamilton County.

As discussed previously, on January 8, 2019 the initial meeting of the Hamilton County- City of Noblesville Affordable Housing Working Group met at the Noblesville City Hall. Since this first meeting several additional groups have been formed to address issues and develop solutions to for the affordable housing crisis in Hamilton County. As a result, the city of Noblesville has significantly strengthened its oversight and review of ordinances and projects to ensure that all ordinances and housing projects brought to the city are reviewed for and examined for barriers or impediments to the development and preservation of affordable housing. NHA continues to work with the Noblesville Diversity Coalition to develop an affordable housing outreach and education plan for Noblesville.

The City of Noblesville is currently completing a housing analysis that updates the study completed in 2016. They are also working with a variety of not for profit and for-profit developers to develop over 300 units of affordable housing.

CR-40 - Monitoring 91.220 and 91.230

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

Monitoring assures that recipients of federal funds are in compliance with local objectives and federal program requirements. The intent of the Noblesville Housing Authority is to work cooperatively with contractors, grantees and sub-recipients in the use of federal funds as best as possible and within reasonable time constraints.

Initial Review of Project Eligibility

1. Requests for funding must be supported with an application to be reviewed for allocation recommendation. Applications include specific information regarding design of project, cost of project and beneficiaries.
2. Each activity must be eligible under related program rules and must meet one of the three national objectives.
3. An activity must be consistent with local goals and objectives as expressed in adopted policies and/or established plans and must comply with related program regulations.
4. Successfully funded applicants are required to sign a funding agreement outlining all of the requirements, regulations and standards.

Ongoing Review of Project Compliance

1. On-site monitoring will be conducted as may be deemed necessary and reasonable by the Noblesville Housing Authority. Desk reviews and off-site monitoring will be an ongoing activity.
2. Claims for payment are filed, with appropriate documentation, with the program manager. The program manager reviews the claim and approves it for payment.
3. Quarterly, monthly, and/or annual reports on project and activity status is required of all sub-recipients.
4. The program manager will also monitor for beneficiary compliance.
5. The Noblesville Housing Authority (NHA) programs generally do not include program income to the sub-recipient/contractor.

Follow-up and Enforcement

1. Compliance concerns are addressed at all phases of an activity, as soon as the project manager is aware of the issue. Technical assistance is provided as necessary to maintain compliance.
2. Annual reviews of sub-recipient activities are conducted by the project manager, using a checklist of areas to be reviewed.
3. Subrecipients may be required to file a Certified Public Accountant (CPA) annual report of subrecipient's financial stability and federally funded project expenditures. Records shall be maintained for five years after project closeout.
4. Enforcement of activities not in compliance shall follow Part 85.43 with the right of appeal, as well as termination of a contract/agreement.

Hamilton County encourages the use of minority (MBE), women (WBE) and veteran (VBE) owned businesses for each of its programs.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The County implemented its Citizen Participation Plan in efforts to provide the community with reasonable notice and opportunity to comment on performance reports. Due to the COVID-19 pandemic, the County had to conduct its public input process in a virtual format, with Zoom meetings and accepting comments through an email. In Program Year 2021, in-person meetings have resumed.

This document, the PY2021 Consolidated Annual Performance and Evaluation Report, will be available for a fifteen-day comment period, December 12, 2022 until December 27, 2022. Hamilton County received the following comments during the fifteen-day comment period: _____

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

The goal of reaching the most vulnerable in the community and across Hamilton County is still a priority of the Hamilton County Commissioners. Additionally, as a result of previous timeliness issues, NHA continues to work closely with local officials as well as their housing and social service partners to ensure that activities are completed in an efficient and timely manner.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

N/A

DRAFT