

Hamilton County, Indiana

2023 Consolidated Annual Performance Evaluation Report (CAPER)

Community Development Block Grant

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

CR-05 - Goals and Outcomes

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

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

The U.S. Department of Housing and Urban Development (HUD) awards Community Development Block Grant (CDBG) funds to communities across the U.S. Hamilton County received an allocation of \$1,102,310 in CDBG funds for the 2023 program year (PY23). To receive CDBG funding annually, Hamilton County must prepare a five-year comprehensive plan and corresponding annual action plans. The annual action plan describes what activities will be funded for the current program year to meet the goals and strategies developed in the five-year comprehensive plan. To achieve these goals, Hamilton County partners with a variety of organizations working towards the specific goals. The Program Year 2023 Consolidated Annual Performance and Evaluation Report (CAPER) then describes the activities and outcomes which were completed during that program year. This CAPER will discuss accomplishments which took place between October 1, 2023, and September 30, 2024, and progress made on the Plan Goals during the fifth year of the 2019-2023 Consolidated Plan. The following federal criteria apply to all activities utilizing CDBG funds:

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

The goals of the Hamilton County CDBG program, as established in the current Consolidated Plan for program years 2019 through 2023, in accordance with the regulations prescribed by the U.S. Department of Housing and Urban Development, are to achieve the following outcomes for low and moderate income (LMI) Households:

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

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

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration and Planning	Administration and Planning	CDBG: \$165,547.95	Other	Other	5	5	100%	1	1	100%
Affordable Housing	Affordable Housing	CDBG: \$0	Homeowner Housing Rehabilitated	Household Housing Unit	16	8	50%	0	0	0%
Affordable Housing	Affordable Housing	CDBG: \$246,888.81	Rental Units Constructed	Household Housing Unit	22	15	68%	66	15	23%
Homeless Assistance	Homeless	CDBG: \$62,843.00	Homelessness Prevention	Persons Assisted	50	2,090	4,180%	80	127	159%
Public Infrastructure and Facility Improvements	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$876,782	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1,410	44,564	3,160%	400	3135	784%
Public Infrastructure and Facility Improvements	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$0	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	20	0	0.00%	20	0	0.00%
Public Services	Non-Housing Community Development	CDBG: \$0 CDBG-CV: \$175,934	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10,425	94,542	906.88%	0	0	NA

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

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

Much of the focus continues to align with the goals set forth in the Consolidated Plan with the County Commissioners continuing to support the efforts and outcomes of the Hamilton County Housing Collaborative, as they have created four areas of focus to encourage the increased production of affordable housing units throughout the county. Program Year 2023 specifically focused on the development of affordable housing units. While the County certainly recognizes the value of the various supportive services offered to our most vulnerable populations, it has become very clear that access to Affordable Housing is a challenge for too many households, including a wider range of incomes. Hamilton County placed a singular focus on supporting and funding projects which would create additional affordable units. Some key activities included:

Expanding the supply of safe, decent affordable housing. As reported in the previous CAPER, Hamilton County provided funding to three active affordable housing projects. Of those projects, two have completed construction and have been fully leased, providing a total of 15 additional affordable units. The remaining project has finally worked through unanticipated additional costs and requirements and has begun initial site work. This past program year, Hamilton County has provided funding for two additional affordable housing projects proposed by local nonprofit housing developer, HAND, Inc. These two projects are anticipated to provide 12 additional affordable rental units. Discussion and planning is still taking place regarding transitional housing for victims of domestic violence in Hamilton County. In 2021, the county was able to acquire property for this project using non-CDBG funds. Additionally, the County was also able to purchase approximately 62 acres of land for future "workforce" housing. It is the intent of the County to transfer ownership of both parcels to a Community Land Trust to be created in the coming year.

Investing in public facilities and public infrastructure needs of low-income neighborhoods. During Program Year 2023, three of Hamilton County's participating municipalities completed much needed infrastructure projects benefiting low-income individuals and neighborhoods. First, the City of Fishers completed their PY22-funded project installing 60 ADA compliant ramps throughout the Oxford Park, Princeton Park, and Harvard Park neighborhoods, providing improved access and mobility for disabled individuals visiting and living within these communities. Second, the City of Noblesville also completed another sidewalk replacement project along Christian Avenue, just south of its downtown, and within an eligible census tract, continuing their efforts to revitalize the area as part of their comprehensive plan. Third, the City of Westfield completed a sidewalk installation project which now connects residents of the Glen Village neighborhood to adjacent pedestrian trails and a variety of amenities within walking distance of the neighborhood.

Improving institutional structure and coordination among providers across the county. The Noblesville Housing Authority, as the administrator of the County's CDBG funds, has continued to participate in various workgroups and attend regularly held meetings with many of the area nonprofits. Hamilton County is fortunate to have a strong network of services providers who have all recognized the need for increased affordable housing. NHA will continue to work with these organizations to identify ways to better streamline services, communication, and support, with the ultimate goal of housing our vulnerable populations.

Working with LUGs to provide information on fair housing and zoning. Recognizing the impact of municipal land-use policies on the production of affordable housing units, the county recently submitted a PRO Housing grant application to HUD which, if awarded, will allow the County to move forward on addressing the negative impacts certain land-use policies and processes have on affirmatively furthering fair housing, and access to affordable housing. While the concept of "Inclusionary Zoning" has become more prevalent throughout the United States, the State of Indiana has

regulations in place prohibiting its communities from considering this approach. Hamilton County has, therefore, been looking to other ways to encourage affordable housing development and provide fair and equitable access to quality affordable housing.

CR-10 - Racial and Ethnic composition of families assisted

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

With the activities completed for PY23, most beneficiary data gathered did not require detailed assessment of income or demographics. Demographic data included pertains to Affordable Housing projects only and is provided below:

	CDBG
White	13*
Black or African American	2*
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	15*
Hispanic	2*
Not Hispanic	13*

Table 2 – Table of assistance to racial and ethnic populations by source of funds, *As of 11/6/24 beneficiary data not complete

Narrative

A total of 13,948 persons were assisted with CDBG and CDBG-CV funds during program year 2022. Numbers that are not reflected in the above table include 580 “Other or Multi-racial” individuals.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$2,444,832.60	\$1,518,282.80

Table 3 - Resources Made Available

Narrative

Activities carried out through CDBG funding were directly related to efforts supporting the County’s Consolidated Plan and PY2023 Annual Action Plan, which primarily focused on the creation of additional affordable housing units. Hamilton County received \$1,085,620 in fiscal year 2022 in addition to any funding remaining from previous funding years. During the 2022 program year, Hamilton County expended \$996,667.17.

Narrative

Hamilton County has not established a specific target area to direct funding. Annually, a portion of CDBG funds continue to be allocated to participating municipalities, with remaining funds available for use throughout the entire county. As the County considered allocation of funds for county-wide affordable housing projects, location and access to critical amenities was an important factor. The two affordable housing projects receiving funding in PY2023 happened to be located in two of the county's participating municipalities, as both projects are located near a wide variety of daily amenities.

Leveraging

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

Hamilton County encourages efforts by its local participating municipalities, Carmel, Fishers, Noblesville, and Westfield, to leverage federal investments as part of public infrastructure projects in their communities. During the 2023 fiscal year, only minimal local funding was identified by the municipalities for infrastructure projects. Hamilton County also encourages efforts by local affordable housing entities to utilize CDBG funds in leveraging funding through other competitive grant programs, such as state HOME funds, LIHTC funds, and FHLB funds to provide additional quality affordable housing throughout the county. Affordable Housing activities initiated during PY23 have also utilized funding awarded through the competitive grant programs previously mentioned. In recent years, the County has acquired to separate parcels of land, with local funds, with the intent of providing needed housing for survivors of domestic violence as well as attainable housing for the county's workforce.

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	66	15
Number of Special-Needs households to be provided affordable housing units	0	0
Total	66	15

Table 4 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	62	11
Number of households supported through Rehab of Existing Units	4	4
Number of households supported through Acquisition of Existing Units	0	0
Total	66	15

Table 5 – Number of Households Supported

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

In the final year of its Consolidated Plan 19-23, Hamilton County has shifted focus more directly onto Affordable Housing activities, recognizing that not only had the County exceeded its goals set for Public Service activities, but the real need for additional affordable rental units was reaching critical levels. With only twenty-five percent of the allocation historically going towards affordable housing development, it has been challenging to show progress in the creation of additional affordable rental units. This is primarily due to the need to leverage CDBG funds with other funding sources, requiring increased time devoted to just securing enough funding to complete the proposed project. Additionally, construction projects often take more than a year to complete, delaying the reporting of successful outcomes.

Discuss how these outcomes will impact future annual action plans.

Moving forward, Hamilton County has implemented changes in its approach to allocating CDBG funds. Hamilton County is moving forward on establishing a Community Land Trust which will not only serve as an efficient tool for increasing affordable housing development but will also be critical in the preservation of existing affordable housing. County Commissioners have also sought out additional funding sources to support the CLT and its efforts to provide opportunities for residents to secure affordable housing. Hamilton County has developed its Consolidated Plan for 2024-2028, which also discusses this new approach and provides more detail on the organizational plans and programs that will be part of the CLT and Hamilton County’s comprehensive affordable housing plan.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	1*	0
Low-income	8*	0
Moderate-income	6*	0
Total	15*	0

Table 6 – Number of Households Served *As of 11/6/24 beneficiary data not complete

Narrative Information

The majority of activities funded in PY22 did not require income documentation of individual households, therefore the above data does not fully reflect all those served.

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

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

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

As stated previously, Hamilton County had quickly reached its 5-year goal regarding the needs of homeless persons. With that in mind, the focus for PY2023 was shifted primarily to the creation of affordable housing units. Fortunately, even though county CDBG funds were not directed towards specific Public Service providers, Hamilton County's local nonprofits were still able to provide services to their target populations via other funding sources.

Addressing the emergency shelter and transitional housing needs of homeless persons

While funding has been allocated in previous years for Public Services providing for the needs of homeless persons, the plan to develop an emergency shelter for survivors of domestic violence has experienced significant delays, primarily due to changes in ideology around the type of housing which would best serve this population within Hamilton County. Current discussions are expected to generate new and more progressive ideas which will ultimately receive funding support through the CDBG program.

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

As previously mentioned, the shift in focus to the development of additional affordable housing will provide a more effective long-term solution by constructing actual units for these low income populations. Hamilton County is fortunate to have a strong network of service providers who continue to provide support to those in need, even without CDBG funding. Providing affordable housing once the household has received supportive services is a critical step in their path 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

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

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

Actions taken to address the needs of public housing

The Noblesville Housing Authority (NHA) is the public housing agency serving all of Hamilton County. NHA does not own or manage any public housing units. NHA does manage the Housing Choice Voucher (HCV) program, "Section 8" vouchers for low-income households. The Housing Choice Voucher program offers subsidy to a household to allow them to rent any residential unit in the local housing authorities' jurisdiction. The household will pay approximately 30 percent of their monthly adjusted income towards monthly housing costs and the Housing Choice Voucher covers the remaining cost. IHEDA also has a voucher program serving Hamilton County. Households receiving assistance from the IHEDA program do not need to transfer into the NHA program to receive assistance in the Hamilton County jurisdiction. The cooperative agreement between the NHA and IHEDA has enabled more households to benefit from the services and amenities in Hamilton County. The most immediate need for NHA is finding additional funding and increasing the number of vouchers available to aid Hamilton County residents in need. NHA has an Annual Contribution Contract (ACC) with HUD for 203 Housing Choice Vouchers (HCV) monthly. Turnover of vouchers is slow as most households do not "graduate" from needing a subsidy. Demand for accessible one-bedroom housing units is the greatest need in the community. To address the continued increase in rent amounts charged by landlords, NHA adopted the Small Area Fair Market Rent payment standards and, in most areas, is using the maximum 110% of the published Fair Market Rent amounts. This change has proven to be a great benefit to our tenants and to the participating landlords. Demand for new vouchers has continued to increase with the cost burden of housing in Hamilton County increasing for many families. The waiting list last opened from August 31, 2022, to September 9, 2022. During that 10-day timeframe, 2,290 households submitted pre-applications to be added to the waiting list. NHA selected 200 households to be added to the waiting list based upon local preference and lottery. Since the closing of the waiting list, NHA has been able to provide vouchers for most households on that list. It is expected that NHA will open its waiting list again before the end of 2024.

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

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

Actions taken to provide assistance to troubled PHAs

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

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

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

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

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

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

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

Large apartment complexes with corporate ownership represent nearly all rental housing stock in Hamilton County with very few providing affordable rents based on income. Additionally, corporate requirements on minimum employment history and credit history add to the challenge of securing affordable housing.

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

Hamilton County continues to set the goal to develop rental housing for underserved needs households in the community, including extremely low-income households, senior households, or recently homeless households. It has become clear the existing funding allocated to affordable housing is not enough to make meaningful progress. Efforts are already being made to secure other funding sources which will allow for the creation of the Hamilton County Community Land Trust (CLT). The CLT will serve as a valuable resource in securing more land for affordable housing development and preserving existing and future affordable housing throughout the county. In 2021 the Noblesville Housing Authority commissioned a study on behalf of the Hamilton County Housing Collaborative, a coalition of 50-plus individuals representing dozens of organizations working to address the communities housing needs. As a group, the Collaborative believes that housing should be attainable for those who want to call Hamilton County home-during every stage of their lives-to uphold the economic well-being of Hamilton County. For that to be possible the county needs a

continuum of housing products and prices.

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

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

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

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

The Hamilton County Health Department recommends that children six (6) years old and under be screened for lead, particularly those children living in, regularly visiting or attending a 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.

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

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

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

As has been previously stated, Hamilton is directing its focus towards the development of affordable housing as part of the continuum of care provided by local service providers. Of those served by these agencies, most of the individuals earned income less than 30 percent of the median income.

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

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

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

Large apartment complexes with corporate ownership represent nearly all rental housing stock in Hamilton County with very few providing affordable rents based on income. Additionally, corporate requirements on minimum employment history and credit history add to the challenge of securing affordable housing.

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

The Good Samaritan Network (GSN) is the primary way to connect all service providers throughout Hamilton County. The network includes a variety of providers, from large/corporate health providers to smaller, faith-based food pantries. The Network will continue its efforts to build capacity and coordinate service provisions across the county in the coming year. Hamilton County and the Noblesville Housing Authority want to support and expand the efforts of this organization to not only build up the capacity of its members, but to also connect the members to local housing providers and the Region 8 Planning Council for the Indiana Continuum of Care. By connecting the three different organizations, planning efforts will be more streamlined, and projects developed from those efforts will go more to address the households and individuals with the most need.

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

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

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

Hamilton County will use partnerships with State Government, local non-profit housing providers, local public service providers or community development advocacy groups to go beyond the steps listed in this plan to promote fair

housing. Hamilton County will support other initiatives by the State of Indiana, the City of Anderson and the City of Indianapolis, all neighboring jurisdictions with their own Analysis of Impediments to Fair Housing, to promote fair housing. Such initiatives may include education programs related to fair housing, homeownership training or landlord/tenant legal services. As discussed previously, on January 8, 2019, the initial meeting of the Hamilton County-City of Noblesville Affordable Housing Working Group met at the Noblesville City Hall. Since this first meeting several additional groups have been formed to address issues and develop solutions to for the affordable housing crisis in Hamilton County. As a result, the city of Noblesville has significantly strengthened its oversight and review of ordinances and projects to ensure that all ordinances and housing projects brought to the city are reviewed for and examined for barriers or impediments to the development and preservation of affordable housing. NHA continues to work with the Noblesville Diversity Coalition to develop an affordable housing outreach and education plan for Noblesville. The City of Noblesville is currently completing a housing analysis that updates the study completed in 2016. They are also working with a variety of not for profit and for-profit developers to develop over 300 units of affordable housing.

CR-40 - Monitoring 91.220 and 91.230

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

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

Initial Review of Project Eligibility

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

Ongoing Review of Project Compliance

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

Follow-up and Enforcement

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

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

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

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

As outlined in the County's Citizen Participation Plan, efforts were made to provide the community with reasonable notice and opportunity to comment on annual performance reports. Notice of this document, the Draft PY2023 Consolidated Annual Performance and Evaluation Report was published in the Hamilton County Reporter newspaper and The Times of Noblesville newspaper. It was also posted on the Hamilton County website as well as the Noblesville Housing Authority website. Additionally, hard copies of the report were available at the Noblesville Housing Authority. The draft was available for a fifteen-day comment period, from November 8, 2024, until November 23, 2024, and comments could be submitted in writing, via phone, or via email.

CR-45 - CDBG 91.520(c)

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

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

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

No

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

N/A