

## Executive Summary

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

#### 1. Introduction

The U.S. Department of Housing and Urban Development (HUD) awards Community Development Block Grant (CDBG) funds to communities across the United States to address a wide range of housing and community development needs. These CDBG funds are distributed annually among states and local jurisdictions, based on pre-determined criteria identifying “entitlement” communities, with states distributing their funds to non-entitlement localities. In general, entitlement communities are comprised of central cities of Metropolitan Statistical Areas (MSA) with populations of at least 50,000 and urban counties with populations of at least 200,000. Annual CDBG allocations are determined based on a variety of factors including poverty rates, population size, growth rates, and housing conditions such as the age of the housing stock and situations of overcrowding. Hamilton County will receive an estimated allocation of \$1,102,310.00 for year 2023, the final year of the current Consolidated Plan. Additional funds from previous years are also available for reallocation. Those funds include \$8,969 from PY2018, \$211,532 from PY2019, and \$127,594 from PY2020.

As part of the allocation process, every three years each of the eight incorporated communities in Hamilton County must decide if they will be a part of the CDBG Entitlement allocation. Municipalities typically receive their annual allocation based on the percentage of their population to the whole of Hamilton County. As of 2022, the towns of Atlanta, Arcadia, Cicero, and Sheridan have “opted out” of the Hamilton County CDBG program, meaning the CDBG funding from the county, generally, may not be spent within those areas. These municipalities, as well as any other organizations wanting to receive a grant to serve any of these communities, must seek assistance through the Balance of State program via the Indiana Housing and Community Development Authority (IHCDA) or the state’s Office of Community and Rural Affairs (OCRA.) While this can certainly be beneficial to these communities, allowing them to apply for greater amounts of CDBG funding through the State for significant projects such as water and sewer improvements, it does eliminate them from consideration for County CDBG funds.

Hamilton County has a Memorandum of Understanding (MOU) with the Noblesville Housing Authority (NHA) to administer the CDBG program, including oversight of projects selected by the Commissioners of Hamilton County. Programs and projects involving these CDBG Entitlement funds must benefit low to moderate-income households, individuals, or neighborhoods with a high percentage of low to moderate-income residents. Staff at NHA conduct the public input process, gather feedback from stakeholders, conduct the application process, review applications and make recommendations for funding based on eligibility, response to the needs of the community, and alignment with the stated goals of this Action Plan and the Consolidated Plan as a whole. The Commissioners of Hamilton County make the final decision on projects for CDBG funding. While Hamilton County operates on a fiscal year

starting January 1<sup>st</sup>, the program year for Hamilton County runs from October 1st of each year until September 30th. This Action Plan covers the period from October 1, 2023, to September 30, 2024.

## **2. Summarize the objectives and outcomes identified in the Plan**

The top priority of Hamilton County's CDBG program continues to focus on affordable, or "attainable," housing for low to moderate income individuals and households. For Program Year 2023, there will be a focus on funding projects which will specifically provide additional affordable housing units in Hamilton County. Hamilton County does recognize the continued benefits provided by the Public Services which received CDBG funding in the past, however, the need for additional affordable housing units continues to be a significant obstacle which cannot be addressed by the available Public Services in Hamilton County alone. The increasing concern regarding the availability of affordable housing throughout the County is driven by the rapid population growth taking place. Based on data from the American Communities Survey, between 2010 and 2021, Hamilton County experienced a 29 percent increase in population, the highest in the State, with second going to neighboring county, Boone, at 23 percent. This rate of growth has placed a significant burden on the housing market, with production of affordable units lagging even further behind. With this increase has also come a sizeable increase in homelessness and demand for assistance from service providers in the County. Additionally, there are three primary factors which also present obstacles to Hamilton County and participating housing developers in providing additional affordable housing. These factors include perception of need, continued "NIMBYism", and the geographical distribution of those in need.

First, the on-going perception of many residing within, and those outside of, Hamilton County, is there is not a need for "affordable housing." This perception is primarily due to the fact Hamilton County consistently ranks highest in the State for median household income and lowest percentage of population living in poverty. While these statistics are certainly a positive for Hamilton County, they unfortunately add a unique challenge for those advocating for additional affordable housing.

Second, the universal attitude of "NIMBY-ism" continues to be prominent throughout all of Hamilton County. Education on this topic continues to be an aspect which must be part of each individual affordable housing development.

The third and final factor pertains to the geographical distribution of Hamilton County's population. Many of Hamilton County's residents living with low to moderate incomes are often hidden among the more affluent areas in the County. While this does suggest the idea that "mixed income development" tends to take place organically, it does hamper the ability to easily identify at-risk populations. It also lends to the issue of perception, as previously discussed. Geographically, there is also a clear difference in community type between the northern half of the county and the southern half. The northern half consists of the four small rural "towns" of Arcadia, Atlanta, Cicero, and Sheridan, as well as a large portion of unincorporated area, all with a heavy focus on farming. The estimated population of the northern half, including unincorporated areas, is roughly 41,417, just over 11% of the total County

population. The southern half consists of the larger “cities” of Carmel, Fishers, Noblesville, and Westfield, and with that, a great deal more urban development. The estimated population of the southern half is 323,504, just under 89% of the total County population. This disparity in population density creates challenges as well. Solutions which may be suitable for the northern half of the county, likely are not suitable for the southern half, and vice versa.

One additional overriding factor pertains to the general administration of CDBG funds. Hamilton County is atypical of CDBG Entitlement communities throughout the United States. While the whole of the CDBG funds is allocated to the County, each participating community is allocated a portion of the funds to be utilized in their respective communities, with management still handled at the County level. Developing a plan which addresses the needs of each participating community, while also understanding the needs of the county as a whole, can be especially challenging.

Recognizing these challenges, the Noblesville Housing Authority continues to work with vested entities to develop general priorities and goals which offer flexibility in programming for each community and increase coordination among service providers. The priorities for Hamilton County include:

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.

While priority #4 and #5 do not have specific projects or programs which will be directly funded by the County CDBG program, the Noblesville Housing Authority, through administrative efforts and partnerships in the community, will work to increase coordination across Hamilton County with the intended outcome of improving services and access to affordable housing options for low-income households.

### **3. Evaluation of past performance**

Hamilton County, via the Noblesville Housing Authority, has implemented Community Development Block Grant funded projects and programs since 2004, accounting for nineteen program years in total. Hamilton County is currently in its fourth program year, PY22, of the 2019-2023 Consolidated Plan. Hamilton County also received additional funding for PY2020 as part of the CARES Act. In general, the overall benefits of the funding can be demonstrated with the following data:

- Owner-occupied home repair: 3 households served.
- Creation of affordable housing units: 0 households served.
- Provide overnight shelter: 260 homeless individuals served.

- Improve public facilities and infrastructure in each of the four major cities: 43,874 people served.
- Homelessness prevention services: 494 people served.
- Food Distribution: 756 (Harvest Food Bank), 443 (Meals on Wheels), for a total of 1,199 households served.
- Total Public Service Programs: 95,152 people served

#### **4. Summary of Citizen Participation Process and consultation process**

Hamilton County began the 2023 Action Plan process in March 2023, reviewing past documentation and data, as well as analyzing approaches to obtaining citizen and stakeholder input.

Following the Hamilton County Citizen Participation Plan, a notice was published in two local newspapers providing both printed and online sources. Two public meetings, both to take place at the Noblesville Housing Authority office, were scheduled to solicit input:

- June 6, 2023, at 2:00 PM
- July 21, 2023, at 2:00 PM

Additionally, the 2023 Action Plan will be available for public comment from July 11, 2023, to August 9, 2023. During this period, an email will also be sent to all contacts on the Interested Parties List, maintained by the Noblesville Housing Authority.

#### **5. Summary of public comments**

A summary of the comments received from the public will be found in Appendix C when the public comment period has concluded.

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

Hamilton County accepts all comments from the public.

#### **7. Summary**

Hamilton County has a reputation as a fast-growing county with much wealth and a “good place to live, work and raise a family.” Much of the hard data will demonstrate the true need in the county to develop a range of affordable housing. The consultation process will talk about the hidden needs in the community and the need to provide services locally instead of sending them to neighboring communities. As stated previously, the Noblesville Housing Authority will focus Program Year 2023 funding on projects and programs which demonstrate the ability to create, or support the creation of, affordable housing units.

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

<b>Role</b>	<b>Name</b>	<b>Department/Agency</b>
Responsible Entity	HAMILTON COUNTY	Commissioners
CDBG Administrator	Noblesville Housing Authority	CDBG Program

**Table 1 – Responsible Agencies**

**Narrative**

The Noblesville Housing Authority acts on behalf of Hamilton County for the administration of CDBG dollars. The CDBG program is managed by the Community Development Program Manager who reports to the CDBG Administrator and Executive Director of the Noblesville Housing Authority. Together the CDBG staff are responsible for the preparation of the Five-Year Consolidated Plan, Annual Action Plans, and Consolidated Performance Evaluations (CAPERs), all of which are publicly available. The CDBG staff are also responsible for evaluating applications in consultation with the County Commissioners, as well as oversight of the CDBG program.

**Consolidated Plan Public Contact Information**

The Noblesville Housing Authority is the administrator of the CDBG Program. Contact information is:

CDBG Program  
Noblesville Housing Authority  
Attn: Michelle Westermeier, CDBG Program Manager  
320 Kings Lane  
Noblesville, IN 46060  
317-773-5110, ext 5  
michelle@gonha.org

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

The general reputation and unprecedented growth of Hamilton County clearly suggests Hamilton County is a highly desirable place to call home. This reputation and growth also comes with its own set of challenges when it comes to identifying and supporting the under-served populations living with low to moderate incomes. The County will continue to coordinate with and support the many organizations working together to assist Hamilton County residents in need. Additionally, a concerted effort will be placed on the development of affordable housing units, seeking input from local housing developers with a truly vested interest in Hamilton County.

### **Summary of activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies:**

To best coordinate services available, Noblesville Housing Authority has recognized the long-standing efforts of the Good Samaritan Network in bringing many of the service providers, including Township Trustees, together to better serve all of Hamilton County.

The Good Samaritan Network (GSN) was formed in 1995 as a collaborative network of organizations in Hamilton County. The organization had the vision to “position ourselves as an effective organizational structure for the facilitation, collaboration, and coordination of appropriate services to those residents of Hamilton County in need.” From this vision, two primary goals were established. The first, to better serve at-risk and underserved individuals in Hamilton County. Second, to reduce duplication efforts by organizations throughout the county. Over the years, GSN has brought together a comprehensive network of providers, including the Noblesville Housing Authority, private affordable housing providers, nonprofit health agencies, mental health agencies, local housing shelters, and other public service agencies, all working toward the common goal to end homelessness and provide the building blocks for struggling households working towards self-sufficiency. With these two primary goals, GSN utilizes two approaches to serving the community: Direct and Indirect services. Direct Services typically involve programs offered directly through GSN, often involving emergency or crisis intervention, whether for housing or utility assistance, food insecurities, car repairs, medical and prescription assistance, as well as educational opportunities for improving individual independence. GSN’s partnerships with many in the business community also help to off-set the costs of these programs through annual donations. Indirect services are provided to the client as referrals to many of the services providers within Good Samaritan “Network,” with GSN serving as an intermediary organization between the individuals in need and the organizations that provide programs and services that can meet those needs. This network is comprised of governmental and emergency agencies, non-profit social services providing housing and utility assistance, food, clothing, and other household necessities, township trustees, and local churches.

As mentioned previously, GSN also works closely with all nine Township Trustees in Hamilton County. Since 1894, the State of Indiana has required townships to provide “poor relief” to individuals in need. As a result, those in need will typically contact the Township Trustee first. The Township Trustee may provide assistance for basic necessities, if funds are available within the Trustee’s operation. The Trustee may also refer the individual to a host of other agencies or organizations throughout the county for additional assistance, beginning with GSN as they work to coordinate services for the individual or household.

**Coordination with the Continuum of Care and efforts to address the needs of homeless and persons at risk of homelessness:**

The Indiana Balance of State Continuum of Care (CoC) includes ninety-one of the ninety-two counties in the state. These ninety-one counties are divided into sixteen regions, with each region overseen by a regional planning council and chairperson. Hamilton County is part of Region 8, in the Indiana Balance of State CoC, along with Boone, Hendricks, Madison, and Hancock Counties. Aspire Indiana, Inc. has served as the convening entity for Region 8, bringing together many of the service providers in Hamilton County, as well as service providers from the other participating counties. Some of the Hamilton County organizations include Good Samaritan Network, Prevail, Family Promise, HAND, Inc., and the Noblesville Housing Authority. The primary focus of the CoC is to address the needs of the homeless in its designated region. This is done through a two-pronged approach. First, the group works to identify opportunities to provide affordable housing throughout the county. Second, they work to ensure residents in need have access to comprehensive services aimed to develop self-sufficiency for those receiving rental assistance. This will continue to be the focus as the group works to address homelessness in all counties they serve.

**Consultation with the Continuum(s) of Care in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS:**

While Hamilton County does not receive Emergency Solutions Grant funding as an entitlement jurisdiction, individual organizations located in Hamilton County do receive statewide funds through Indiana Housing and Community Development Authority (IHCD). Currently, Aspire receives Emergency Solutions Grant Rapid Rehousing and Homeless Prevention funds to be utilized in the counties they serve. Additionally, Prevail, Inc., a local non-profit working with domestic violence survivors, receives ESG funds to assist their clients. Although both organizations work directly with the State, there is still discussion within the CoC on how those funds continue to be utilized. All recipients of Emergency Solutions Grant funds and Continuum of Care funds must participate in the utilization of a Coordinated Entry System and Homeless Management Information System (HMIS) to track the services and housing assistance provided to households and individuals. Coordinated entry processes help communities prioritize assistance based on vulnerability and severity of service needs, to ensure that people who

need assistance the most can receive it in a timely manner. HMIS can be used to produce an unduplicated count of homeless persons, understand patterns of service use, and measure the effectiveness of homeless programs. Prevail utilizes a similar but separate system to track services and maintain confidentiality of those served.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities:**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	<b>Family Promise of Hamilton County</b>
	<b>Agency/Group/Organization Type</b>	Non-Profit Housing Services: Housing Placement Homeless Prevention
	<b>What section of the Plan was addressed by Consultation?</b>	Affordable Housing Homeless & Other Special Needs Activities Barriers to Affordable Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person interview conducted with organization staff. Gather ideas on approaches to more effectively provide additional affordable housing units, supportive services to better aid in path to self-sufficiency
2	<b>Agency/Group/Organization</b>	<b>Noblesville Housing Authority</b>
	<b>Agency/Group/Organization Type</b>	Public Housing Authority Services – Housing, housing vouchers, fair housing
	<b>What section of the Plan was addressed by Consultation?</b>	Affordable Housing Public Housing Homeless & Other Special Needs Activities Barriers to Affordable Housing Other Actions
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person interview conducted with organization staff.



3	<b>Agency/Group/Organization</b>	<b>Aspire Indiana, Inc.</b>
	<b>Agency/Group/Organization Type</b>	Regional Non-Profit Mental Health organization Services - Persons with Disabilities, Homeless, Mental Health, Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Continuum of Care Affordable Housing Homeless & Other Special Needs Activities
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Virtual meeting with Aspire
4	<b>Agency/Group/Organization</b>	<b>Shepherd's Center of Hamilton County</b>
	<b>Agency/Group/Organization Type</b>	Non-Profit Services – Elderly persons, homeless prevention, other special needs activities
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless & Other Special Needs Activities Other Actions
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person interview conducted with organization staff. Identify the current needs of the population served and options for meeting those needs.
5	<b>Agency/Group/Organization</b>	<b>Meals on Wheels of Hamilton County</b>
	<b>Agency/Group/Organization Type</b>	Non-Profit Services – Elderly and disabled meal delivery
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless and Other Special Needs Activities Barriers to Affordable Housing Other Actions
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person interview conducted with organization staff.
6	<b>Agency/Group/Organization</b>	<b>JANUS Developmental Services, Inc.</b>
	<b>Agency/Group/Organization Type</b>	Non-Profit Services - Persons with Disabilities, Transportation
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless & Other Special Needs Activities Barriers to Affordable Housing Other Actions

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person interview conducted with organization staff.
7	<b>Agency/Group/Organization</b>	<b>PrimeLife Enrichment, Inc.</b>
	<b>Agency/Group/Organization Type</b>	Non-Profit Services - Elderly Persons, Transportation
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless & Other Special Needs Activities Barriers to Affordable Housing Other Actions
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person meeting with organization staff
8	<b>Agency/Group/Organization</b>	<b>Good Samaritan Network</b>
	<b>Agency/Group/Organization Type</b>	Non-Profit Services – homeless intervention/prevention, referrals, food distribution, other emergency assistance
	<b>What section of the Plan was addressed by Consultation?</b>	Affordable Housing Homeless & Other Special Needs Activities Barriers to Affordable Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person interview conducted with organization staff.
9	<b>Agency/Group/Organization</b>	<b>HAND, Inc.</b>
	<b>Agency/Group/Organization Type</b>	Non-Profit Services – Affordable housing, supportive service referrals
	<b>What section of the Plan was addressed by Consultation?</b>	Affordable Housing Barriers to Affordable Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person interview conducted with organization staff.
10	<b>Agency/Group/Organization</b>	<b>Prevail, Inc.</b>
	<b>Agency/Group/Organization Type</b>	Non-Profit Services – domestic Violence Survivors, homeless intervention, supportive services

	<b>What section of the Plan was addressed by Consultation?</b>	Affordable Housing Homeless & Other Special Needs Activities Barriers to Affordable Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person interview conducted with organization staff.
11	<b>Agency/Group/Organization</b>	<b>City of Carmel</b>
	<b>Agency/Group/Organization Type</b>	Municipality
	<b>What section of the Plan was addressed by Consultation?</b>	Investment in public infrastructure Affordable Housing Homeless & Other Special Needs Activities Barriers to Affordable Housing Other Actions
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person interview conducted with staff.
12	<b>Agency/Group/Organization</b>	<b>City of Fishers</b>
	<b>Agency/Group/Organization Type</b>	Municipality
	<b>What section of the Plan was addressed by Consultation?</b>	Investment in public infrastructure Affordable Housing Homeless & Other Special Needs Activities Barriers to Affordable Housing Other Actions
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person interview conducted with staff.
13	<b>Agency/Group/Organization</b>	<b>City of Noblesville</b>
	<b>Agency/Group/Organization Type</b>	Municipality
	<b>What section of the Plan was addressed by Consultation?</b>	Investment in public infrastructure Affordable Housing Homeless & Other Special Needs Activities Barriers to Affordable Housing Other Actions
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person interview conducted with staff.

14	<b>Agency/Group/Organization</b>	<b>City of Westfield</b>
	<b>Agency/Group/Organization Type</b>	Municipality
	<b>What section of the Plan was addressed by Consultation?</b>	Investment in public infrastructure Affordable Housing Homeless & Other Special Needs Activities Barriers to Affordable Housing Other Actions
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person interview conducted with staff.
15	<b>Agency/Group/Organization</b>	<b>Hamilton County</b>
	<b>Agency/Group/Organization Type</b>	County Government
	<b>What section of the Plan was addressed by Consultation?</b>	Affordable Housing Barriers to Affordable Housing Other Actions
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In-person interview conducted with staff.
16	<b>Agency/Group/Organization</b>	<b>Hamilton County Township Trustees</b>
	<b>Agency/Group/Organization Type</b>	Other government – County Township
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless & Other Special Needs Activities Barriers to Affordable Housing, Other Actions
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Online survey conducted to gather information about active services provided and areas of need

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

Hamilton County continues to make efforts to include every type of stakeholder in the consultation process.

**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	Indiana - Balance of State	The goals for the Action Plan mirror the ideas and strategies that have been set by Region 8 of the Indiana Balance of State. Hamilton County will continue to support the Region 8 Planning Council as it works to address homelessness within the County and surrounding counties.
Analysis of Impediment to Fair Housing	Noblesville Housing Authority	The analysis of impediments to fair housing examines housing discrimination and the impact it has on affordable housing development. The goals of the fair housing document are included as part of this document and several initiatives to further fair housing have been included.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative**

While the Region 8 Continuum of Care (CoC) serves multiple counties, the goals and strategies align with the goals for Hamilton County specifically.

In 2021 the Noblesville Housing Authority commissioned a study on behalf of the Hamilton County Housing Collaborative, a coalition of over sixty individuals representing dozens of organizations working to address the community’s housing needs. The Collaborative believes housing should be attainable for those who want to call Hamilton County home, during every stage of their lives. For that to be possible the county needs a continuum of housing products and prices.

The study includes four specific strategies which will assist in achieving this goal:

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 website at: [www.handincorporated.org](http://www.handincorporated.org).

## AP-12 Participation – 91.105, 91.200(c)

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

Hamilton County began the 2023 Action Plan process in early spring 2023. The first public meeting was held on June 9, 2023, at the NHA offices at 320 Kings Lane, Noblesville, Indiana. A second public hearing is to be held on July 21, 2023, to present the 2023 Action Plan. A thirty-day public comment period will run from July 11, 2023, through August 9, 2023. All comments from the public will be incorporated in the final draft of this document.

### 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
1	Public hearing	Non-targeted/broad community	NHA conducted a general public hearing on June 9, 2023. The hearing discussed the CDBG program including goals, priorities and eligible activities.	A summary of public comments is included in Appendix C.	All comments were received.
2	Public Hearing	Non-targeted/broad community	NHA will conduct second public hearing on July 21, 2023, to further discuss CDBG program goals, priorities and eligible activities.	A summary of public comments is included in Appendix C.	All comments were received.

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

Annual CDBG allocations are determined based on a variety of factors including the poverty rates, population size and growth rates, and housing conditions such as the age of the housing stock and other housing problems such as overcrowding. Programs and projects must benefit low to moderate-income households, individuals, or neighborhoods with high percentage of low to moderate-income residents. Hamilton County will receive an estimated allocation of \$1,102,310 for fiscal year 2023. Additional funds are available for reallocation from previous program years. Those funds include \$8,969 from PY2018, \$122,532 from PY2019, and \$127,594 from PY2020. Total funds available for 2023 is \$1,450,405

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				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	1,102,310	0	348,095	1,450,405	1,450,405	Funding will be used for infrastructure development and supporting housing development for extremely low-income, low income and low-moderate income households.

Table 5 - 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.**

Hamilton County does not currently require projects to meet any match requirements. However, through the annual application process, information must be provided regarding additional funding sources. Applications demonstrating a greater percentage of leveraged funds, as well as meeting eligibility requirements, are more likely to be recommended for funding.

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

Hamilton County does not currently own any property which has been identified for future development of affordable housing units. However, over the past year, on-going discussions have taken place regarding the creation of a Community Land Trust for the purpose of securing property throughout Hamilton County which would be available for affordable housing projects.

### **Discussion**

Hamilton County, in partnership with the Housing Collaborative, began researching Community Land Trusts (CLT) and how a CLT could serve as a more effective tool in creating Affordable Housing units throughout the County. The County and Collaborative, along with a third-party consultant, have been working to determine the best structure for the CLT, management of the CLT, as well as what types of parcels would be suitable for acquisition and development. While the County and Collaborative do not anticipate establishing and utilizing a CLT during Program year 2023, the group hopes to have systems in place by Program Year 2024 and the beginning of the next Consolidated Plan covering 2024-2028.



# 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	PY 23 Funding	Goal Outcome Indicator
1	Affordable Housing	2019	2023	Affordable Housing	County wide	Affordable Housing	CDBG: \$440,924 PY23 \$127,594 PY20 \$211,532 PY19 \$8,969 PY18	Rental units constructed: 20 Household Housing Unit
2	Public Infrastructure and Facility Improvements	2019	2023	Non-Homeless Special Needs Non-Housing Community Development	City of Carmel	Public Infrastructure and Facility Improvement	CDBG: \$125,751	Infrastructure Activity addressing stormwater and drainage issues; Benefit: 100 Persons Assisted
3	Public Infrastructure and Facility Improvements	2019	2023	Non-Homeless Special Needs Non-Housing Community Development	City of Fishers	Public Infrastructure and Facility Improvement	CDBG: \$120,195	Infrastructure Activity eliminating identified accessibility barriers; Benefit: 100 Persons Assisted
4	Public Infrastructure and Facility Improvements	2019	2023	Non-Homeless Special Needs Non-Housing Community Development	City of Noblesville	Public Infrastructure and Facility Improvement	CDBG: \$115,874	Infrastructure Activity focusing on the replacement of deteriorated sidewalks in eligible neighborhoods; Benefit: 100 Persons Assisted
5	Public Infrastructure and Facility Improvements	2019	2023	Non-Homeless Special Needs Non-Housing Community Development	City of Westfield	Public Infrastructure and Facility Improvement	CDBG: \$79,101	Infrastructure Activity focusing on improving pedestrian access to local amenities; Benefit: 100 Persons Assisted
6	Administration and Planning	2019	2023	Administration and Planning	County wide	Administration and Planning	CDBG: \$220,462	Other: 1 Other

**Table 6 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing
	<b>Goal Description</b>	Development of affordable housing units for households earning incomes less than 80 percent of the area median income.
2	<b>Goal Name</b>	Public Infrastructure and Facility Improvements - Carmel
	<b>Goal Description</b>	Infrastructure improvements: On-going work addressing stormwater and drainage issues in older areas of the community, also consisting of a higher percentage of low- and moderate-income individuals. The number of persons assisted to be determined depending on the projects and locations of those selected projects.
3	<b>Goal Name</b>	Public Infrastructure and Facility Improvements - Fishers
	<b>Goal Description</b>	Infrastructure improvements: On-going work addressing accessibility barriers through the installation of ADA ramps in existing neighborhoods. The number of persons assisted to be determined depending on the projects and locations of those selected projects.
4	<b>Goal Name</b>	Public Infrastructure and Facility Improvements - Noblesville
	<b>Goal Description</b>	Infrastructure improvements: On-going work addressing stormwater and drainage issues in older areas of the community, also consisting of a higher percentage of low- and moderate-income individuals. The number of persons assisted to be determined depending on the projects and locations of those selected projects.
5	<b>Goal Name</b>	Public Infrastructure and Facility Improvements - Westfield
	<b>Goal Description</b>	Infrastructure improvements: On-going work addressing pedestrian access and movement in areas of the community, also consisting of a higher percentage of low- and moderate-income individuals. The number of persons assisted to be determined depending on the projects and locations of those selected projects.
6	<b>Goal Name</b>	Administration and Planning
	<b>Goal Description</b>	Overall administration of the CDBG program and affirmatively furthering fair housing.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

Adhering to the CDBG program’s national objectives, as well as the recent determination by the Hamilton County Commissioners to focus on the creation of affordable housing units, priority will be given to projects that address the rapidly increasing need for affordable housing units.

Noblesville Housing Authority staff reviewed applications received by June 20, 2023, requesting PY23 funding, and presented its recommendations, along with complete copies of each application for reference, to the Hamilton County Commissioners on Monday, July 10, 2023. The Commissioners made the final determination on project awards during their regular meeting. The following projects have been selected for 2023 program year.

#### Projects

#	Project Name
1	Affordable Housing
2	Carmel-Eligible Infrastructure Project
3	Fishers-Eligible Infrastructure Project
4	Noblesville-Eligible Infrastructure Project
5	Westfield-Eligible Infrastructure Project
6	Administration and Fair Housing

Table 7 - Project Information

#### Explanation of allocation priorities and any obstacles to addressing underserved needs:

With the challenges described earlier, Hamilton County has developed general goals to offer flexibility in programming for all participating communities and increase the coordination among service providers. Under each goal is a list of strategies that will meet needs of the community. While some strategies may not be applicable to those in the northern communities, others will meet their needs and vice versa for those communities to the south. Projects that meet one of the goals may apply for funding to the Noblesville Housing Authority request for proposal process each year.

Overall, the primary need for individuals and families in Hamilton County is finding and maintaining affordable housing. For low- and moderate-income households, the continued increase in housing costs is contributing to a corresponding rise economic insecurity, causing many households to be just one

emergency away from being at-risk of homelessness.

With limited resources, projects in 2023 will be selected based on several factors:

- Meeting the stated goal of providing or supporting the provision of affordable housing units
- Leveraging of other resources to maximize impact
- Capacity to provide the project and utilize federal funds.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	<b>Affordable Housing Activity</b>
	<b>Target Area</b>	County wide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$440,924 PY23 \$127,594 PY20 \$211,532 PY19 \$8,969 PY18
	<b>Description</b>	CDBG funds will be used for the reimbursement for the cost of land acquisition for the future development of affordable housing for low- and moderate-income individuals.
	<b>Target Date</b>	9/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Up to 20 families/households will benefit.
	<b>Location Description</b>	Yet to be determined.
	<b>Planned Activities</b>	Funding available to complete affordable housing for future projects yet to be determined. Hamilton County is actively looking for affordable housing projects. Funds could be used for infrastructure for a development, land acquisition or renovation of affordable housing.
2	<b>Project Name</b>	<b>Carmel-Eligible Infrastructure Project</b>
	<b>Target Area</b>	City of Carmel
	<b>Goals Supported</b>	Public Infrastructure and Facility Improvements
	<b>Needs Addressed</b>	Public Infrastructure and Facility Improvement
	<b>Funding</b>	CDBG: \$125,751
	<b>Description</b>	The City of Carmel will use CDBG funds to fund eligible infrastructure activities. A final location for the project is yet to be determined. The city will use CDBG funding to provide infrastructure improvements in eligible census tracts; the specific project(s) have yet to be determined. Proposed activities shall be eligible under 24 CFR 570.201 (c) and will have a low to moderate income area benefit.

	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will benefit approximately 100 Hamilton County residents.
	<b>Location Description</b>	All work will take place in an eligible Census Tract yet to be determined.
	<b>Planned Activities</b>	The City of Carmel will use CDBG funds toward an eligible infrastructure project in an eligible area.
<b>3</b>	<b>Project Name</b>	<b>Fishers-Eligible Infrastructure Project</b>
	<b>Target Area</b>	City of Fishers
	<b>Goals Supported</b>	Public Infrastructure and Facility Improvements
	<b>Needs Addressed</b>	Public Infrastructure and Facility Improvement
	<b>Funding</b>	CDBG: \$120,195.88
	<b>Description</b>	The City of Fishers will use CDBG funds to fund eligible infrastructure activities. A final location for the project is yet to be determined. The city will use CDBG funding to provide infrastructure improvements in eligible census tracts; the specific project(s) have yet to be determined. Proposed activities shall be eligible under 24 CFR 570.201 (c) and will have a low to moderate income area benefit.
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will benefit approximately 100 Hamilton County residents.
	<b>Location Description</b>	All work will take place in an eligible Census Tract yet to be determined.
	<b>Planned Activities</b>	The City of Fishers will use CDBG funds toward an eligible infrastructure project in an eligible area.
<b>4</b>	<b>Project Name</b>	<b>Noblesville-Eligible Infrastructure Project</b>
	<b>Target Area</b>	City of Noblesville
	<b>Goals Supported</b>	Public Infrastructure and Facility Improvements
	<b>Needs Addressed</b>	Public Infrastructure and Facility Improvement
	<b>Funding</b>	CDBG: \$115,874.83

	<b>Description</b>	The City of Noblesville will use CDBG funds to fund eligible infrastructure activities. A final location for the project is yet to be determined. The city will use CDBG funding to provide infrastructure improvements in eligible census tracts; the specific project(s) have yet to be determined. Proposed activities shall be eligible under 24 CFR 570.201 (c) and will have a low to moderate income area benefit.
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will benefit 100 Hamilton County residents.
	<b>Location Description</b>	All work will take place in an eligible Census Tract yet to be determined.
	<b>Planned Activities</b>	The City of Noblesville will use CDBG funds toward an eligible infrastructure project in an eligible area.
5	<b>Project Name</b>	<b>Westfield-Eligible Infrastructure Project</b>
	<b>Target Area</b>	City of Westfield
	<b>Goals Supported</b>	Public Infrastructure and Facility Improvements
	<b>Needs Addressed</b>	Public Infrastructure and Facility Improvement
	<b>Funding</b>	CDBG: \$79,101.77
	<b>Description</b>	The City of Westfield will use CDBG funds to fund eligible infrastructure activities. A final location for the project is yet to be determined. The city will use CDBG funding to provide infrastructure improvements in eligible census tracts; the specific project(s) have yet to be determined. Proposed activities shall be eligible under 24 CFR 570.201 (c) and will have a low to moderate income area benefit.
	<b>Target Date</b>	9/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will benefit approximately 100 Hamilton County residents.
	<b>Location Description</b>	All work will take place in an eligible Census Tract yet to be determined.
	<b>Planned Activities</b>	The City of Westfield will use CDBG funds toward an eligible infrastructure project in an eligible area.
6	<b>Project Name</b>	<b>Administration and Fair Housing</b>
	<b>Target Area</b>	County wide
	<b>Goals Supported</b>	Administration and Planning

<b>Needs Addressed</b>	Administration and Planning
<b>Funding</b>	CDBG: \$220,462.00
<b>Description</b>	The Noblesville Housing Authority will provide Administrative and Fair Housing services for the PY2022 Hamilton County, IN CDBG program. NHA will provide overall program management and oversee all program design and implementation of activities of sub-recipients and contracted services. This project is eligible under 24 CFR Part 570.206 (a).
<b>Target Date</b>	9/30/2024
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
<b>Location Description</b>	Noblesville Housing Authority, 320 Kings Ln, Noblesville, IN 46060
<b>Planned Activities</b>	Noblesville Housing Authority will provide overall program management and oversee all program design and implementation activities of sub-recipients and contracted services. Funding will also be used to fund fair housing promotion and education activities.



## **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.**

Due to the high levels of wealth in Hamilton County, an exception has been granted allowing the county to target funds in areas where at least 37.83 percent of households in an area are moderate-income households, instead of the standard 51 percent. This percentage changes from year to year, but generally holds between 30-33 percent. For 2023, any target area must have 37.83 percent of the population earning 80 percent of the area median income or lower.

Additional geographic factors pertain to the municipalities which choose to opt-in or out of the federal CDBG Entitlement program. As mentioned previously, the larger cities of Carmel, Fishers, Noblesville, and Westfield have opted-in, while the smaller towns of Arcadia, Atlanta, Cicero, and Sheridan, have opted-out. The larger participating cities are all located within the southern half of the county with nearly all the land included within the incorporated boundaries of each of the cities. The smaller rural towns are all located in the northern half of the county. Typically, CDBG funds are not eligible for use within the incorporated limits of these four towns, however, the County can utilize CDBG funds to serve those located in the unincorporated areas of the county. Historically, the exception to this rule has been for projects which create affordable housing units. It has been determined this type of eligible activity benefits households living with low- and moderate-incomes throughout the county as a whole.

#### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
County-wide*	40.0%
City of Fishers	10.9%
City of Carmel	11.4%
City of Noblesville	10.5%
City of Westfield	7.2%

**Table 8 - Geographic Distribution; \*excluding the incorporated areas of Arcadia, Atlanta, Cicero, and Sheridan**

### **Rationale for the priorities for allocating investments geographically**

Geographic distribution is the default method for allocation of funds for the participating communities, establishing that each municipal allocation must be used within the incorporated limits of each community. Within each community, municipalities must ensure projects geographically take place in eligible census tracts or serve a presumed category of beneficiaries. The remaining funds are available for allocation county-wide, including the participating communities, still within eligible census tracts or

serving presumed beneficiaries.

## **Discussion**

Due to the nature of how federal CDBG entitlement funds are allocated for the county, geography plays a significant role. Once funds are allocated to each participating community, and the county as a whole, geography further impacts distribution based on eligible census tracts. Many low- to moderate-income households are dispersed throughout Hamilton County's metropolitan areas or along the fringes of the urban areas, making geographical distribution challenging. For some projects, eligibility must be based upon a presumed beneficiary or by providing affordable housing units. Targeting areas where low to moderate-income individuals reside is important to CDBG funded programs. Projects can indirectly benefit many people, increasing beneficiaries per dollar spent or invested.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

As stated earlier, the primary need for households in Hamilton County is finding and maintaining affordable housing. For low- and moderate-income households, the ongoing rise in housing costs is contributing to rising economic insecurities causing many households to be just one emergency away from being at-risk of homelessness.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	20
Special-Needs	0
Total	20

**Table 9 - 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	20
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	20

**Table 10 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

Hamilton County has set aside remaining funds for affordable housing initiatives in the coming year. HAND, Inc., a local nonprofit Community Housing Development Organization (CHDO), has applied for PY23 funding for acquisition of land to construct additional affordable units. HAND also has two projects underway which received CDBG funds from previous program years. Another local nonprofit, Family Promise of Hamilton County, in partnership with Radiant Communities, received CDBG funds to construct the Townhomes at Stony Creek, a 49-unit affordable housing development located in Noblesville. Additionally, several private housing developments that include units set aside to assist Low to moderate income households are being constructed in Hamilton County. In addition to the stated barriers of Perception of Need, NIMBYism, and Geographical Distribution, the effects of unprecedented inflation over just the past few years has caused construction costs to sky-rocket. Developers are finding it more difficult to access enough funding for affordable housing projects.

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

### **Introduction**

Noblesville Housing Authority (NHA) is the public housing agency for Hamilton County. NHA does not, however, currently own or manage any public housing units. They do administer the Section 8 Housing Choice Vouchers program, a tenant based rental program for low-income households.

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

The most immediate need for NHA is obtaining additional voucher assistance. Noblesville Housing Authority currently administers 203 local vouchers, and 16 vouchers for households who have ported their vouchers from other housing authorities. The other housing authorities continue to hold those vouchers and NHA bills them for the monthly housing assistance payments. The waiting list for vouchers in Hamilton County is currently closed. Turnover of vouchers is slow as most households do not “graduate” from needing a subsidy. Many voucher holders are elderly or disabled, returning their voucher when they cannot live independently or pass away. Given the limited number of vouchers administered and the low turnover among households receiving this rental assistance subsidy, NHA selected only 200 applicants from the applicant pool based on local preferences and a lottery system to add to the waiting list. Preferences include applicants who live or work in Hamilton County (1000 points); applicants live or work in and surrounding county (Boone, Clinton, Hancock, Madison, Marion, or Tipton County, Indiana) (400 points); applicants who’s head or co-head of household is elderly (age 62 or older) (200 points); applicants who’s head or co-head of household is disabled (200 points); and applicants who are veterans or surviving spouses of veterans (50 points). There are currently 193 households on the waiting list including 27 that have at least one household member with a disability, 29 of whom are elderly households, and 44 of whom are families with children. Demand for new vouchers has increased with the still-rising cost burden many families, including the elderly, are facing in Hamilton County

In 2020, NHA was approved for up to 25 additional vouchers, as part of HUD’s Foster Youth to Independence (FYI) voucher program. With these vouchers, the applicants must be at risk of homelessness, be between the ages of 18 and 23, and be referred to NHA through the Indiana Department of Child Services. So far nine participants have been housed through the FYI program, and NHA is actively seeking additional referrals. In 2022, NHA received six additional vouchers from HUD. Additionally, in 2023, NHA was awarded five Stability Vouchers for families at risk of homelessness. There is also the possibility HUD may reallocate vouchers from other housing authorities that have been unable to fully utilize their vouchers. NHA is actively pursuing any and all opportunities to increase their number of vouchers.

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

The Noblesville Housing Authority encourages any of its participants to join the Resident Advisory Board, whose primary function is to provide input on the Housing Authority’s 5-year plans. NHA does not own

or manage any public housing units.

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

The Noblesville Housing Authority is not designated as troubled.

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

### **Introduction**

With the amount of wealth in Hamilton County, homelessness is a hidden and misunderstood issue in the community. It continues to be a common perception that Hamilton County has few to no homeless, which, sadly, is not true. The primary challenge to even documenting this issue is locating those homeless. The Point in Time Count, which is held on a single day in January, is a nation-wide effort to document the number of homeless at one point in time each year. Aspire Indiana, the lead agency of the Region 8 Continuum of Care, is responsible for conducting this count in Hamilton County. The intent is to gather and analyze data to determine growth or decline of the homeless population over time. The PIT count in Hamilton County for 2021, the most recent data available, indicated only one household (three individuals) experiencing homelessness. However, discussions with organizations serving homeless people indicate there were many more homeless individuals and families during 2021 and the trend has continued into 2022 and 2023 due to the on-going lack of affordable housing.

Hamilton County does have one emergency homeless shelter, Third Phase, which serves individuals, predominantly single males. Unfortunately, Third Phase is not structured to also serve families with young children, nor can it address the needs of those leaving a domestic violence situation. Recognizing the need for suitable safe shelter for families, Family Promise of Hamilton County was established in 2017, opening its Day Center serving homeless families in 2019. The lack of a domestic violence shelter in Hamilton County has also been identified as a high priority need among stakeholders and members of the general public. Currently, residents of Hamilton County are served by a shelter in neighboring Anderson, Alternatives of Madison County, Inc. Fortunately, there are now plans in the works to construct a facility within Hamilton County for survivors of domestic violence. Property has been acquired by the county and design ideas are being discussed. In addition to these shelters, there are a series of organizations, including Township Trustees and private organizations, that provide emergency housing and utility assistance.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.**

The Indiana Balance of State Continuum of Care (CoC) is the planning body for initiatives in ending homelessness in the State of Indiana. To do so, this group supports the development and ongoing maintenance of a strategic, comprehensive system to address homelessness. This includes strategies for engaging mainstream partnerships, the provision of shelter, temporary housing, services, and permanent housing. The components of a CoC system are outreach, intake, and assessment to identify an individual's or family's service and housing needs, and to link them to appropriate housing and/or service resources such as emergency shelter and safe, decent alternatives to the streets; transitional housing with supportive services; and permanent supportive housing and permanent housing. The goal is to ensure that all residents of the State of Indiana are able to access and maintain permanent

housing.

The Indiana Balance of State Continuum of Care includes 91 of the 92 counties in the state. These 91 counties are divided into 16 regions and each region is overseen by a regional planning council and chairperson. Hamilton County is part of Region 8 in the Indiana Balance of State CoC along with Boone, Hendricks, Madison, and Hancock Counties. The Region 8 CoC works with a variety of providers in Hamilton County including, but not limited to Good Samaritan Network, Prevail, Township Trustee offices, Third Phase, Family Promise, Aspire Indiana, Community Corrections, and the Noblesville Housing Authority. The CoC will continue to work with local service providers to address the needs of the homeless in the county.

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

As mentioned previously, Hamilton County and Prevail are working together to develop an emergency shelter within Hamilton County for survivors of domestic violence. Also, Family Promise has secured master leases for rental units they make available to families at risk of homelessness. Upon completion of Family Promises Townhomes at Stony Creek, 49 more units will be available for the families they serve, helping them to transition from near homelessness to self-sufficiency.

### **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**

When looking to better facilitate an individual's transition from homelessness to self-sufficiency, one option is the creation of Permanent Supportive Housing. This approach is very intentional with its structure, providing housing as well as all the supportive services needed to support that individual's work towards self-sufficiency. This type of housing requires additional in-depth training for the development and management staff. Currently there are no permanent supportive housing developments within Hamilton County, however, the Townhomes at Stony Creek incorporates a similar structure in-that, once housed, Family Promise will provide supportive services to its residents which will help them on their path to self-sufficiency. Continued support for organizations who provide emergency assistance, as well as those that provide general permanent affordable housing opportunities, will continue to be an important strategy for the county as it does place a stronger focus on the creation of affordable housing units.

### **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.**

From year to year, Hamilton County has provided CDBG funding to many of the local service providers actively working with extremely low-income individuals and families at risk of becoming homeless, often utilizing the full 15 percent allowed for allocation to public services.

As stated in the current Consolidated Plan, support of programs that help the most vulnerable households achieve self-sufficiency including additional case management services, has been a priority. While Hamilton County recognizes public service programs such as case management services, food pantries, legal services, health services, childcare, transportation, and fair housing are critical to addressing homelessness, it is placing a stronger focus on the creation of additional affordable housing units for program year 2023.

**Discussion**

During PY23, Hamilton County is working to identify and pool available resources for the creation of affordable housing units. Reallocation of previous year's remaining CDBG funds, combined with funds already allocated to affordable housing, will allow for greater leveraging of funds by the County as well as affordable housing developers seeking grant funds from additional sources. Encouraging partnerships between the developers and the local service providers will continue to be a critical component to any proposed affordable housing development.



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

### **Introduction:**

While barriers to affordable housing can come from anywhere, the U.S. Department of Housing and Urban Development (HUD) recognizes universal barriers. Local and state regulations on zoning and buildings are often the most recognized barriers to affordable housing. With increased regulation comes an increased cost to build housing that meets all regulations. In Indianapolis, housing cost burden and severe housing cost burden are the biggest needs among households, especially renter households. Housing costs have skyrocketed during the past few years exasperating an already difficult housing market. Some of the barriers to affordable housing include:

- Difficulty in acquiring enough parcels for infill development continues to prevent many builders from using economies of scale which they typically rely upon when developing affordable housing in suburban areas.
- Smart growth is a term used in public regulatory and policy debates regarding planning, land use and density. However, some smart growth principals, while appearing to be consistent with the goal of promoting affordable housing, can be used to justify controls that act as regulatory barriers to affordable housing.
- Administrative processes for developmental approvals continue to become more complex with ever-lengthening reviews and requirements for multiple, duplicative approvals. Each time a community adds substantive requirements, the review process becomes more complicated and burdensome.

Additionally, affirmatively furthering fair housing is a key concept to identifying and working to eliminate many of the barriers to affordable housing.

**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.**

Affordable redevelopment has been led by small non-profit community development corporations at the grass roots level. Some of these organizations have been able to develop large-scale multi-family projects but human capital in any one organization is limited to conducting one or two projects at a time. Many require multiple partners, coordination, and strong leadership to address redevelopment at a holistic level. Some ideas to overcome these barriers are:

- Streamline approvals and reviews of projects that are smaller in nature to reduce burden to the developer of small-scale affordable housing projects.
- Advocate at the State level to approve inclusionary zoning laws.
- Attract for-profit developers to partner with non-profit service agencies to develop affordable housing for extremely low-income families, connecting services and rental assistance with new

developments.

- Address public infrastructure in communities with affordable housing development, such as adding curb ramps and replacing deteriorated sidewalks, as an incentive for developers to increase affordable housing infill.
- Streamline resources available to address brownfields and other environmental issues that increase housing development costs. This can include connecting brownfield clean up resources to affordable housing resources ensure areas are primed for development.
- Find additional subsidy dollars to help extremely low-income households and special needs households afford rental units without a cost burden.
- Share positive stories with media outlets to counter negative stories and misrepresentations from other communities.

### **Discussion:**

Affordable housing development has traditionally been led by small non-profit community development organizations at the grass roots level. Due to limited capacity within these smaller organizations, building larger-scale projects is often a challenge. In order to provide more holistic services to its residents, these smaller nonprofits seek out and rely heavily upon strong partnerships with many of the local service providers helping support those individuals and families seeking affordable housing.

Hamilton County will continue to seek private/public partnerships, targeting communities working together to increase affordable housing options. Private/public partnerships are the key ingredients to address the biggest barriers to affordable housing development, such as educating the public and civic leaders about affordable housing, advocating for transportation options in all areas of the community and working together to attract additional subsidy to overcome high cost of property acquisition.

Hamilton County also certifies it will affirmatively further fair housing choice by conducting an analysis of impediments to fair housing choice, take appropriate actions to overcome the effects of any impediments identified, and maintain records reflecting the analysis and actions taken in this regard. The County is committed to ensuring fair housing choice for all residents within its jurisdiction.

The Analysis of Impediments to Fair Housing evaluated zoning and planning regulations and their impact on housing. The study has found that the following impediments to fair housing choice exist within Hamilton County:

Lack of affordable housing affects housing choice and may adversely affect the protected classes.

1. Knowledge of fair housing laws and where to report vary in the community.
2. Institutional and regional coordination of enforcement and advocacy needs to improve.

Hamilton County, as a recipient of federal CDBG, must take appropriate actions to overcome the effects of the impediments identified within this plan and maintain records reflecting the analysis and actions

taken. Over the next year the Noblesville Housing Authority will:

1. Partner and participate in the development of a Housing Needs Assessment to be used to secure funding to increase the community supply of affordable housing. Lack of affordable housing affects housing choice and may adversely affect the protected classes.
2. Conduct testing of multi-family communities to ensure property managers are following fair housing laws.
3. Work with city and county officials to provide information on fair housing and zoning.
4. Staff will continue to review and monitor funding agreements with subrecipients to include disclaimer that all subrecipients will affirmatively further fair housing.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

With the challenges facing the Hamilton County community living at or close to the poverty level, Hamilton County continues recognize it must develop goals which offer flexibility in programming for all its communities and increase the coordination among service providers. Since availability of affordable housing remains a county-wide issue, Hamilton County will continue to utilize the bulk of the Community Development Block Grant to address the lagging production of affordable housing. But it will also begin to investigate other options to promote greater production of affordable housing moving forward.

### **Actions planned to address obstacles to meeting underserved needs.**

As is often found, the major obstacle for meeting the needs of underserved communities in the county is a lack of funding. Each year NHA receives many more eligible and qualified requests for funding than CDBG funds. Considering this, the Hamilton County Commissioners have begun researching the creation of a Community Land Trust as a tool to better encourage affordable housing development, while also protecting its investment for the long-term. Additionally, Hamilton County is looking to restructure its funding application process to more heavily emphasized strong partnerships between developers and public service providers, as well as how future developments can compliment and support directed development within each of the participating municipalities.

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

With these two new strategies guiding local affordable housing efforts, it will be critical to also direct energies to education about and promotion of affordable housing and what it can look like for Hamilton County. NHA staff will continue to take advantage of opportunities to further promote affordable housing development and educate communities on the benefits of providing affordable housing for all income levels throughout the county. Additionally, NHA staff will maintain strong partnerships with local organizations and government entities to create a unified message and approach to promoting affordable housing.

### **Actions planned to reduce lead-based paint hazards.**

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 childcare 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. NHA, along with other local organizations, will continue to provide education and guidance on lead-based paint, its hazards, and methods for remediation. Whenever Hamilton County funds a housing rehabilitation project with CDBG funds, the work will be done in compliance with the

Environmental Protection Agency's lead-based paint rules and regulations.

### **Actions planned to reduce the number of poverty-level families.**

Tackling poverty is one of the most important factors in reducing social exclusion and improving the lives of residents. This strategy is crucial for demonstrating Hamilton County'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 five years include: Transportation services, childcare services, healthcare, food banks.
- Provide affordable housing opportunities to low and moderate-income households. Support the development of housing for extremely low-income households, particularly those earning less than 30 percent of the area median income. Develop a funding resource for households that do not meet the HUD income requirements but are at-risk of losing their housing.
- 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.

### **Actions planned to develop institutional structure.**

Through administrative efforts and partnerships in the community, NHA continues to focus on coordinating services across Hamilton County, with the intended outcome of improving services for low-income households. In the past, Hamilton County has worked closely with Good Samaritan Network to provide an outlet for this coordination and capacity building. With the COVID-19 pandemic, even more organizations have come together to discuss the needs of the most vulnerable residents in the community and how to best respond to those needs. The outcome has been the creation of two key coalitions, the Hamilton County Housing Collaborative, and the Community Organization Active in Disaster. Additionally, organizations which have not traditionally participated, have joined in the affordable housing conversation. These organizations include the local tourism bureau, youth specific organizations, private businesses, emergency management, Veterans Affairs, and other civic leaders. Additionally, 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.

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

Good Samaritan Network has been the primary way to connect all service providers throughout Hamilton County. The Hamilton County CDBG program continues to recognize and support the efforts of this organization, to not only build up the capacity of its members, but to also connect the members to local affordable 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 better address those with the most need.

**Discussion:**

Hamilton County is looking to develop more impactful methods to providing additional affordable housing units for all its citizens. Creating a Community Land Trust will be one new tool available to the County as it promotes affordable housing development among private and nonprofit housing developers, and partners with its municipalities to better incorporate affordable housing in the growth of each community.

## Program Specific Requirements

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

#### Introduction:

Community Development Block Grant funds are the only resource with the intended purpose of addressing affordable housing for low- to moderate-income households which Hamilton County anticipates receiving for program year 2023. Hamilton County will utilize its current year allocation, as well as remaining funds from previous program years to fund projects providing quality affordable housing for its residents living at or below 80 percent of the area median income.

#### 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
2. The estimated percentage of CDBG funds used for activities benefiting 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.	100.00%

Hamilton County will fund projects in PY23 that specifically address the need for affordable housing, as outlined in the current Consolidated Plan. After subtracting administration from the total allocation, 100 percent of the 2023 CDBG funding will benefit low to moderate income individuals. Hamilton County utilizes a three-year certification, covering fiscal years 2022, 2023, and 2024.