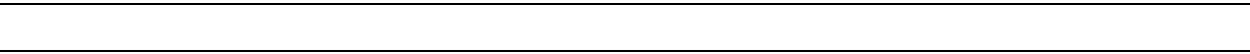


Hamilton County Indiana

DRAFT

2024 Strategic Plan



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SP-05 Overview

Strategic Plan Overview

Given the broad range of needs and the limited amount of resources available, the County can only meet a portion of the needs within the community. For the purpose of the Consolidated Plan, the needs identified as "high priority" are those that the County plans on addressing with available federal funds over the next five years. This Strategic Plan summarizes the community needs and identifies its high priority needs that it will address over the next five years. It also describes how the County will address its priority needs by identifying available resources (Anticipated Resources), who will carry out the activities (Institutional Delivery Structure), and how the conditions of the market will influence the County's actions (Influence of Market Conditions). Finally, the plan describes actions to address specific issues required by the regulations, including barriers to affordable housing, lead-paint hazards, and anti-poverty measures.

The goals set forth herein will measure performance over the term of the plan. It should be noted that it is difficult to estimate the funding levels for the CDBG program for the term of the Consolidated Plan. Given this, the goals listed in the plan are based on the assumption that funding will remain relatively stable over the next five years.

Throughout the entire planning process, the need for additional affordable housing units for consistently identified as the highest need and the best use of available funds.

AFFORDABLE HOUSING

The County expects to dedicate a large portion of its available resources to addressing affordable housing needs. The affordable housing strategy is focused on the creation of an affordable housing trust fund. The County will use CDBG funds for the acquisition of land and existing housing in order to increase the number of affordable rental housing units throughout the County. All of the acquired units will be placed within the trust in order to maintain long term affordability.

The County also plans to use CDBG funds for capacity building activities to kick start the creation of the affordable housing trust and the organization that will be tasked with administering the fund.

A portion of CDBG funds will be reserved for the creation of a minor repair program aimed at assisting seniors address deferred maintenance and make accessibility modifications.

While the County acknowledges the needs of persons experiencing homelessness and those at-risk of homelessness, the County will be considered a medium priority relative to the overall needs of affordable housing. By allocating available resources to increasing the affordable housing stock within the County, the need for homeless services, and the duration of homelessness, should be lowered. The need for additional shelter facilities and short-term social service needs will be better met with funding sources other than CDBG. The County will coordinate and support other organizations that seek additional funding to meet the needs of the homeless.

IMPROVE NEIGHBORHOOD INFRASTRUCTURE, FACILITIES, AND SERVICES

The County will partner with the participating cities in the Urban County to use available federal resources to subsidize the rehabilitation or development of neighborhood facilities and infrastructure. This includes facilities designed to serve neighborhoods and those designed to serve specific populations, such as persons with disabilities, seniors and the homeless.

PLANNING, OVERSIGHT, AND FAIR HOUSING

The remainder of available funds will be used for planning and oversight of the funded projects and programs. As a recipient of CDBG funds, the County is required to comply with a number of regulatory and reporting requirements, including actions to affirmatively further fair housing. The County anticipates adopting an updated fair housing plan in the first few months of this five year plan.

GEOGRAPHIC PREFERENCES

While the County did not identify any specific geographic target areas for the investment of available funds, the County will distribute a portion of funds to each of the participating cities so that they may address the community development and housing needs within their communities. The remainder of the funds will be available on a County-wide basis for projects that best serve the goals and strategies outlined within this plan.

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

The County will not make use of specific target areas to guide the use of available funds. As an Urban County, the County will distribute a portion of funds to each of the participating cities so that they may address the community development and housing needs within their communities. The remainder of the funds will be available on a County-wide basis for projects that best serve the goals and strategies outlined within this plan.

ESTIMATED BREAKDOWN OF FUNDS BY GEOGRAPHY	
County-wide	59%
City of Carmel	13%
City of Fishers	13%
City of Noblesville	9%
City of Westfield	6%

The County will make the following geographic considerations when selecting projects to carry out this plan:

- For activities such as street improvements and parks that provide a benefit to a specific neighborhood or area, the County is limited by the CDBG rules and regulations. These types of projects are only eligible if more than 33.6% of the residents in the neighborhood are considered low or moderate income.
- The need for additional affordable housing is not limited to any specific area in the County. The County will strive to make more opportunities available in areas in well-resourced low poverty areas that offer good schools, proximity to jobs, and other desirable amenities. The County will also seek to invest in older, established areas of the County, such as Noblesville and Home Place in Carmel, that may have opportunities for in-fill, redevelopment, and future growth. The County wishes to support the growth of balanced housing in the small rural communities of Arcadia, Atlanta, Cicero, and Sheridan but are constrained in that these municipalities are currently outside of the County's CDBG jurisdiction.

TRACT	BLKGRP	LOW	LMI	POPULATION	LMI%
110101	1	715	1,050	1,235	85.0%
110700	3	305	370	475	77.9%
110401	2	910	1,370	2,030	67.5%
110202	1	345	585	885	66.1%
110303	3	405	710	1,115	63.7%
110517	1	600	1,235	2,005	61.6%
110700	1	415	675	1,105	61.1%
111011	2	790	1,210	2,010	60.2%
111007	2	855	1,015	1,730	58.7%
110405	2	705	865	1,480	58.4%
110201	1	345	565	985	57.4%
110600	3	265	585	1,055	55.5%
110505	1	220	625	1,150	54.3%
110600	2	525	670	1,235	54.3%
110514	1	140	1,320	2,475	53.3%
110818	3	280	1,035	1,965	52.7%
110202	2	440	1,095	2,090	52.4%
110815	2	135	1,235	2,370	52.1%
110201	3	375	600	1,220	49.2%
110820	1	665	1,005	2,055	48.9%
110905	1	380	885	1,840	48.1%
110820	3	405	650	1,395	46.6%
110811	3	335	505	1,105	45.7%
110202	4	315	515	1,135	45.4%
110513	2	470	925	2,080	44.5%
110201	2	210	615	1,395	44.1%
110302	1	1,040	1,200	2,730	44.0%
110812	3	460	910	2,125	42.8%
110512	2	315	995	2,390	41.6%
110700	2	340	540	1,305	41.4%
110810	1	15	220	550	40.0%
110516	3	200	1,365	3,450	39.6%
110513	1	295	965	2,460	39.2%
111006	1	135	490	1,260	38.9%
110811	2	545	790	2,075	38.1%
111006	2	780	1,160	3,120	37.2%
110303	4	10	120	325	36.9%
111104	3	160	195	535	36.4%
110509	1	130	570	1,610	35.4%
110401	1	285	705	2,070	34.1%
111007	1	185	520	1,530	34.0%
110517	2	405	695	2,070	33.6%

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

Affordable Housing	
Priority Level	High
Population	Extremely Low, Low, and Moderate Small Families, Large Families, Families with Children, and Elderly
Geographic Areas Affected	Countywide
Associated Goals	Improve Condition of Housing Stock Create New Affordable Housing
Description	<p>The need to provide additional affordable housing opportunities is the highest priority of this plan. Additional units are needed throughout the County and for all income levels, including extremely-low, low, moderate, and middle income households. For the purposes of this plan, affordable housing includes:</p> <ul style="list-style-type: none"> (1) the need to rehabilitate existing affordable housing stock; (2) increase the number of affordable housing units; and (3) preserve existing affordable housing units that may be lost from the local stock. <p>There is a particular need for an increase in the number of rental units affordable to low and moderate income persons.</p>
Basis for Relative Priority	<p>The need for affordable housing in general was the most frequently heard comment made throughout the planning process. The County feels it can make the greatest impact with its limited amount of funds through strategic investments in the acquisition of land for development and existing units. Housing rehabilitation, including accessibility modifications, will allow seniors and persons with disabilities on fixed incomes remain in their homes.</p>

Homelessness	
Priority Level	High
Population	Chronic Homelessness, Individuals, Families with Children Mentally Ill, Chronic Substance Abuse, Veterans Persons with HIV/AIDS, Victims of Domestic Violence Unaccompanied Youth
Geographic Areas Affected	Countywide
Associated Goals	Create New Affordable Housing
Description	<p>This category of need includes emergency and transitional shelter, permanent supportive housing, and support for local social service providers and the Continuum of Care who provide on-going supportive services and homeless prevention programs. There is a particular need to increase emergency and transitional space within the County.</p> <p>The needs of the homeless population and those at risk of homelessness are deemed a medium priority for the purposes of this plan in that other funding sources are been identified to better serve this need.</p>
Basis for Relative Priority	The County has assigned homelessness as a medium priority based on consultations with the Continuum of Care and social service providers that cater to homeless and near homeless populations. By allocating available resources to increasing the affordable housing stock within the County, the need for homeless services, and the duration of homelessness, should be lowered.

Non-Homeless Special Needs	
Priority Level	High
Population	Elderly, Frail Elderly Persons with Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families
Geographic Areas Affected	Countywide
Associated Goals	Improve Condition of Housing Stock Create New Affordable Housing Improve Neighborhood Infrastructure and Facilities
Description	Non-homeless special needs populations include those are not homeless but require supportive housing and/or services to maintain housing. These populations include the elderly (ages 62 and over), the frail elderly, persons with disabilities, persons recovering from substance abuse, and persons living with HIV/AIDS. These populations often live on fixed incomes and may require housing assistance and supportive services. Projects that primarily serve persons with disabilities, such as ADA improvements and additional transit options, were also cited as a need during consultations with the participating cities.
Basis for Relative Priority	The County has identified the non-homeless special needs populations as a high priority based consultations with social service providers and the participating cities. The County will fund programs that make relatively low-cost strategic investments that will have significant impacts on the quality of life for the beneficiaries. As an example, funds used to make accessibility improvements for a disabled homeowner will allow that beneficiary to maintain their housing of choice and possibly avoid premature institutionalization. The County will also support the efforts of participating cities to address their ADA accessibility needs.

Non-Housing Community Development	
Priority Level	High
Population	Non-housing Community Development
Geographic Areas Affected	Countywide
Associated Goals	Improve Neighborhood Infrastructure and Facilities
Description	<p>Non-housing community development includes the need for public facilities, infrastructure, public services, and economic development. For the purposes of this plan, the needs described in this category apply mainly to the needs of households and neighborhoods that qualify as low and moderate income, meaning households earning less than 80% of the area median income based on household size.</p> <p>In consultation with the participating cities, it was expressed that additional CDBG funds were needed for infrastructure projects that served low and moderate income areas and those that addressed ADA and connectivity needs.</p> <p>Other areas of non-housing community development, such as economic development and blight removal, were not rated as a high need during the consultations with the participating cities.</p>
Basis for Relative Priority	The County considers non-housing community development to be a high priority for the purposes of this plan. Participating cities considered infrastructure improvement projects a priority in the use of their CDBG funds.

Public Housing	
Priority Level	Low
Population	Public Housing Residents
Geographic Areas Affected	Countywide
Associated Goals	Create New Affordable Housing Planning, Administration, and Capacity Building
Description	Public housing needs include the needs of housing choice voucher holders as the local housing authority does not own or manage any housing developments. The Noblesville Housing Authority (NHA) acts as the housing authority for the county. NHA is well managed and does not require CDBG funding for the administration of its programs.
Basis for Relative Priority	Public housing is assigned a low priority relative to the other affordable housing and community development needs because the County feels that the public housing authority has access to other resources to sufficiently address the needs of its residents. As the administrator of CDBG funds, NHA is well positioned to coordinate the efforts outlined in this plan with its efforts to serve its public housing beneficiaries to ensure that public housing residents are aware of and have access to programs and projects funded through this Consolidated Plan.

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

Influence of Market Conditions

Tenant Based Rental Assistance (TBRA)

The cost of rental housing within the market is unaffordable for extremely low, low and some moderate income households. A minimum wage earner, earning \$7.25 per hour, would need to work the equivalent of three full time jobs, 121 hours per week, to make a one bedroom apartment set at Fair Market Rent of \$1,145 "affordable", meaning gross rent is not greater than 30% of income. A household must earn \$45,800 for this unit to be considered affordable. For single-person households, this is equivalent to 64% of the area median income.

According to the latest CHAS data, there are 10,110 renter households that pay more than 30% of their income and would benefit from TBRA. Of those, 4,200 are considered severely cost burdened, meaning they pay more than half of their income for housing. Of particular concern are 3,665 renter households who earn less than 50% of area median income that are severely cost burdened. Any disruption in income or unexpected cost, such as an illness or car repair, could put the household at risk of homelessness.

TBRA for Non-Homeless Special Needs

The maximum monthly Supplemental Security Income (SSI) payments, a common form of income for persons with special needs, is \$943. If the person also qualifies for the average amount of disability (SSDI), they can receive monthly assistance in the amount of \$3,822. At this income, an affordable monthly housing burden is roughly equivalent to the Fair Market Rent for a one bedroom unit at \$1,145. If the person does not qualify for disability and only rely on SSI, the affordable monthly housing burden is only \$283.

The 2024 Fair Market Rent for an efficiency apartment is \$982 while a one-bedroom is \$1,145. Based on these figures, a person receiving only SSI would require a monthly stipend of approximately \$700 to make an efficiency apartment.

New Unit Production

The need for more affordable rental units was identified as the primary need throughout the planning process. The need is more pronounced for the lowest incomes, but there is large need for additional moderate and middle income units as well. The vast majority of units brought to market within the County are large, single-family detached units targeted to upper income families. Given the current costs of construction and land, the development of new housing is not feasible without large subsidies.

Rehabilitation

Given the age and condition of existing housing stock, the need for rehabilitation is relatively low for most of the county. There are some areas of the county with older housing stock. In a consultation with one of the affordable housing developers, it was stated that some of the subdivisions built in the 1990s are starting to require significant rehabilitation. Owner households with limited incomes may defer necessary repairs and maintenance which aggravates the housing issue and could lead to blighted conditions.

Acquisition, including preservation

In February 2024, the median price of a home was \$420,000. A 4 persons household earning 80% of the area median income (i.e. the highest possible income eligible for CDBG assistance) could qualify for a first mortgage of \$264,166, which would require a subsidy of over \$70,000 per home.¹

The most direct and cost effective approach to increasing the supply of rental housing may be to purchase existing units. Under one financial model, the County could provide a subsidy of \$75,000 to acquire a rental unit with a monthly rent of \$1,250 which would be affordable to all moderate income households and some low income households². The County is pursuing the creation of a land bank and a housing trust fund to support the acquisition of property. This strategy would allow the County to maintain the affordability of the housing in perpetuity.

¹ Assumptions: A first mortgage (30 Year at 7%) with a 80% Loan to Value with maximum principal and interest costs set to 30% of income.

² Assumptions: Target purchase price of \$300,000. The County is able to secure 80% of the purchase price at favorable below-market financing with lending partners.

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

Introduction

The main source of funding for the goals, programs, and projects discussed in this Consolidated Plan will come from the Community Development Block Grant (CDBG). The County plans to support projects that will be able to leverage additional funds from multiple sources, including other federal sources, state and local government funds, and private investment. For example, the County has allocated \$5 million of its federal American Rescue Plan Act (ARPA) award to fund an affordable housing “demonstration project” that should come to fruition during the term of this plan.

Community Development Block Grant (CDBG)

The Community Development Block Grant (CDBG) funds received by the County can be used for a wide range of community development activities directed toward revitalizing neighborhoods, economic development, and improved community facilities and services, provided that the activities primarily benefit low- and moderate-income residents. Some examples of how the CDBG funds can be used include:

- acquisition of land and property,
- housing rehabilitation for income-eligible homeowners,
- down payment assistance for homebuyers,
- social service programs for youth and seniors,
- clearance and demolition of blighted structures, and
- infrastructure and parks in income-eligible areas.

Section 108 Loan Guarantee Funds (CDBG 108)

As a recipient of Community Development Block Grant (CDBG) funding, the County is eligible to participate in the Section 108 Loan Guarantee program administered by the U.S. Department of Housing and Urban Development (HUD). Under this program, the County is able to leverage up to five times its annual CDBG allocation for large community development investments.

Anticipated Resources

Program	Expected Amount Available Year 1			Total:	Years 2-4
	Allocation	Program Income	Prior Year Resources:		
CDBG (Federal)	\$1,102,706	\$0	\$0	\$1,102,706	\$4,400,000

Table 1 - Anticipated Resources

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

The County expects to leverage and attract additional funding sources to help meet its goals. The County has earmarked \$5 million of ARPA for an affordable housing demonstration project. This project is meant to serve as a model for other affordable developments throughout the County. CDBG is expected to be used to support the development,

Other potential sources include state and local government funds, homeless funds from the Continuum of Care and the State of Indiana, and private funding invested in the local housing trust fund. The County will support the work of local housing developers in their efforts to secure tax credit and HOME funds through the State of Indiana.

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

The County has purchased a parcel of land that is designated to meet the needs of domestic violence victims. Potential uses include the development of a shelter or transitional housing. The County hopes that the development will take place during the term of this five year plan.

SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Hamilton County	Municipal	Lead Agency	County
Noblesville Housing Authority	Public Housing	Public Housing Administrator	County
Continuum of Care	Non-Profit	Homelessness	County/Regional
City of Carmel	Municipal	Participating City	Carmel
City of Fishers	Municipal	Participating City	Fishers
City of Noblesville	Municipal	Participating City	Noblesville
City of Westfield	Municipal	Participating City	Westfield

Table 2 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The County is fortunate to have a strong network of service providers within its jurisdiction, including a number of umbrella organizations whose purpose is to increase coordination and collaboration amongst the numerous agencies. The County has selected Noblesville Housing Authority, which acts as the public housing authority for the county, as the CDBG administrator. This partnership ensures coordination between the needs of public housing beneficiaries and the actions undertaken through this Consolidated Plan.

The County works closely with the participating cities of the Urban County to carry out projects within their communities. Participating cities will identify potential community development projects that they would like to support and work with the County and NHA to ensure program compliance.

The Good Samaritan Network (GSN) acts as Hamilton County’s primary collaborative network designed to enhance coordination between service providers and agencies. Since 1980, GSN and its partner agencies have served at-risk and underserved individuals in Hamilton County and reduced duplication efforts throughout the county. Partner agencies include social service nonprofits, faith-based groups, food pantries, schools, local hospitals, and government agencies.

The primary organization to serve the needs of homelessness within the County is the Continuum of Care (CoC). Hamilton County is part of a CoC that covers the entire State of Indiana with the exception of Marion County.

One concern noted during the planning process was a lack of dedicated staff to oversee and coordinate the proposed land bank and housing trust fund. The County has identified the use of CDBG for capacity building to kickstart the housing trust fund until other funding sources can be found to support its ongoing operations.

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	
Mortgage Assistance	X	X	
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	x	X	
Other			
Other			

Table 3 - Homeless Prevention Services Summary

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

The local Continuum of Care has instituted a coordinated entry system to coordinate intake among homeless services providers that evaluates the clients history and current situation to determine the best type of housing and supportive services for the client. As part of the intake process, clients are also assessed for eligibility for mainstream benefits.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above.

One concern noted during the planning process was a lack of coordination and communication between local social service agencies and the regional Continuum of Care. While the state is broken into regions for better local coordination, the region still spans multiple counties. While there is a benefit to regional coordination, it also makes it difficult to focus on the needs of the households within Hamilton County experiencing homelessness or near homelessness as those households must compete for resources with the others in the region. It was noted during the consultations that the local social service agencies were unsure if the referral to the Continuum of Care received services.

While some special needs populations, such as the elderly and persons with disabilities, are relatively well-served in the community, demographic trends such as the entry of baby boomers into the elderly and frail elderly populations will strain available resources of current providers. As the population ages, the needs of the elderly may extend beyond the current capacity of the service delivery system. During the consultation process, service providers indicated a growing need for accessibility improvements for aging and disabled homeowners. Others cited a need for more transportation options.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs.

The County will continue to participate in and support the Continuum of Care and its members. A focus of these efforts will be to ensure better coordination and communication with the CoC and advocate for the needs of the homeless within the County. This could include provision of access to the Homeless Management Information System (HMIS).

As described above, there is currently a lack of dedicated staff to oversee and coordinate the proposed land bank and housing trust fund. The County has identified the use of CDBG for capacity building to kickstart the housing trust fund until other funding sources can be found to support its ongoing operations.

SP-45 Goals Summary – 91.215(a)(4)

#	Goal Name	Years	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Create New Affordable Housing	2024 to 2028	Affordable Housing	CDBG Target Area Countywide	Affordable Housing	CDBG: \$1,366,002	Rental units acquired: 15 Housing Units
2	Improve Condition of Housing Stock	2024 to 2028	Affordable Housing	CDBG Target Area Countywide	Affordable Housing	CDBG: \$232,000	Homeowner Housing Rehabilitated: 20 Housing Units Services: 50 persons
3	Improve Neighborhood Infrastructure and Facilities	2024 to 2028	Special Needs Community Development	CDBG Target Area Countywide	Community Development	CDBG: \$2,812,657	Public Facility or Infrastructure Activities: 5 projects 4,000 Persons Assisted
8	Planning, Administration, and Capacity Building	2024 to 2028	All	CDBG Target Area Countywide	All	CDBG: \$1,102,706	Other: 1 Other

Goal Descriptions

1. Create New Affordable Housing

The County will use available federal resources to subsidize the acquisition and development of new affordable housing units within the County. Eligible projects may include the acquisition of existing units, acquisition/rehabilitation and acquisition/new construction. The County will focus on the development of additional rental housing but may subsidize homebuyer housing based on the merits on the proposed project.

1. Improve Condition of Housing Stock

The County will use available federal resources to support a minor rehabilitation program to meet the needs of seniors and persons with disabilities.

3. Improve Neighborhood Infrastructure and Facilities

The County will partner with the participating cities in the Urban County to use available federal resources to subsidize the rehabilitation or development of neighborhood facilities and infrastructure. This includes facilities designed to serve

neighborhoods and those designed to serve specific populations, such as persons with disabilities, seniors and the homeless.

4. Planning, Administration, and Capacity Building

The County will use available federal funds to comply with the planning, administrative, and reporting requirements associated with the HUD grants. These efforts will include actions to affirmatively further fair housing, address obstacles and barriers to affordable housing, and efforts to strengthen its non-profit partners to better serve the needs of the low and moderate income households within the County.

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

The County plans to support the development of a housing trust fund to acquire housing and land for the provision of affordable rental units. Over the term of the five year plan, the County has a set a goal of acquiring 15 units. The County plans to use a portion of its CDBG funding to subsidize the infrastructure needed for the affordable housing development planned at Baker’s Corner. That development is in its early stages of planning and the goal provided below (20 units) is only an estimate.

Program	5 Year Budget	Goal
Acquisition	\$1,102,706	15 units
Infrastructure (Baker’s Corner)	\$552,110	20 units

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

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

Not applicable. The Noblesville Housing Authority (NHA) does not manage any physical housing inventory.

Activities to Increase Resident Involvement

The Noblesville Housing Authority does not manage housing units and only administers the Housing Choice Voucher (Section 8) program. This program provides rental assistance to low income households to ensure affordability of market rate housing units that would otherwise be unaffordable. The household pays 30 percent of their gross monthly income towards rent and utilities and the voucher subsidizes the remainder of the rent owed to the landlord. NHA staff and residents have periodic open meetings to discuss various issues.

Is the public housing agency designated as troubled under 24 CFR part 902? If so, describe the plan to remove the ‘troubled’ designation.

The Housing Authority does not have a troubled designation.

SP-55 Barriers to affordable housing – 91.215(h)

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Regulatory barriers to affordable housing are public processes and requirements that significantly impede the development of affordable housing without commensurate health or safety benefits. These barriers can increase development costs by as much as 35 percent. A number of causes, including infrastructure costs, local building practices, bureaucratic inertia, and property taxes contributed to this network of barriers. When partnered with the Not In My Back Yard (NIMBYism) opposition that often arises against the location of affordable housing units, new developments struggle to get past the initial feasibility stages.

In 2023, the County successfully satisfied the requirements of a Voluntary Compliance Agreement (VCA) between HUD, the County, and the City of Noblesville, Indiana. The agreement removed an existing policy which restricted developments that utilized subsidized funding. The agreement also served as an impetus for the Hamilton County Housing Collaborative which is actively working to remove additional barriers across the County.

The County has identified the following as regulatory barriers to affordable housing :

IDENTIFIED BARRIERS

1. Local development codes and zoning. The County is considered a desirable place to live and municipalities are able to require high standards for potential development. While this contributes to the County's desirability, the additional costs incurred by developers are passed on to homebuyers and renters. In the fair housing complaint against the City of Noblesville, specific design standards, such as the prohibition of aluminum siding and minimum unit size requirements, were cited as barriers. Other standards that limit development including single family zoning designations, large lot size requirements, and minimum setback requirements. Additional barriers include areas where there is ambiguity in regulations and ordinances that may discourage developers from pursuing a project.
2. Not in My Back Yard (NIMBY). Restrictive zoning and development standards are public policy decisions which are largely made by public opinion. Vocal opposition by even a small number of residents can make affordable housing and multifamily housing difficult to obtain approval, especially if the proposal is subject to lengthy public hearings.

PROPOSED ACTIONS

1. The County, in conjunction with the Housing Collaborative, is conducting community engagement to alleviate community concerns and dispel rumors about affordable housing. The goal of the community engagement is to reduce the NIMBY opposition to affordable housing development. Once residents understand the need for a full range of housing options and the negative effects that a lack of affordable housing can have on a community, including adverse effects on economic development and transportation, policy makers should have more flexibility in the zoning and development regulations.
2. The County will develop a “model” affordable housing project to showcase a development that provides affordable housing and conforms to acceptable development standards.
3. The County’s Comprehensive Plan identifies a number of specific policy changes that can be made to remove potential barriers to affordable housing options:
 - a. Promote units that offer Visitability: (1) one zero step entrance; (2) doors with 32 inches of clearance; (3) one accessible bathroom on main floor.
 - b. Address and define micro-homes, elder cottages and shared housing in residential code. Include two living areas to permit family members or other caregivers to live near seniors.
 - c. Allow all modular and manufactured homes as an acceptable structure on residential lots.
 - d. Consider reducing the minimum square footage requirement for single family homes.

SP-60 Homelessness Strategy – 91.215(d)

The concept underlying HUD’s continuum of care framework is to provide services to homeless persons and those at-risk of homelessness at each step in the process to achieving a permanent, stable housing situation. The elements of this framework include:

- Prevention efforts are those meant to eliminate entry into the shelter system and to help a person or family maintain their current housing situation or to move directly into another permanent housing situation.
- Outreach, intake, and assessment efforts are the first steps to assisting a homeless person or family.
- Emergency shelter provides temporary housing in a safe environment until the person or family can identify a permanent housing situation.
- Transitional housing helps persons who need supportive services or a longer period of time to ready themselves for achieving a permanent housing situation.
- Safe, stable, and affordable permanent housing is the goal for all homeless clients. Permanent housing can take many forms, including traditional market rate housing, rental housing with short- or long-term subsidies, and permanent supportive housing for persons who benefit from on-going supportive services.

Most of the funds available for specifically addressing homeless needs flow from grants received through the Continuum of Care (CoC). While some jurisdictions within Indiana receive an allocation of Emergency Solutions Grants (ESG) directly from HUD, the County does not qualify for its own allocation. Instead, ESG funding is provided to local agencies through the State of Indiana. The County does recognize homelessness as a high priority need but feels funding other than CDBG are better suited to addressing those needs. Through the provision of additional rental housing units, the County hopes to alleviate the needs of persons experiencing homeless by providing more units that will offer permanent housing.

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

The County will provide support to the Continuum in its efforts to conduct outreach and assessment of the homeless in the area, including support for the HMIS system. Meeting the needs of the chronically homeless is a high priority for the CoC and outreach and assessment is a critical component to serving this population as some clients are resistant to receiving service.

Assessment includes evaluating the client’s housing needs and well as the needs for supportive services, such as counseling, drug and alcohol assessments, education, employment, and basic independent living skills. The client is also evaluated for eligibility of mainstream benefits like SSI/SSDI. Once within the network, the client is provided with linkage and referrals to other community resources.

Addressing the emergency and transitional housing needs of homeless persons.

As discussed earlier, the County has land available for the development of a shelter or transitional housing development to meet the needs of victims of domestic violence. The County will continue to partner with Family Promise and other local social service agencies to meet those in need of emergency shelter. The County will also work with the CoC to assist and coordinate with the emergency and transitional shelters that serve County residents.

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

The shortage of permanent supportive housing creates a bottleneck within the continuum of care for persons with mental health and substance abuse issues. If people are unable to transition from a shelter or temporary housing such as motel stays, households will return to living on the streets or in other situations unsuitable for habitation. Backlogs of persons within the shelter system also prevents other persons experiencing homeless from accessing the shelter system due to a lack of available beds. The County will continue to partner with the CoC to advocate and support the development of more permanent supportive housing. As mentioned above, the development of additional affordable rental housing (without supportive services) is also needed. The County expects to use available federal funds to subsidize the development of rental housing to meet this need.

The Noblesville Housing Authority received a small number of rental assistance vouchers for households at risk of homelessness. These vouchers will help at-risk households find stable housing within the private market.

Other strategies to shorten the time of homelessness include re-housing. Re-housing provides financial support and case management to homeless families to obtain permanent housing and independent living. This type of assistance is often most effective for clients who only need limited assistance to achieve stable housing and family types who have difficulty finding shelters that can serve them. The County is limited in how it can use the CDBG funds for this type of assistance but will support other agencies that pursue other funding sources to support rehousing strategies.

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

Homeless prevention includes the provision of rental assistance, utility assistance and supportive services directly related to help those in danger of eviction or foreclosure or other loss of shelter. According to consultations with local service providers, the level of need for homeless prevention and rental assistance has greatly increased since the COVID-19 pandemic. The County will support and coordinate with local partners to help prevent homelessness.

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

Describe actions to address LBP hazards and increase access to housing without LBP hazards.

According to the 2022 Childhood Lead Surveillance Report released by the Indiana Department of Health, 2,252 children in Hamilton County were tested for elevated lead levels in their blood. Of those, only 7 tests reported a level higher than ≥ 3.5 $\mu\text{g}/\text{dL}$ and none tested higher than 5 $\mu\text{g}/\text{dL}$ and no risk assessments were completed.

The State of Indiana passed legislation³ went into effect on January 1, 2023 that requires healthcare providers to confirm that children under 7 have been tested for lead, and if not, to offer this testing to the parent or guardian of that child. According to the Hamilton County Health Department, which serves as the primary agency for screening children with elevated lead blood levels, there were a total of 77 children who tested positive for elevated blood lead levels (BLL) above 3.5 in 2023. The Department also conducted 11 first time home visits.

Noblesville Housing Authority, as the administrator of CDBG funds and the administrator of housing choice vouchers, will coordinate with the Health Department to ensure communication between the two agencies and coordinate a response if a child with an elevated blood level lives in a subsidized unit.

While the County does not currently fund any housing rehabilitation programs, any occupied homes that were built prior to 1978 that may be rehabilitated, including affordable housing projects involving acquisition and rehabilitation, will follow the lead safe housing requirements mandated by HUD. The County will ensure all of its federally-funded housing programs are in full compliance with the lead-based paint hazard regulations (24 CFR Part 35). This includes assisting households with the appropriate lead-based paint inspection, testing, and abatement of lead-based paint hazards. The County will provide education through the distribution of lead-based paint information and literature and will seek greater coordination with state agencies to leverage additional resources.

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

Lead paint is a common problem throughout the older housing stock in Hamilton County. Older housing stock is focused in Noblesville, portions of the other participating cities, and the smaller towns in the northern portion of the County. The County will not focus its efforts to address LBP in any specific geography but will comply with the lead safe housing rule when applicable.

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

³ House Enrolled Act (HEA) 1313

The lead safe housing regulations are fully integrated into the design of the County's housing programs. This includes disclosure, determination of assistance threshold, lead safe work practices, and level of treatment.

SP-70 Anti-Poverty Strategy – 91.215(j)

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

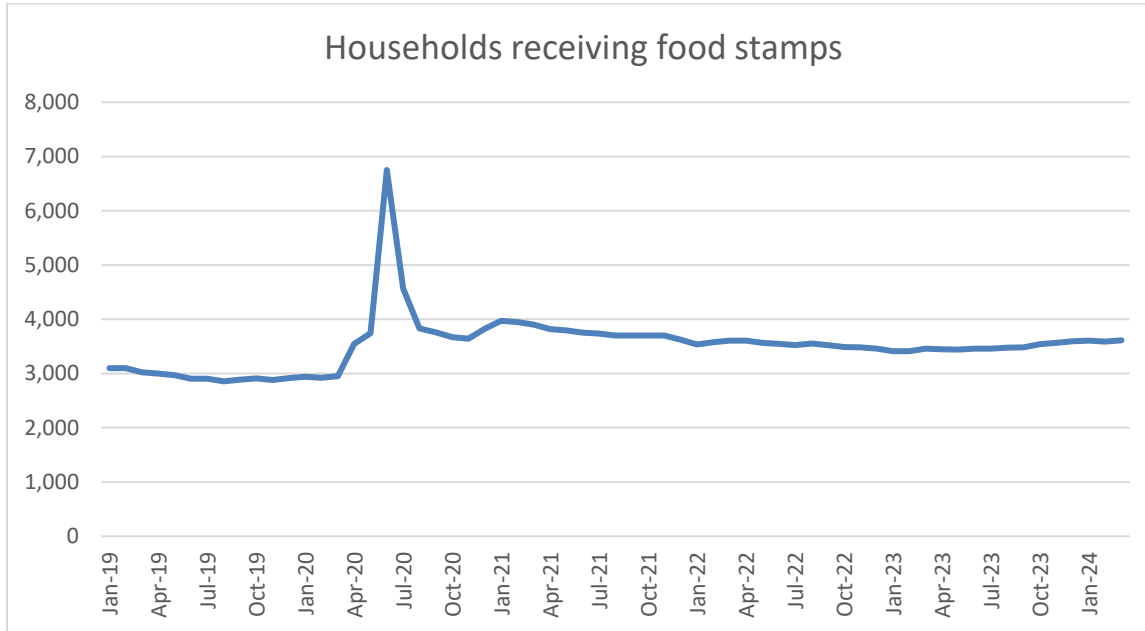
The County’s plan must describe its goals, programs, and policies for reducing the number of families in poverty within its jurisdiction. While the discussion of anti-poverty is important, there is a large gap between the poverty level and what is considered a “living wage” in Hamilton County. The following section describes the County’s efforts to assist families to make a living wage, which includes assisting families rise out of poverty.

The federal poverty rate is roughly equivalent to the extremely low income thresholds. The current poverty thresholds for a family of three is \$25,820 and \$31,200 for a family of four. Two minimum wage workers working full-time (40 hours) every week would earn \$30,160, which is slightly less than the poverty threshold for a family of four, and would qualify as low income.

According to the 1-year 2022 American Community Survey, the County as a whole has an overall poverty rate of only 4.6%. This accounts for 16,846 persons.

- In terms of age groups, 18 to 34 year olds accounted for the largest component of persons in poverty (39%), followed by 35 to 64 year olds (27%), children under the age of 18 (22%), and seniors ages 65 and older (12%). Women were overly represented (62%) compared to men (38%). While the majority of poor persons were White (73%), Black persons accounted for 10% of the poor population while accounting for six percent of the overall population.
- In terms of educational attainment, roughly half of the persons in poverty had some college education or higher (55%), while persons without any college education accounted for almost half of the population (47%). Among persons with a bachelor’s degree or higher, only 4.5 percent fell below the poverty level. As educational attainment decreases, the poverty rate increases to 13.7% for those with some college or an associate’s degree, 15.6% for high school graduates, to 42.9% for those with less than a high school degree.
- While employment has an obvious effect on poverty status, it does not always raise a household out of poverty. Of those employed, 1,018 persons full time for the last twelve months yet remained in poverty.
- The largest indicator of poverty is single parent households with children under 18. Overall, families with children had a poverty rate of 3.9%. Married couple families had a poverty rate 1.6% while single female households had a poverty rate of 16.6%. In other words, single mother households were eight times more likely to experience poverty compared to married couple families. The presence of multiple children increased the likelihood of poverty as well. Single mothers with three or four children had a poverty rate of 33.5%.

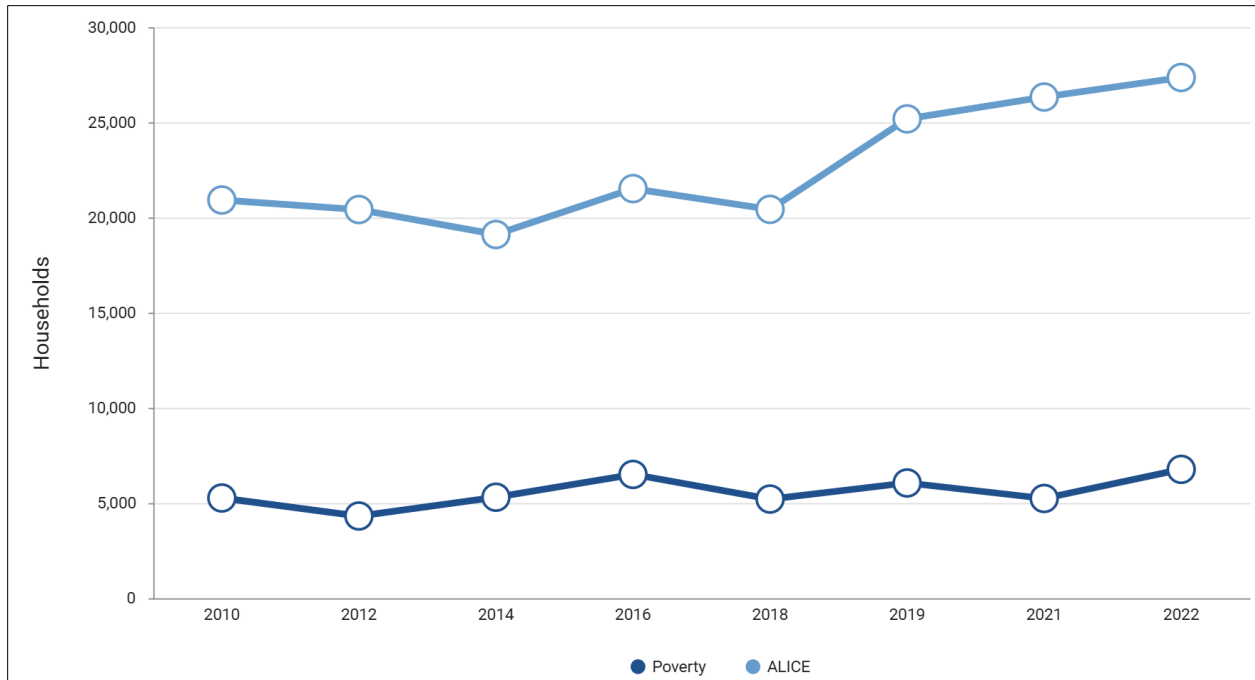
According to STATS Indiana, 3,600 households in the County receive SNAP benefits (i.e. food stamps). This includes households making up to 125% of poverty level income limits. While there was a large spike in beneficiaries due to COVID, households receiving have declined to pre-pandemic levels.



According to 2022 Year 5 ACS data, SNAP beneficiaries had the following characteristics.

- 1,802 households had children under the age of 18 (64%).
- 1,106 single female head of households were the most common household type, accounting for 39% of SNAP beneficiaries.
- 1,275 of SNAP beneficiaries (45%) were below the poverty level. The majority of beneficiaries (55%) fell between 100% and 125% of poverty.
- Amongst the 2,190 families receiving SNAP, the vast majority (84%) had one or more workers in the last 12 months. Forty one percent had two or more workers and still qualified for SNAP benefits.

The United Way has a campaign that focuses on households that are “Asset Limited, Income Constrained, Employed” or ALICE. ALICE households have earnings slightly higher than poverty levels but not enough to make ends meet. According to their methodology, a household in Hamilton County must make \$65,000 to make a living wage. Indiana United Ways’ most recent ALICE report found 27,357 Hamilton County households (20%) earn more than federal poverty level but cannot afford the basic cost of living. The graph below shows that since 2010, the number of poverty level households in the County has remained fairly flat while ALICE households has increased by 25%.



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

As CDBG can assist persons at higher income levels than other means-tested programs, CDBG may best be used to address the effects of “benefits cliffs” that beneficiaries experience as their incomes rise and they become ineligible for certain programs such as subsidized child care, food, and health care. When this effect is not addressed, households will sacrifice potential advancements and additional earnings in order to maintain a benefit. For example, a Hamilton County household with two full time workers making only \$10 per hour would no longer qualify for SNAP. To limit the effect of the benefits cliff, service providers should provide assistance at different levels of income to ensure families will be able to continue to become more self-sufficient.

Given the higher level of poverty for single parent households, anti-poverty programs should focus on supportive services that allow the parent to work while still ensuring the needs of their children are met. These types of services include day care, afterschool programs, youth programs, and transportation. To ensure families have access to well-paying jobs, job training and transportation services may be needed. Additional offerings, such as financial literacy and case management, may benefit a broad range of clients while others will require services targeted to specific types of clientele to address mental health or substance abuse.

The County is choosing to focus most of the resources available through the Consolidated Plan on meeting housing and infrastructure needs. Through its planning and coordination efforts, the County will continue to work with social service agencies and other providers that meet the needs described

above in order to reduce the number of families in poverty. These partner agencies have a measurable and major impact on alleviation of the effects of poverty by coordinating and providing essential social service programs that help create an independent, safe, stable, healthy lifestyle for homeless or at-risk individuals and families.

In terms of coordinating poverty reduction efforts and the affordable housing actions of this plan, the County will comply with the Section 3 requirements. The purpose of Section 3 is ensure that low and extremely low income persons, including those in poverty, benefit when federal funds are used in capital expenditure projects funded with CDBG. The County will encourage contractors bidding on capital expenditure projects to provide job training and employment opportunities for public housing residents and other low- and moderate-income residents in connection with construction projects funded under the Consolidated Plan. The County will also seek to work with Section 3 businesses. Section 3 businesses are those that are owned by low income persons or make a concentrated effort to provide employment opportunities for low income persons.

These provisions help foster local economic development, neighborhood economic improvement, and individual self-sufficiency. In this way, the County will comply with Section 3 of the Housing and Urban Development Act of 1968. The City has set the following goals in relation to its Section 3-covered projects: (1) twenty-five percent of all labor hours will be worked by low income persons and (2) five percent of all labor hours will be worked by low-income persons living near the project site. If the County is unable to meet these goals, it may undertake one or more of the following efforts to better meet the Section 3 benchmarks:

- Outreach efforts to public housing residents and other low income persons in regard to job openings and training opportunities. This would include job fairs and supportive services that provide referrals.
- Technical and other assistance to help Section 3 workers compete for jobs. This would include resume assistance, coaching, work readiness health screenings, interview clothing, uniforms, test fees, transportation, and child care.
- Direct, on-the job training (including apprenticeships) or paying tuition for off-site training. Offsite training includes assistance with community college and vocational/technical training.
- Outreach and technical assistance efforts to identify and secure bids from Section 3 business concerns. This includes bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns. This would also include the formation of a Youthbuild organization.

Monitoring – 91.230

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

The County, as the HUD grantee, and the Noblesville Housing Authority, acting as the CDBG administrator, are responsible for ensuring federally funded activities are carried out in accordance with all laws and regulations at the local, state, and federal level. When the County utilizes contractors, subrecipients, and developers to administer grant funded projects, the County is ultimately responsible for ensuring that those entities perform the scope of work in accordance with all applicable laws and regulations. To do this, the County will use the policies below to effectively monitor its funded activities.

County staff and the CDBG administrator will use a combination of desk monitoring and field monitoring throughout the year. Desk monitoring is an ongoing process of reviewing compliance and performance for a grant funded activity. It includes but is not limited to reviewing and analyzing the application, legal agreements or contracts, environmental reviews, drawdown requests for reimbursement, and performance reports. If the desk monitoring reveals additional oversight is needed, the County may schedule an onsite monitoring visit by program staff to resolve or prevent a problem. Staff will also provide technical assistance to subrecipients and other organizations seeking to participate in the CDBG program.