



# Hamilton County, Indiana

2021 Action Plan – Draft

July 1, 2021

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## **Executive Summary**

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

#### **1. Introduction**

The U.S. Department of Housing and Urban Development (HUD) awards Community Development Block Grant (CDBG) funds to communities across the United States to address a wide range of eligible housing and community development needs. CDBG funds are allocated annually among states and location jurisdictions, both “entitlement” and “non-entitlement” communities, with states distributing funds to non-entitlement localities. Entitlement communities are comprised of central cities of Metropolitan Statistical Areas (MSA) with populations of at least 50,000 and urban counties with populations of at least 200,000. Annual CDBG allocations are determined based on a variety of factors including the poverty rates, population size, growth rates, and housing conditions such as the age of the housing stock and other housing problems such as overcrowding. Programs and projects must benefit low to moderate-income households, individuals or neighborhoods with high percentage of low to moderate-income residents. Hamilton County will receive an allocation of \$1,092,260 for fiscal year 2021.

As required by HUD Notice “CPD-19-04” the City of Carmel, Fishers, Westfield and Noblesville, must officially notify the Commissioners of Hamilton County and the U.S. Department of Housing and Urban Development (HUD) Indianapolis field office that they wish to work with Hamilton County under a joint agreement to participate in the “Urban County” program for Federal Fiscal Years 2019-2021. In the fall of 2021, Hamilton County must begin the renewal process for the next three years.

The towns of Atlanta, Arcadia, Cicero and Sheridan have “opted out” of the Hamilton County CDBG program, meaning the CDBG funding from the county generally may not be spent within those areas. Persons or organizations wanting to receive a grant to serve any of these communities must seek assistance through the Balance of State program with the State of Indiana, Indiana Housing and Community Development Authority. These towns will have to notify the Commissioners of Hamilton County and HUD if they wish to continue to “opt out” of the Urban County designation when it is time for renewal.

Hamilton County has a Memorandum of Understanding (MOU) with the Noblesville Housing Authority (NHA) to administer and implement the CDBG program, including oversight of the projects selected by the Commissioners of Hamilton County. Staff at NHA conduct the public input process, release a Request for Proposals, and make recommendations for funding based on eligibility and responding to the needs of the community. The Commissioners of Hamilton County make the final decisions on projects for CDBG

funding. The fiscal year for Hamilton County runs from October 1st of each year until September 30th. This Action Plan covers the time period from October 1, 2021 until September 30, 2022.

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

Many of the people the funding is intended to benefit are hidden among the more affluent in the community. While Hamilton County features the highest median household income and median home value and lowest percentage of the population living in poverty of any county in the state, it also experienced a sizeable increase in recent years in homelessness and more demand for assistance from service providers in the community.

The unique spatial distribution of wealth, employment, and overall opportunities throughout the county makes all county-level management strategies and/or plans difficult, with the southern part of the county characterized as a developed suburb of a major metropolitan area, Indianapolis, and the northern part of the county as rural. The needs between the north and south can vary greatly and pose different challenges for developers. In the south, access to affordable land for housing development increases costs and need for rental assistance subsidies while developments in the north face the challenge of being far from public services and amenities needed by low-income families. Access to public services and locational amenities is an issue in the north because many of the social services are based far from the rural areas of the county. Transportation is a universal issue, with travel to a grocery store or work representing a challenge for many low-income families with no reliable family car or access to public transportation.

The level of coordination required to successfully administer the program is substantial. While the neighbor to the south, Marion County/Indianapolis is part of Unigov that united the county and municipalities into one, central government, the Noblesville Housing Authority must work with eight different municipalities, four of which are towns and four are cities, nine townships and one county government. Collecting data on those served and their needs as well as the public facility/infrastructure needs requires contacting multiple agencies and often involves different formats of information.

With those three challenges facing the Hamilton County community, the Noblesville Housing Authority has developed some general priorities and goals to offer flexibility in programming for all communities and increase the coordination among service providers. Under each priority is a list of goals that will meet the needs of the communities in the northern and southern parts of the community. While some goals may not be applicable to those in the northern communities, others will meet their needs and vice versa for those communities to the south.

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.

The final priority does not have any specific projects or programs that will be funded by the Noblesville Housing Authority. Through administrative efforts and partnerships in the community, the Noblesville Housing Authority will work to increase coordination across Hamilton County, with the intended outcome of improving services for low-income households.

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

The Noblesville Housing Authority (NHA), as a representative of Hamilton County, has implemented Community Development Block Grant funded programs since 2004, accounting for 17 program years. Over that time, the NHA has made great strides to assist low-income households in the community.

Hamilton County is in its second program year of the 2019-2023 Consolidated Plan. Because Hamilton County is in the middle of its PY2020 year, the progress below can only be reported for the first year of the Consolidated Plan, PY2019.

- Provide overnight shelter: 79 homeless individuals served
- Improve public facilities and infrastructure in each of the four major cities: 12,947 people served
- Homelessness prevention services: 409 people served
- Public Service Programs: 17,601 people served

In PY2020, Hamilton County received money from through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). While some of those activities did take place in the fall of 2020, they have not been recorded in the numbers above. Final accomplishments for those activities will be reported in the coming year.

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

Hamilton County began the 2020 Action Plan process in February 2020, posting notices for public meetings and strategizing how to reach out to individual organizations for consultation. The first public meeting was

scheduled for March 19, 2020 at the Hamilton County 4-H Fairgrounds Conference room. At the same time, communities, businesses, and schools were beginning to close due to the Indiana Governor's Orders for closure during the COVID-19 pandemic. Since no individuals attended the meetings, Hamilton County relied on outreach to stakeholders in the community, representing a variety of services and housing programs. Many of the conversations among providers began to pivot quickly from discussion of the 2020 Action Plan to that of the COVID-19 pandemic response, including the use of supplemental funding through the Coronavirus Aid, Relief, and Economic Security Act (CARES). Hamilton County received \$1,693,665 of Community Development Block Grant funding through the CARES Act. While this Action Plan does not include any CDBG funding through the CARES Act, many of the conversations via zoom and other virtual platforms discussed the changing needs of the community because of the pandemic. While the needs of the community have only been exacerbated by the pandemic, it did offer an opportunity to continue public input and consultation processes year-round rather than the traditional annual process.

Following the Hamilton County Citizen Participation Plan, the following meetings were held to solicit input:

- June 16, 2021 at 2:00 PM
- July 22, 2021 at 2:30 PM

Additionally, the 2021 Action Plan was available for public comment from July 1, 2021 to July 30, 2021. Comments from the public will be incorporated in the final draft of this document.

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

Comments from the public will be incorporated in the final draft of this document. Some of the comments received to date are listed below:

- Encourage the financial support for a lasting project that will meet the ongoing needs for many years to come – such as the renovation of housing suitable for our homeless population.
- Encourage the financial support for the monies to be used for a lasting project such as homeless and/or women's shelter.
- Support for funding the development of a homeless shelter.

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

Hamilton County accepts all comments from the public. The final draft of this document will include a summary of all comments received.

## 7. Summary

The reputation of Hamilton County is of a fast-growing community, with much wealth and a “good place to live,” with top schools in Indiana. Much of the hard data will state that there is a need in the community to develop a range of affordable housing, there is a large supply of housing and that homelessness and poverty is a small issue in the community. The consultation process will talk about the hidden needs in the community and the need to provide services locally instead of sending them to neighboring communities.

Over the next year the Noblesville Housing Authority will work with organizations in the community to meet the needs of the hidden, working poor in the community that may be living pay check to pay check, surviving on social security or being “priced out” of the growing communities. Some of the programs offered in the coming year will include:

- Family Promise of Hamilton County, providing case management and program services for homeless individuals and households and those at risk of homelessness.
- Shepherd’s Center of Hamilton County, providing senior care packages for elderly residents.
- Meals on Wheels, offering meals to individuals who are elderly or housebound and cannot cook for themselves.
- Good Samaritan Network, offering food transportation assistance to those households impacted by the COVID-19 pandemic.
- Affordable housing development projects, including the acquisition of land to create 9 to 11 more affordable housing opportunities.
- Public infrastructure projects to improve the quality of life for neighborhood residents

Each of these programs will go towards improving the daily lives of low to moderate-income residents, either directly or indirectly. This Action Plan will speak in more detail of the process used to select projects, the specific goals to be addressed and specific projects funded with CDBG dollars for program year 2021.

**PR-05 Lead & Responsible Agencies – 91.200(b)**

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

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	HAMILTON COUNTY	
CDBG Administrator		Noblesville Housing Authority
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

**Table 1 – Responsible Agencies**

**Narrative (optional)**

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



### **Consolidated Plan Public Contact Information**

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

CDBG Program

Noblesville Housing Authority

Attn: Linda Knight, Community Development Program Manager

320 Kings Lane

Noblesville, IN 46060

317-773-5110

[lknight@gonha.org](mailto:lknight@gonha.org)

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

### **1. Introduction**

Hamilton County began the 2021 Action Plan process in February 2021, during the COVID-19 pandemic. Many of the conversations NHA staff had among providers began to pivot quickly from discussion of the 2021 Action Plan to that of the COVID-19 pandemic response, including the use of supplemental funding through the Coronavirus Aid, Relief, and Economic Security Act (CARES). While this Action Plan does not include any CDBG funding through the CARES Act, many of the conversations via zoom and other virtual platforms discussed the changing needs of the community as a result of the pandemic including the rising cost of construction materials.

### **Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))**

Since 1894, the State of Indiana requires towns and townships to provide “poor relief” to individuals in need; relief can include housing, utility, food, and/or medical assistance. As a result, assistance to those in need in the county typically begins with the Township Trustee. There are nine townships in Hamilton County: Adams, Clay, Delaware, Fall Creek, Jackson, Noblesville, Washington, Wayne, and White River. The individual in need of assistance contacts his/her Township Trustee. The Township Trustee then may provide assistance for basic necessities that is feasible/available directly through the Township Trustee’s office and then, where necessary, refers the individual to a host of other agencies or organizations throughout the county for additional assistance. One such organization is The Good Samaritan Network (GSN), which acts as Hamilton County’s primary collaborative network designed to enhance coordination between service providers and agencies.

The Good Samaritan Network (GSN) formed in 1995 as a collaborative network of organizations in Hamilton County. The organization had two orienting goals: first, to better serve at-risk and underserved individuals in Hamilton County and to reduce duplication efforts throughout the county. The vision of the GSN is to “position ourselves in the community with a suitable location and with strong financial services – aligned to an effective organizational structure for the facilitation, collaboration, and coordination of appropriate services to those residents of Hamilton County in need of physical, spiritual and emotional support; who find themselves among the at-risk people we serve.” The network of providers includes the Noblesville Housing Authority, private affordable housing providers, nonprofit health agencies, mental health agencies, local housing shelters, and other public service agencies.

The GSN utilizes two approaches to service provision: Direct and Indirect services. The Indirect services approach is operationalized with the GSN serving as an intermediary organization between individuals in need and organizations that provide programs and services that can meet those needs. Since 1995 GSN has developed a pathway to connect and support at-risk individuals and families with its collaborative network approach, comprised of:

- Nonprofit social, governmental and emergency agencies throughout Hamilton County
- Food, clothing, and baby pantries that stock, serve and support Hamilton County
- Township trustees who refer clients to GSN
- Local Hamilton County Churches
- Partnering Businesses and Corporations who support GSN through community service projects, donations, and events.

The GSN provides resources and support for critical human services to network service providers making them stronger and more effective; with a goal of uniting for the common good rather than duplicating efforts and competing for funding.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The Indiana Balance of State Continuum of Care includes 91 of the 92 counties in the state. These 91 counties are divided into 16 regions and each region is overseen by a regional planning council and chairperson. Hamilton County is part of Region 8 in the Indiana Balance of State CoC along with Boone, Hendricks, Madison, and Hancock Counties. The Region 8 CoC works with a variety of providers in Hamilton County including, but not limited to: GSN, Prevail, Township Trustee offices, Third Phase, Family Promise, Aspire Indiana, Community Corrections, and the Noblesville Housing Authority. The CoC will continue to work with local service providers to address the needs of the homeless in the county. They will continue to look for affordable housing in Hamilton County and provide assistance as it is available. They will also provide Support Services (employment services, case management, etc...) to those who receive rental assistance.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

Hamilton County does not receive Emergency Solutions Grant funding as an entitlement jurisdiction. Organizations located in Hamilton County are able to apply for statewide funds through The Indiana Housing and Community Development Authority (IHCDA). According to IHCDA, Emergency Solutions Grant Rapid Rehousing and Homeless Prevention funds in Hamilton County are administered by Aspire Indiana, Inc., a private non-profit organization, in coordination with the CoC. Aspire Indiana, Inc. serves Hamilton, Boone, Hendricks, Madison, and Hancock Counties.

As part of the Region 8 of the Indiana Balance of State, all recipients of Emergency Solutions Grant funds and Continuum of Care funds must participate in the utilization of a Coordinated Entry System and Homeless Management Information System (HMIS) to track the services and housing assistance provided to households and individuals. Coordinated entry processes help communities prioritize assistance based on vulnerability and severity of service needs, to ensure that people who need assistance the most can receive it in a timely manner. The lead for Coordinated Entry in Region 8 is Aspire Indiana. HMIS can be used to produce an unduplicated count of homeless persons, understand patterns of service use, and measure the effectiveness of homeless programs. Domestic Violence providers utilize a separate system to track services to maintain confidentiality of those served.

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

Table 2 – Agencies, groups, organizations who participated

1	<b>Agency/Group/Organization</b>	Family Promise of Hamilton County
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Organization Active in Disaster (COAD) Zoom meeting. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.
3	<b>Agency/Group/Organization</b>	Noblesville Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing Service-Fair Housing

	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Organization Active in Disaster (COAD) Zoom meeting. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.
4	<b>Agency/Group/Organization</b>	ASPIRE INDIANA, INC.
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities Services-homeless Services-Health Services - Victims Regional organization Mental Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Organization Active in Disaster (COAD) Zoom meeting. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.
5	<b>Agency/Group/Organization</b>	Heart and Soul Clinic
	<b>Agency/Group/Organization Type</b>	Services-Health Health Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Organization Active in Disaster (COAD) Zoom meeting. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.
6	<b>Agency/Group/Organization</b>	Shepherd's Center of Hamilton County
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Organization Active in Disaster (COAD) Zoom meeting. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.
7	<b>Agency/Group/Organization</b>	MEALS ON WHEELS OF HAMILTON COUNTY
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Persons with Disabilities Food Insecurity
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Organization Active in Disaster (COAD) Zoom meeting. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.
8	<b>Agency/Group/Organization</b>	JANUS DEVELOPMENTAL SERVICES, INC
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Organization Active in Disaster (COAD) Zoom meeting. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.
9	<b>Agency/Group/Organization</b>	Hamilton County Emergency Management
	<b>Agency/Group/Organization Type</b>	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis Emergency Management
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Organization Active in Disaster (COAD) Zoom meeting. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.
13	<b>Agency/Group/Organization</b>	PRIMELIFE ENRICHMENT, INC.
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Transportation

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Organization Active in Disaster (COAD) Zoom meeting. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.
17	<b>Agency/Group/Organization</b>	TRINITY FREE CLINIC
	<b>Agency/Group/Organization Type</b>	Services-Health Health Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Organization Active in Disaster (COAD) Zoom meeting. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.

18	<b>Agency/Group/Organization</b>	Good Samaritan Network
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless Service-Fair Housing Regional organization Planning organization Crisis Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Hamilton County Housing Collaborative Zoom Meeting. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.

19	<b>Agency/Group/Organization</b>	HAND, Inc.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Hamilton County Housing Collaborative Zoom Meeting. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.
21	<b>Agency/Group/Organization</b>	Old National Bank
	<b>Agency/Group/Organization Type</b>	Business Leaders Business and Civic Leaders Private Sector Banking / Financing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Hamilton County Housing Collaborative Zoom Meeting. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.
22	<b>Agency/Group/Organization</b>	PREVAIL, INC.
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Hamilton County Housing Collaborative Zoom Meeting. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.
24	<b>Agency/Group/Organization</b>	City of Carmel
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Other government - Local

	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment  Homeless Needs - Chronically homeless  Homeless Needs - Families with children  Homelessness Needs - Veterans  Homelessness Needs - Unaccompanied youth  Homelessness Strategy  Non-Homeless Special Needs  HOPWA Strategy  Market Analysis  Economic Development  Anti-poverty Strategy  Lead-based Paint Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Phone calls with Community Leaders/Broad Community. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.</p>
25	<p><b>Agency/Group/Organization</b></p>	<p>City of Fishers</p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Services - Broadband Internet Service Providers  Services - Narrowing the Digital Divide  Other government - Local  Civic Leaders  Business and Civic Leaders</p>

	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment  Homeless Needs - Chronically homeless  Homeless Needs - Families with children  Homelessness Needs - Veterans  Homelessness Needs - Unaccompanied youth  Homelessness Strategy  Non-Homeless Special Needs  HOPWA Strategy  Market Analysis  Economic Development  Anti-poverty Strategy  Lead-based Paint Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Phone calls with Community Leaders/Broad Community. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.</p>
26	<p><b>Agency/Group/Organization</b></p>	<p>City of Noblesville</p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Services - Broadband Internet Service Providers  Services - Narrowing the Digital Divide  Other government - Local  Civic Leaders  Business and Civic Leaders</p>

	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment  Homeless Needs - Chronically homeless  Homeless Needs - Families with children  Homelessness Needs - Veterans  Homelessness Needs - Unaccompanied youth  Homelessness Strategy  Non-Homeless Special Needs  HOPWA Strategy  Market Analysis  Economic Development  Anti-poverty Strategy  Lead-based Paint Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Phone calls with Community Leaders/Broad Community. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.</p>
27	<p><b>Agency/Group/Organization</b></p>	<p>City of Westfield</p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Services - Broadband Internet Service Providers  Services - Narrowing the Digital Divide  Other government - Local  Civic Leaders  Business and Civic Leaders</p>



	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment  Homeless Needs - Chronically homeless  Homeless Needs - Families with children  Homelessness Needs - Veterans  Homelessness Needs - Unaccompanied youth  Homelessness Strategy  Non-Homeless Special Needs  HOPWA Strategy  Market Analysis  Economic Development  Anti-poverty Strategy  Lead-based Paint Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Phone calls with Community Leaders/Broad Community. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.</p>
28	<p><b>Agency/Group/Organization</b></p>	<p>HAMILTON COUNTY</p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Other government - County  Civic Leaders  Business and Civic Leaders</p>

	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment  Homeless Needs - Chronically homeless  Homeless Needs - Families with children  Homelessness Needs - Veterans  Homelessness Needs - Unaccompanied youth  Homelessness Strategy  Non-Homeless Special Needs  HOPWA Strategy  Market Analysis  Economic Development  Anti-poverty Strategy  Lead-based Paint Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Meetings and phone calls with Community Leaders/Broad Community. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.</p>
29	<p><b>Agency/Group/Organization</b></p>	<p>Hamilton County Township Trustees</p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Other government - County  Civic Leaders  Business and Civic Leaders</p>

<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment  Homeless Needs - Chronically homeless  Homeless Needs - Families with children  Homelessness Needs - Veterans  Homelessness Needs - Unaccompanied youth  Homelessness Strategy  Non-Homeless Special Needs  HOPWA Strategy  Market Analysis  Economic Development  Anti-poverty Strategy  Lead-based Paint Strategy</p>
<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Phone calls with Community Leaders/Broad Community. Presented information about the CDBG Program and the Annual Action Plan. Presented information and updates on the timeline for the Action Plan and the timeline for the CDBG Application process. Presented updates on the Pre-Application and Application process and upcoming due dates. Answered questions and addressed concerns as they were presented.</p>

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

The consultation process continued throughout the year as Hamilton County continued to grapple with the effects of and respond to the COVID-19 pandemic. Efforts were made to include every type of stakeholder has been contacted for consultation.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

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

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

**Narrative (optional)**

In March 2020 a group of nonprofits and semi-governmental units began meeting to develop solutions for the housing crisis created by the COVID-19 pandemic. Through their partnership with each other and funding from the United Way of Central Indiana C-CERF and the Hamilton County Commissioners, they were able to help families pay rent and mortgages as jobs were lost through 2020. As new federal programs became available in 2021, this core group of innovators expanded the Hamilton County Housing Collaborative to engage the full community in developing solutions to Hamilton County’s housing challenges. The group as set a goal to create a proposal for Hamilton County that provides a strategic and realistic approach to improving the continuum of attainable housing options for the county that leverages all funding opportunities. The visioning document for the group, dated 6/2021, outlines several attributes that will be a part of the proposal.

- Conduct a new housing needs study to better understand the housing needs for the long term, create meaningful measurements of success and developing data points that can be monitored.
- Focus on more attainable housing options for households making less than 120% AMI, focusing even further to create more attainable housing for households earning between 0-80% AMI.
- Creating resiliency in Hamilton County’s housing stock by providing more diversity in building, increasing density to appropriate levels, and creating more housing, at more price points.

- Demonstrate a caring community be tackling housing issues for those living in poverty in a collective manner, increasing the impact felt by these households over current efforts.
- Create opportunities for families to move into housing that meets their needs, regardless of their season of life.

A copy of this visioning document has been included as an appendix to this Action Plan for further information.

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

### 1. Summary of citizen participation process/Efforts made to broaden citizen participation

#### Summarize citizen participation process and how it impacted goal-setting

Hamilton County began the 2021 Action Plan process in late spring. However, much of the public input and consultations continued through the year because of the need to respond to the COVID-19 pandemic with the CARES Act funding. Hamilton County started the process later than normal to allow the community to emerge from the large winter waive of COVID-19 cases and determine how the re-opening of the local economy would be impacted. The first public meeting was held on June 16, 2021 in the Green Room at Federal Hill Commons in Noblesville, Indiana. A second public hearing is to be held on July 22, 2021 to present the 2021 Action Plan. Comments from the public will be incorporated in the final draft of this document.

#### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	Held a meeting on June 16, 2021. In addition to staff, 5 people attended, and written comments were submitted by 2 additional people who were not in attendance.	Comments will be incorporated in the final draft.	Comments will be incorporated in the final draft.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Non-targeted/broad community	Hamilton County Commissioners reviewed the applications and recommendations from staff for PY 2021 CDBG Funding. The Commissioners approved the recommendations. June 28, 2021	Hamilton County did not receive any comments.	Hamilton County did not receive any comments.	
3	Thirty-Day Comment Period	Non-targeted/broad community	Thirty-day comment period for the Action Plan. Posted to the Hamilton County Website. July 1, 2021 through July 30, 2021.			
4	Public Meeting	Non-targeted/broad community	Second public meeting on the 2021 Action Plan, including final projects selected for funding. The meeting to be held virtually. July 22, 2020 at 2:30 pm.			

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

Annual CDBG allocations are determined based on a variety of factors including the poverty rates, population size and growth rates, and housing conditions such as the age of the housing stock and other housing problems such as overcrowding. Programs and projects must benefit low to moderate-income households, individuals or neighborhoods with high percentage of low to moderate-income residents. Hamilton County will receive an allocation of \$1,092,260 for fiscal year 2021.

As required by HUD Notice “CPD-19-04” the City of Carmel, Fishers, Westfield and Noblesville, must officially notify the Commissioners of Hamilton County and the U.S. Department of Housing and Urban Development (HUD) Indianapolis field office that they wish to work with Hamilton County under a joint agreement to participate in the “Urban County” program for Federal Fiscal Years 2019-2021. The towns of Atlanta, Arcadia, Cicero and Sheridan have “opted out” of the Hamilton County CDBG program in prior years, meaning the CDBG funding from the county may not be spent within those areas. Persons or organizations wanting to receive a grant to serve any of these communities must seek assistance through the Balance of State program with the State of Indiana, Indiana Housing and Community Development Authority. In July 2020, Hamilton County began the process of renewing the joint agreement was extended to cover Fiscal Years 2019-2021. Hamilton County has been able to and continues to operate



under the prior fiscal year joint agreements.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public – federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,092,260	0	216,453.13	1,308,713.13	2,184,520	Funding will be used for the public services, infrastructure development and supporting housing development for extremely low-income, low income and low-moderate income households.

**Table 1 - Expected Resources – Priority Table**

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

Hamilton County does not require projects to meet any match requirements. However, many of the projects and programs with large budgets that are partially funded with CDBG dollars, they will naturally require other funds. The largest awards are generally for each of the four cities, Carmel, Fishers, Noblesville and Westfield to use towards public infrastructure projects.

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

Hamilton County does not have plans to utilize publicly owned property to address the needs in the plan.

**Discussion**

As previously discussed in this Action Plan, Hamilton County began the planning process and public input process in early 2021, and it was really a continuation of planning efforts from Spring 2020 when the COVID-19 pandemic began affecting this community. Due to the extra needs brought on by COVID-19, many of the needs of the community's most vulnerable residents were exacerbated by job loss, creating a demand for health care, increasing food insecurity, and mounting rental assistance needs.

This Action Plan has not allocated all the CDBG resources to projects and has set aside a portion for affordable housing developments. Hamilton County has always tried to focus efforts on affordable housing, but as the community emerges from the COVID-19 pandemic, the need for such projects has greater support from residents and elected officials. Hamilton County will utilize the next year to build on this momentum of support to seek out affordable housing developments in need of this type of subsidy.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2019	2023	Affordable Housing	County wide	Affordable Housing	CDBG: \$584,856.13	Rental Housing Added: 22 Household Housing Units
2	Public Infrastructure and Facility Improvements	2019	2023	Non-Homeless Special Needs Non-Housing Community Development	City of Fishers City of Carmel City of Noblesville City of Westfield	Public Infrastructure and Facility Improvement	CDBG: \$426,906	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: Approximately 400 Persons Assisted
3	Homeless Assistance	2019	2023	Homeless	County wide	Homeless Assistance	CDBG: \$68,500	Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted
4	Administration and Planning	2019	2023	Administration and Planning	County wide	Administration and Planning	CDBG: \$218,452	Other: 1 Other

Table 2 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Affordable Housing
	<b>Goal Description</b>	Development of affordable housing projects, with priority given to projects that create housing affordable to households earning incomes less than 80 percent of the area median income.
2	<b>Goal Name</b>	Public Infrastructure and Facility Improvements
	<b>Goal Description</b>	Public service activities other than Low/Moderate Income Housing Benefit or infrastructure improvements: number of persons assisted to be determined depending on the projects and locations of those selected projects. Fund infrastructure projects in the Cities of Carmel, Fishers, Noblesville and Westfield.
3	<b>Goal Name</b>	Homeless Assistance
	<b>Goal Description</b>	Services and assistance for households experiencing or at-risk of homelessness: 250 individuals Fund projects in 2021: Family Promise of Hamilton County and Prevail, Inc.
4	<b>Goal Name</b>	Administration and Planning
	<b>Goal Description</b>	Overall administration of the CDBG program and affirmatively furthering fair housing.

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

Adhering to the CDBG program’s national objectives, priority will be given to projects that address the housing and community development needs of low- and moderate-income persons.

Noblesville Housing Authority staff reviewed the proposals from public service agencies and public infrastructure proposals from Carmel, Fishers, Noblesville and Westfield to ensure eligibility for CDBG funding. The Noblesville Housing Authority sends recommendations and copies of the applications to the Hamilton County Commissioners for discussion and final approval. The following are projects have been selected for 2021 program year.

### Projects

#	Project Name
1	Administration and Fair Housing
2	Carmel Infrastructure
3	Fishers Infrastructure
4	Noblesville Infrastructure
5	Westfield Infrastructure
6	Family Promise of Hamilton County
7	Prevail, Inc.
8	Hamilton County
9	Family Promise of Hamilton County

Table 3 - Project Information

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

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

the Noblesville Housing Authority request for proposal process each year.

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

With limited resources, projects in 2021 were selected based on several factors:

- Meeting an eligible activity and national objective outlined by HUD.
- Meeting a goal and strategy of the 2019-2023 Consolidated Plan.
- Leveraging other resources to maximize impact.
- Address a need created by the COVID-19 pandemic.
- Capacity to provide the project and utilize federal funds.

## **AP-38 Project Summary**

### **Project Summary Information**

1	<b>Project Name</b>	Administration and Fair Housing
	<b>Target Area</b>	County wide
	<b>Goals Supported</b>	Administration and Planning
	<b>Needs Addressed</b>	Administration and Planning
	<b>Funding</b>	CDBG: \$218,452
	<b>Description</b>	The Noblesville Housing Authority will provide Administrative and Fair Housing services for the PY2021 Hamilton County, IN CDBG program. NHA will provide overall program management and oversee all program design and implementation of activities of sub-recipients and contracted services. This project is eligible under 24 CFR Part 570.206 (a).
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The activity will benefit one organization, the Noblesville Housing Authority. It will fund administration activities and fair housing workshops.
	<b>Location Description</b>	Noblesville Housing Authority, 320 Kings Ln, Noblesville, IN 46060
	<b>Planned Activities</b>	Noblesville Housing Authority will provide overall program management and oversee all program design and implementation activities of sub-recipients and contracted services. Funding will also be used to fund fair housing promotion and education activities.
2	<b>Project Name</b>	Carmel Infrastructure
	<b>Target Area</b>	City of Carmel
	<b>Goals Supported</b>	Public Infrastructure and Facility Improvements
	<b>Needs Addressed</b>	Public Infrastructure and Facility Improvement
	<b>Funding</b>	CDBG: \$144,922
	<b>Description</b>	The City of Carmel will use CDBG funds to fund eligible infrastructure activities. A final location for the project is yet to be determined. The city will use CDBG funding to provide infrastructure improvements in eligible census tracts; the specific project(s) have yet to be determined. Proposed activities shall be eligible under 24 CFR 570.201 (c) and will have a low to moderate income area benefit.
	<b>Target Date</b>	9/30/2022



	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will benefit approximately 100 Hamilton County residents.
	<b>Location Description</b>	All work will take place in an eligible Census Tract yet to be determined.
	<b>Planned Activities</b>	The City of Carmel will use CDBG funds toward an eligible infrastructure project in an eligible area.
<b>3</b>	<b>Project Name</b>	Fishers Infrastructure
	<b>Target Area</b>	City of Fishers
	<b>Goals Supported</b>	Public Infrastructure and Facility Improvements
	<b>Needs Addressed</b>	Public Infrastructure and Facility Improvement
	<b>Funding</b>	CDBG: \$136,666
	<b>Description</b>	The City of Fishers will use CDBG funds to fund eligible infrastructure activities. A final location for the project is yet to be determined. The city will use CDBG funding to provide infrastructure improvements in eligible census tracts; the specific project(s) have yet to be determined. Proposed activities shall be eligible under 24 CFR 570.201 (c) and will have a low to moderate income area benefit.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will benefit approximately 100 Hamilton County residents.
	<b>Location Description</b>	All work will take place in an eligible Census Tract yet to be determined.
	<b>Planned Activities</b>	The City of Fishers will use CDBG funds toward an eligible infrastructure project in an eligible area.
<b>4</b>	<b>Project Name</b>	Noblesville Infrastructure
	<b>Target Area</b>	City of Noblesville
	<b>Goals Supported</b>	Public Infrastructure and Facility Improvements
	<b>Needs Addressed</b>	Public Infrastructure and Facility Improvement
	<b>Funding</b>	CDBG: \$92,728

	<b>Description</b>	The City of Noblesville will use CDBG funds to fund eligible infrastructure activities. A final location for the project is yet to be determined. The city will use CDBG funding to provide infrastructure improvements in eligible census tracts; the specific project(s) have yet to be determined. Proposed activities shall be eligible under 24 CFR 570.201 (c) and will have a low to moderate income area benefit.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will benefit 100 Hamilton County residents.
	<b>Location Description</b>	All work will take place in an eligible Census Tract yet to be determined.
	<b>Planned Activities</b>	All work will take place in an eligible Census Tract yet to be determined.
5	<b>Project Name</b>	Westfield Infrastructure
	<b>Target Area</b>	City of Westfield
	<b>Goals Supported</b>	Public Infrastructure and Facility Improvements
	<b>Needs Addressed</b>	Public Infrastructure and Facility Improvement
	<b>Funding</b>	CDBG: \$62,589
	<b>Description</b>	The City of Westfield will use CDBG funds to fund eligible infrastructure activities. A final location for the project is yet to be determined. The city will use CDBG funding to provide infrastructure improvements in eligible census tracts; the specific project(s) have yet to be determined. Proposed activities shall be eligible under 24 CFR 570.201 (c) and will have a low to moderate income area benefit.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will benefit approximately 100 Hamilton County residents.
	<b>Location Description</b>	All work will take place in an eligible Census Tract yet to be determined.
	<b>Planned Activities</b>	The City of Westfield will use CDBG funds toward an eligible infrastructure project in an eligible area.
6	<b>Project Name</b>	Family Promise of Hamilton County
	<b>Target Area</b>	County wide

	<b>Goals Supported</b>	Homeless Assistance
	<b>Needs Addressed</b>	Homeless Assistance
	<b>Funding</b>	CDBG: \$58,500
	<b>Description</b>	Family Promise of Hamilton County will provide wrap-around case management services for households in Hamilton County experiencing homelessness or at-risk of homelessness. CDBG funding will be utilized for the reimbursement of wages and programming expenses. This project is eligible under 24 CFR 570.201 (e) and will have a low to moderate income clientele benefit.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will serve 80 people/20 households.
	<b>Location Description</b>	PO Box 2073, Noblesville, IN 46061
	<b>Planned Activities</b>	Reimbursement of wages and programing expenses for Family Promise Lead Family Advocate, Assistant Family Advocate, and Executive Director
7	<b>Project Name</b>	Prevail, Inc.
	<b>Target Area</b>	County wide
	<b>Goals Supported</b>	Homeless Assistance
	<b>Needs Addressed</b>	Homeless Assistance
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	Prevail provides supportive services to victims of crime and abuse including men, women, and children. Services include information, referrals, support groups, employment assistance, and financial literacy programs. CDBG funding will be utilized for the reimbursement of eligible administrative costs.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	170 individuals
	<b>Location Description</b>	Noblesville, IN. Location suppressed due to the nature of the program.

	<b>Planned Activities</b>	Project Salaries (Self Sufficiency Advocate), Advocate , Database & Reporting Coordinator, and Director of Mission Achievement
8	<b>Project Name</b>	Hamilton County
	<b>Target Area</b>	County wide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$84,856.13
	<b>Description</b>	CDBG funds will be used for the reimbursement for the cost of land acquisition for the future development of affordable housing.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	22 Units
	<b>Location Description</b>	Various addresses, yet to be determined.
	<b>Planned Activities</b>	Funding available to complete affordable housing for future projects yet to be determined. Hamilton County is actively looking for affordable housing projects. Funds could be used for infrastructure for a development, land acquisition or renovation of affordable housing.
9	<b>Project Name</b>	Family Promise of Hamilton County
	<b>Target Area</b>	County wide
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$500,000
	<b>Description</b>	CDBG funds will be used for the reimbursement for the cost of land acquisition for the future development of affordable housing.
	<b>Target Date</b>	9/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	30 Units
	<b>Location Description</b>	Cooper Commons Court

<b>Planned Activities</b>	Family Promise is a joint Low Income Housing Tax Credit applicant with a developer who is proposing to develop affordable housing on Cooper Commons Court in Noblesville.
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## AP-50 Geographic Distribution – 91.220(f)

### Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Hamilton County has an exception, allowing it to target funds in areas where at least 37.83 percent of households in an area are moderate-income households. This percentage changes from year to year, but generally holds between 30-33 percent. For 2021, any target area must have 37.83 percent of the population earning 80 percent of the area median income or lower. Traditionally, the rule for CDBG funds is that an area must have at least 51 percent of the households earn less than 80 percent of the area income. Due to the high levels of wealth in Hamilton County, this exception was granted.

### Geographic Distribution

Target Area	Percentage of Funds
Eligible Township Census Tracts	
County wide	67
City of Fishers	10
City of Carmel	11
City of Noblesville	7
City of Westfield	5

Table 4 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

While the individual Cities will utilize their funds in census tracts where at least 37.83 percent of the households are low to moderate income, the majority of the CDBG funds will be utilized county-wide.

### Discussion

Targeting areas where low to moderate-income individuals reside is important to CDBG funded program. Projects can indirectly benefit many people, increasing beneficiaries per dollar spent or invested. In Hamilton County, this can prove difficult with 16 percent of the wealthiest households in the State of Indiana living within its borders. Many low to moderate-income households live in and among the larger homes that cover Hamilton County's metropolitan areas or along the fringes of the urban areas.

## Affordable Housing

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

#### Introduction

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

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	22
Special-Needs	0
Total	22

**Table 6 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	22
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	22

**Table 7 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

Hamilton County has set aside a large portion of funding for affordable housing initiatives in the coming year, although no specific project has been selected. Two projects have applied for funding to develop affordable rental housing. Timing of the projects are dependent on other funding resources, such as the Indiana Housing and Community Development Authority, Affordable Housing Programs from the Federal Home Loan Bank of Indiana and Low-Income Tax Credits. Because of the size and scope of these projects, it takes multiple years to plan the project before development can begin. Hamilton County may invest in these projects once more of the details and plans have been finalized.

In response to the COVID-19 pandemic Hamilton County was allocated \$1,693,665 in CARES Act funding

as part of its program year 2019 Action Plan. Of this funding award, Hamilton County chose to allocate \$400,000 to rent, utility and burial assistance related the COVID-19 pandemic. Due to the allocation of \$10 million in Emergency Rental Assistance program funds for rent and utility assistance awarded through the U.S. Treasury, the township trustees elected to forego \$141,428 of their funds to be allocated to affordable housing projects.



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

### **Introduction**

The NHA is the public housing agency for Hamilton County. NHA does not own or manage any public housing units. The Noblesville Housing Authority administers Section 8 Housing Choice Vouchers, a tenant based rental program to low-income households.

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

The most immediate need for the NHA is finding additional funding to provide voucher assistance. Noblesville Housing Authority currently administers 192 local vouchers, and 41 vouchers for households who have ported their vouchers from other housing authorities. The other housing authorities continue to hold those vouchers and NHA bills them for the monthly housing assistance payments. The waiting list is currently closed. The waiting list was last opened from December 2nd to 11th, 2020, during which time 868 applications were received. Turnover of vouchers is slow as most households do not “graduate” from needing a subsidy. Most voucher holders are elderly and disabled, returning their voucher when they cannot live independently or pass away. Given the limited number of vouchers administered and the low turnover among households receiving this rental assistance subsidy, the NHA selected only 200 applicants from the applicant pool based on local preferences and a lottery system to add to the waiting list. Preferences include applicants who live or work in Hamilton County (1000 points); applicants live or work in and surrounding county (Boone, Clinton, Hancock, Madison, Marion, or Tipton County, Indiana) (400 points); applicants whose head or co-head of household is elderly (age 62 or older) (200 points); applicants whose head or co-head of household is disabled (200 points); and applicants who are veterans or surviving spouses of veterans (50 points). There are currently 223 households on the waiting list including 64 that have at least one household member with a disability, 46 of whom are elderly households, and 114 of whom are families with children.

Additionally, approximately 65 percent (145 households) are extremely low-income, 32 percent (71 households) are very low income, .01 percent (3 households) are low income. Demand for new vouchers has increased with the cost burden of housing in Hamilton County increasing for many families, including the elderly.

In 2020, NHA was approved for up to 25 additional vouchers called FYI vouchers for eligible former Foster Care Youth applicants. The applicants must be at risk of homelessness, be between the ages of 18 and 23, and be referred to NHA through the Indiana Department of Child Services. So far only one participant has been housed through the FYI program, but NHA is actively seeking additional referrals. There is a possibility that

HUD may be reallocating vouchers from other housing authorities that have been unable to fully utilize their vouchers. NHA is actively pursuing any and all opportunities to increase their number of vouchers.

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

The NHA does not manage public housing units. The NHA does however administer a Section 8 Housing Choice Voucher program, a tenant based rental assistance program. Voucher participants are provided information about service programs near the housing of their choosing. All participants are invited to join the Resident Advisory Board, and their primary function is to provide input on the housing authority 5 year plans.

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

The Noblesville Housing Authority is not designated as troubled.

**Discussion**

The most immediate need for the NHA is finding additional funding to provide voucher assistance. Turnover of vouchers is low which may be in part because the majority of voucher holders are seniors or disabled households many of whom never “graduate” from needing a subsidy, though this is partly due to the lack of non-subsidized affordable housing options in the county. Demand for one-bedroom units is particularly great among applicants for rental assistance through the NHA. Many of the residents are single-person households and there is a limited supply of affordable one-bedroom units in the market, particularly non age-restricted one-bedroom units. ADA accessible units and ground floor units are also in high demand, in part because of the limited supply of these units. As noted in the public input section, many long-term residents in Hamilton County are being squeezed out of the housing market with rising prices. Absent rental assistance, many extremely low to low income families cannot afford to rent in Hamilton County.

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

### **Introduction**

Hamilton County currently has one emergency shelter for individuals (Third Phase) as well as temporary housing for families (Family Promise of Hamilton County). The lack of a domestic violence shelter in Hamilton County has been identified as a high priority need among stakeholders and members of the general public. While there is no domestic violence shelter in the county, residents of Hamilton County are served by the shelter in neighboring Anderson operated by Alternatives of Madison County, Inc. Finally, there are a series of organizations including Township Trustees and private organizations that provide emergency housing and utility assistance.

With the amount of wealth in Hamilton County, homelessness is a hidden and misunderstood issue in the community. The 2020 Point in Time Count, held on a single day in January 2020, shows there were 22 individuals experiencing homelessness in Hamilton County. All of them were over the age of 18 years, 4 between the age of 18 and 24 and the rest over the age of 24. Two of the homeless individuals qualify as chronically homeless. Chronic homelessness is used to describe people who have experienced homelessness for at least a year — or repeatedly — while struggling with a disabling condition such as a serious mental illness, substance use disorder, or physical disability.

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

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

The Indiana Balance of State Continuum of Care includes 91 of the 92 counties in the state. These 91 counties are divided into 16 regions and each region is overseen by a regional planning council and chairperson. Hamilton County is part of Region 8 in the Indiana Balance of State CoC along with Boone,

Hendricks, Madison, and Hancock Counties. The Region 8 CoC works with a variety of providers in Hamilton County including, but not limited to: GSN, Prevail, Township Trustee offices, Third Phase, Family Promise, Aspire Indiana, Community Corrections, and the Noblesville Housing Authority. While there are no specific CoC goals for the upcoming year, the CoC will continue to work with local service providers to address the needs of the homeless in the county.

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

There are two projects funded by Hamilton County in PY21 to help address some of the homeless and near homeless individuals in Hamilton County. They are:

*Family Promise of Hamilton County* is receiving \$58,500 of CDBG funding to provide case management and program services for families in need of temporary housing and other related services to Hamilton County.

*Prevail, Inc* is receiving \$10,000 of CDBG funding to provide crisis intervention services including information and referrals, safety planning, protective order assistance, and intake needs assessment will be provided to victims of domestic violence.

Hamilton County, the Region 8 Planning Council, and the Good Samaritan Network are working together to develop an emergency shelter for domestic violence victims. This will be the second emergency shelter to serve Hamilton County and the first to serve a subpopulation of the homeless population. Private and public partners are working together to find funding resources to match Community Development Block Grant dollars for the development. One private partner with experience in operating a shelter, Alternatives from Anderson, has already come forward as a potential group to run the shelter.

### **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**

Currently there are no permanent supportive housing units provided in the county and the development of these units will face all of the aforementioned barriers to the provision of affordable housing in the county. As such, continued support for both organizations and service providers who provide emergency assistance as well as those that provide general permanent affordable housing opportunities, as well as promotion of

increased collaboration and cooperation between these organizations, will continue to be an important strategy for the county.

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

Limited financial resources prohibit the Hamilton County from supporting any one project or program with a significant amount of funds. Hamilton County is normally restricted to utilizing 15 percent or less of its annual allocation towards public services. However, for PY 2021, HUD has granted an exception or waiver to that regulation.

One goal identified in this Consolidated Plan is to support programs that help the most vulnerable households achieve self-sufficiency including additional case management services. Public service programs such as case management services, food pantries, legal services, health services, childcare, transportation and fair housing will be funded under this goal in the next five years.

## **Discussion**

During PY21, Hamilton County can fund Family Promise of Hamilton County at a higher level because it still has portions of the Cares Act funding available for allocation. The allocations for the CARES Act have been finalized in the PY2019 Action Plan. Two of the projects that will receive remaining CARES Act funding to prevent homelessness are:

- \$34,000 to GSN to provide food transportation services; and,
- \$31,456 to Meals on Wheels to provide food assistance to seniors and disabled adults.

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

### **Introduction:**

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

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

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

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

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

with new developments

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

### **Discussion:**

Traditional redevelopment has been led by small non-profit community development organizations at the grass roots level. Smaller organizations are unable to build large-scale projects. They are also unable to be holistic in nature which limits their impact on the target population.

In November 2019, IHCDA announced a funding commitment for their “Moving Forward” program to Old Town Companies and Merchants Affordable Housing Corp. for a 168-unit mixed income housing development that will incorporate accessible design, adaptive technology, and smart home technology. Plans include 40 one-bedroom units for very-low income individuals with Intellectual/Developmental Disabilities (IDD). Another affordable housing development is under construction with plans to open in fall of 2021 is SouthPointe Village in Fishers. SouthPointe Village will include 62 apartments 1- and 2-bedroom units, with 13 of them set aside for residents who are intellectually or developmentally disabled.

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

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

### **Introduction:**

With the challenges facing the Hamilton County community living at or close to the poverty level, Hamilton County has developed some general goals to offer flexibility in programming for all communities and increase the coordination among service providers. Under each goal is a list of priorities and strategies that will meet needs of communities in both the northern and southern parts of the community.

Hamilton County will utilize the bulk of the Community Development Block Grant to address the general community development needs. The primary use of these funds will be to upgrade infrastructure in the community.

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

The major obstacle for meeting the needs of underserved communities in the county is a lack of funding. Each year the NHA receives many more eligible and qualified requests for funding than CDBG funds. To overcome this obstacle the NHA encourages collaborative efforts to minimize duplication and increase efficiency.

Hamilton County offers a competitive funding application process for service and housing providers. CDBG funding for programs is directed to programs and projects that meet the following criteria:

- Meeting an eligible activity and national objective outlined by HUD.
- Meeting a goal and strategy of the 2019-2023 Consolidated Plan.
- Leveraging other resources to maximize impact.
- Address a need created by the COVID-19 pandemic.
- Capacity to provide the project and utilize federal funds.

Activities and projects that meet all the above criteria receive the highest priority, reducing the amount of funding spent on programs or projects that do not meet the underserved communities and households.

During PY21, Hamilton County will fund Family Promise of Hamilton County and Prevail, Inc.

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

On June 24, 2020, the State of Indiana announced a rental relief fund to assist low to moderate income households impacted by job loss due to COVID-19. The money comes from the CARES Act and will cover 91 counties and about 12,000 households. Knowing the demand for rental assistance will exceed the supply



of funding at the state level, many local governments, including Hamilton County, are funding such programs. In program year 2019 Action Plan, Hamilton County funded the Hamilton County Trustees with rental assistance under the CARES Act. The program was designed to assist families so that they will not be faced with eviction, loss of shelter or socio-economic displacement. The PY2020 year-end report, or CAPER, will give the final tallies of those assisted with rental assistance.

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

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

Whenever Hamilton County funds a housing rehabilitation project with CDBG funds, the work will be done in compliance with the Environmental Protection Agency's lead-based paint rules and regulations. Hamilton County funded a repair program through its FY2020 Action Plan, which will continue through fiscal year 2021. The Home Repair Program is a partnership between HAND, Habitat, and Shepherd's Center. Home repairs range from minor (widening doorways, adding ramps, and installing grab bars) to major (roofs, windows, doors, and HVAC). Any repair involving more than \$5,000 of repairs will require the agencies to comply with lead-based paint rules and regulations, reducing hazards for young Hamilton County residents.

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

Tackling poverty is one of the most important factors in reducing social exclusion and improving the lives of residents. This strategy is crucial for demonstrating the Noblesville Housing Authority's commitment to tackling poverty. The Noblesville Housing Authority, in partnership with the social service and housing provider community, will strive for the goals and strategies below to help households stay out of poverty or become self-sufficient and elevate themselves from living in poverty.

- Promote economic empowerment by supporting facilities, services and activities aimed at developing the self-sufficiency for all low to moderate-income residents. Programs and activities to be supported over the next five years include: Transportation services, child care services, healthcare, food banks
- Provide affordable housing opportunities to low and moderate-income households. Support the development of housing for extremely low income households, particularly those earning less than 30 percent of the area median income. Develop a funding resource for households that do not meet the

HUD income requirements but are at-risk of losing their housing.

- Continue to work with local agencies to identify barriers and issues related to poverty and support programs that will help low to moderate-income households overcome those barriers.

During the coming year, the Hamilton County CARES Act program will provide \$31,456 to Meals on Wheels to provide food to homebound seniors.

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

Through administrative efforts and partnerships in the community, the NHA continues its work to increase coordination across Hamilton County, with the intended outcome of improving services for low-income households. In the past, Hamilton County has worked closely with the GSN is to provide an outlet for this coordination and capacity building. With the COVID-19 pandemic, even more organizations have come together to discuss the needs of the most vulnerable residents in the community how best to respond to those needs. These coalitions are the Hamilton County Housing Collaborative and the Community Organization Active in Disaster. New types of organizations participating include the local tourism association, youth specific organizations, private businesses, emergency management, Veterans Affairs, and other civic leaders.

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

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

The GSN is the primary way to connect all service providers throughout Hamilton County. The Hamilton County CDBG program wants 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 affordable housing providers and the Region 8 Planning Council for the Indiana Continuum of Care. By connecting the three different organizations, planning efforts will be more streamlined and projects developed from those efforts will go more to address the households and individuals with the most need.

### **Discussion:**

Hamilton County certifies it will affirmatively further fair housing choice by conducting an analysis of impediments to fair housing choice, take appropriate actions to overcome the effects of any impediments

identified, and maintain records reflecting the analysis and actions taken in this regard. The County is committed to ensuring fair housing choice for all residents within its jurisdiction.

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

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

Hamilton County, as a recipient of federal CDBG, must take appropriate actions to overcome the effects of the impediments identified within this plan and maintain records reflecting the analysis and actions taken. Over the next year the Noblesville Housing Authority will:

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

## **Program Specific Requirements**

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

#### **Introduction:**

Community Development Block Grant funds are the only funding resource Hamilton County anticipates for program year 2021. Hamilton County will utilize its current year allocation to fund projects as well as \$216,453.13 from prior year allocations and projects that did not utilize all of their funds. The prior year allocations to be used are:

- \$61,238.24 from PY20;
- \$136,453.13 from PY19; and,
- \$18,761.76 from PY18.

### **Community Development Block Grant Program (CDBG)**

#### **Reference 24 CFR 91.220(l)(1)**

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

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

### **Other CDBG Requirements**

- |                                                                                                                                                                                                                                                                                                                                                                                                   |         |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|
| 1. The amount of urgent need activities                                                                                                                                                                                                                                                                                                                                                           | 0       |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. |         |
|                                                                                                                                                                                                                                                                                                                                                                                                   | 100.00% |

**Discussion**

Hamilton County will fund projects in PY21 that address the needs outlined in the Consolidated Plan with its CDBG dollars. After subtracting administration from the total allocation, 100 percent of the 2021 CDBG funding will benefit low to moderate income individuals. Hamilton County utilizes a three-year certification, covering fiscal years 2019, 2020, and 2021.