State of Indiana
2013 Action Plan

For allocation of
CDBG, HOME, ESG and HOPWA

FINAL REPORT

Final Report

May 15, 2013

State of Indiana 2013 Action Plan

Prepared for

State of Indiana
Indiana Office of Community and Rural Affairs
Indiana Housing and Community Development Authority
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2013 Annual Action Plan

CDBG, HOME, ESG, HOPWA

Executive Summary

ES-05 Executive Summary

1. Introduction

Each year the State of Indiana is eligible to receive grant funds from the U.S. Department of Housing and Urban Development (HUD) to help address housing and community development needs statewide. These grant funds include: Community Development Block Grants (CDBG), Emergency Solutions Grant (ESG), the HOME Investment Partnerships Program (HOME), and Housing Opportunities for People with AIDS (HOPWA). The dollars are primarily meant for investment in the State's less populated and rural areas, which do not receive such funds directly from HUD.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The 2013 Action Plan is the fourth of five program years covered by the State of Indiana 2010-2014 Consolidated Plan. The five-year, top-level goals that guide funding during this planning period include:

Goal 1. Expand and preserve affordable housing opportunities throughout the housing continuum.

Goal 2. Reduce homelessness and increase housing stability for special needs populations.

Goal 3. Promote livable communities and community revitalization through addressing unmet community development needs.

Goal 4. Promote activities that enhance local economic development efforts.

The goals are not ranked in order of importance, since it is the desire of the State to allow each region and locality to determine and address the most pressing needs it faces.

To achieve the goals, the State will use a combination of federal and state funds, and other public and private funds, for project leveraging to address the priority housing and community development needs.

For the eCon Plan Suite, these top level goals have been narrowed into sub-goals, which appear in section SP-45. (These sub-goals are called "objectives" in the 2010-2014 Consolidated Plan). Each sub-goal has "goal outcome," for both the five- and one-year planning period.

3. Evaluation of past performance

OCRA and IHCDA past programs and allocation methods have been successful. Changes in priorities and allocation methods for 2013 were based on local government consultation, data collection and the need to continue having the greatest impact with less funding. For example, for the 2013 program year OCRA has implemented a Section 108 loan program, to provide local governments access to capital that is difficult to obtain privately.

IHCDA allocates funds to meet its four strategic goals: ending long-term homelessness, comprehensive community development, sustainable and affordable housing, individual and family economic stability and aging in place. This is the third year that IHCDA has made these strategic objectives the funding allocation priority of formula grants. Each of the four strategic priorities requires funding from multiple funding sources. For example, to end long-term homelessness, ESG funds will be required to work in coordination with Continuum of Care (CoC) funds to reduce the length of time people experiencing homelessness stay in shelter and reduce recidivism by increasing rental assistance programs funded through CoC funds. Our experience has led the agency to allocate formula grant funds in concert with other funding streams necessary to advance IHCDA's strategic goals.

ESG funding in 2012 was used toward operations, essential services, HMIS and Rapid Rehousing. Many of the ESG Rapid Rehousing agencies had difficulty obtaining match requirement funding, therefore RFPs were increased from three to eight subrecipients. Many agencies also requested homeless prevention as a resource along with rapid rehousing.

Due to installation of a new HMIS system in March 2012, a good performance baseline was not attainable until the system was fully functioning. The State of Indiana hopes to collect a good baseline of performance standards data against the 2012 performance goals. The 2013 ESG RFP will require the subrecipients to work toward their performance goals based upon 2012 performance.

4. Summary of citizen participation process and consultation process

Citizen participation and stakeholder consultation was achieved using three tools:

1. An electronic survey of stakeholders, distributed to more than 1,100 local government officials, nonprofit housing and community development professionals, regional planners, Chambers of Commerce and others in nonentitlement areas of the State;

2. An electronic survey of public housing authorities in nonentitlement areas to gather data on client needs, barriers to housing opportunity and market demand; and

3. A series of regional meetings with local officials, nonprofits, businesses and other stakeholders to discuss regional housing and community development needs and how OCRA and IHCDA programs assist in addressing such needs.

5. Summary of public comments

This section will be updated with a summary of public comments received during the 30-day draft comment period. Many public comments were received during the 30-day draft comment period. The majority of the comments concerned the housing challenges faced by extremely low income residents and persons with disabilities. The comments identified many barriers to housing choice for these groups, including: 1) Lack of affordable housing for persons with SSI income levels; 2) Lack of accessible housing in new construction and renovated housing; 3) Lack of scattered site or dispersed housing; and 4) High rates of housing discrimination.

The public comments contained a number of recommended actions to address these barriers. Copies of all comments are also appended to the Action Plan (screen AD-26).

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

All comments are or will be accepted and are summarized in the Consultation and Participation sections of this Action Plan (see AP-10 and AP-12). Copies of all comments are also appended to the Action Plan (screen AD-26).

7. Summary

Please see above.

PR-05 Lead & Responsible Agencies

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

The lead agencies for completion of the 2013 State of Indiana Action Plan include:

1. The Indiana Office of Community and Rural Affairs (OCRA), which administers CDBG;

2. The Indiana Housing and Community Development Authority (IHCDA), which administers HOME, ESG and HOPWA.

Consolidated Plan Public Contact Information

The primary contact for the 2013 State of Indiana Action Plan is:

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AP-10 Consultation

1. Introduction

This section summarizes the consultation between OCRA and IHCDA and state partners in development of the 2013 Action Plan, as well as during program years.

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

In the year leading up to preparation of the 2013 Action Plan, both OCRA and IHCDA made it a priority to receive input from organizations throughout the state that provide housing and services to the state's lowest income residents and residents with special needs. OCRA and IHCDA held joint regional forums in early 2013 to collect information on regional housing and community development needs and receive suggestions on how state programs could better meet these needs. This input resulted in program modifications--e.g., the proposed Section 108 loan program, dedicated programs for CDBG infrastructure improvements, a new process for HOME fund allocation--for 2013.

The State will strive for continuous improvements to its programs, as needed, to best meet the needs of the rural communities and low income residents.

Describe coordination 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
N/A; for jurisdictions.

Describe consultation with the Continuum(s) of Care that serves the State 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

The State ESG program presented their program plans to the Funding & Strategy Committee (FSC) members in March 2013. The FSC represents homeless services providers who provide temporary or permanent housing and/or services to homeless persons, mental health service providers, Regional Planning Council Chairs within the Continuum of Care (CoC), the Department of Education, Supportive Housing Service providers, and the entitlement city. The Chair of the FSC is the Continuum of Care Collaborative Applicant for all McKinney Vento Funding opportunities. The FSC oversees local, state, and federal funding for the CoC and seeks new opportunities for funding to end homelessness, such as Section 811 PRAD, Mckinney Vento Competitive Applications and the Consolidated Plan Application. The FSC helps to develop funding policy to advance CoC priorities and oversees the integration and use of mainstream resources in the area. The FSC oversees funding allocation and helps to set policy for the State ESG. The objective is to ensure integration of CoC and ESG under the same performance standards, meeting all the needs and gaps in the CoC area.

The Planning Council has three other committees; Data Collection and Evaluation, Quality and Performance, and Housing and Program Continuum Development. The State ESG program is administered in part by each committee.

The Data Collection and Evaluation Committee will provide oversight and monitor the use of HMIS to collect performance measures such as length of shelter stays and recidivism, as well as tracking housing stability measures for the rapid rehousing program. This committee will also advise the HMIS lead agency during the implementation of the Arizona Matrix, as both a vulnerability index to inform case managers developing housing plans with participants and program level performance reports for the Funding and Strategies committee.

The Quality and Performance committee is being consulted to develop shelter quality standards using national best practices and a housing first approach to homeless assistance. The shared quality standards will focus on reduction in the length of homelessness, reduction in the return to homelessness and improved engagement and efficacy of all homeless assistance programs.

The Housing and Program Continuum Development committee will work with the State ESG program to develop and coordinate regional central intake and triage centers to ensure access to assistance is driven by the needs of persons experiencing homelessness. The Housing and Program Continuum Development committee will also coordinate the State ESG program with the CoC strategic planning around key community service systems: housing, employment, child care, youth services, primary health care, behavior health care, addiction treatment and other mainstream resources.

2. Agencies, groups, organizations and others who participated in the process and consultations

Please see the Grantee Unique Appendices for a summary of the stakeholder survey conducted for the 2013 Action Plan.

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

N/A; all agencies and stakeholders were encouraged and welcome to participate in the 2013 Annual Action Plan.

Narrative

In addition to the above, IHCDA assisted the Indiana Office of Medicaid Planning and Policy to apply to the U.S. Department of Health and Human Service for a Real Choice Systems Change planning grant. The RCSC partnership includes the Office of Medicaid Planning and Policy, Indiana Housing and Community Development Authority, Division of Mental Health and Addiction, Indiana State Department of Health, Corporation for Supportive Housing and Indiana NAMI. The partnership developed and is executing a work plan to link affordable housing for individuals with disabilities with Medicaid, behavioral health and primary health services to insure they can live independently in a community of their choice.

AP-12 Participation

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

Summarize citizen participation process and how it impacted goal-setting

Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
Public Meeting	Minorities Non-English Speaking - Specify other language: as requested Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Economic development and local officials	Please see the Grantee Unique Appendices, which contains a section that summarizes the participation in the meetings and primary findings.	Please see the Grantee Unique Appendices, which contains a section that summarizes the participation in the meetings and primary findings.	N/A	
Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Public hearing announcements of the draft plan were published in 16 different newspapers of general circulation in major population areas statewide.		N/A	
Other	Minorities Non-English Speaking - Specify other language: as requested Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Economic development officials	Please see the Grantee Unique Appendices, which contains a section that summarizes the participation in the survey and primary findings.	Please see the Grantee Unique Appendices, which contains a section that summarizes the participation in the survey and primary findings.	N/A	https://www.surveymonkey.com/s/IN_AnnualPlan_andAI

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources

Introduction

This section describes the primary resources the State of Indiana will use to fulfill the goals and objectives of the 2013 Annual Action Plan. The Expected Amount Available figures in the table below were provided by HUD at the time this report was prepared. It is unclear if, due to federal budget constraints, this annual allocation will be similar for the final program year of the Consolidated Plan cycle (2014).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	27,107,784	0	0	27,107,784	0	
HOPWA	Public – federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	1,050,000	0	0	1,050,000	0	
HOME	Public – federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	9,700,000	0	0	9,700,000	0	
ESG	Public – federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid rehousing (rental assistance) Rental Assistance Services Transitional housing	3,394,466	0	0	3,394,466	0	

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

OCRA match. Matching funds include local public or private sector in-kind services, cash or debt allocated to the CDBG project. The minimum level of local matching funds for CDBG projects is 10 percent of the total estimated project costs. This percentage is computed by adding the proposed CDBG grant amount and the local matching funds amount, and dividing the local matching funds amount by the total sum of the two amounts. The 2013 definition of match includes a maximum of 5 percent pre-approved and validated in-kind contributions. The balance of the 10 percent must be in the form of either cash or debt. Any in-kind over and above the specified 5 percent may be designated as local effort. Funds provided to applicants by the State of Indiana such as the Build Indiana Fund are not eligible for use as matching funds.

IHCDA match. Recent influxes of program funding from the federal government along with several new initiatives that expand IHCDA's vision and overall mission into more comprehensive developments, sometimes pose an issue with obtaining the required level of match/leveraging funds. IHCDA will thus create a match pool, which is a collection of resources taken from closed HOME-funded projects that documented match in excess of the required 25 percent. These eligible sources of match are kept on record and may be used as match for future IHCDA-funded projects. The pool allows applicants that, after exploring all possible avenues of meeting the requirement, are left with a shortfall to still proceed with an award application.

ESG match. ESG grantees are required to match 100 percent of the ESG award, and can include cash, grants and in-kind donations.

CDBG housing leverage. The State of Indiana requires 10 percent leverage for most CDBG funds. IHCDA recipients have used a variety of funding sources to meet this requirement, including Federal Home Loan Bank grants, Rural Development grants, contractor contributions, cash contributions and cash from local government general funds.

HOME match. The HOME program requires a 25 percent match, which is a federal requirement. Applicants must demonstrate eligible matching funds equal to 25 percent of the amount of HOME funds requested, less administration, environmental review and CHDO operating costs. If the applicant is proposing to utilize banked match for the activity:

*And it is the applicant's own banked match, the match liability on the previous award for which the match was generated must already be met and documented with IHCDA for the match to be eligible as of the application due date. Only HOME-eligible match generated on IHCDA awards made in 1999 or later, are eligible to be banked.

*Or, if it is another recipient's match, the applicant must provide an executed agreement with the application verifying that the recipient is willing to donate the match.

Only banked match from awards made in 1999 or later that have fully met their match liability are eligible to donate to another applicant. The award must be closed before the agreement to donate match is executed. Match cannot be sold or purchased and is provided purely at the discretion of the recipient that granted it.

Banked leverage generated on a CDBG award cannot be used as match on a future HOME award. Only banked match generated on a HOME award can be used on a future HOME award.

The HOME regulations outline the very specific types of HOME-eligible matching funds, and IHCDA must document expenditures of matching funds by individual sites. HOME recipients often use Federal Home Loan Bank grants, savings from below-market interest rate loans, and donations of property, as match for their HOME awards. Additionally, IHCDA documents the MRB financing used in the First Home program as a match.

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

N/A.

Discussion

Please see above.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Create New & Rehabilitate Affordable Rentals	2010	2014	Affordable Housing		Provide affordable housing opportunities	HOME: $4,700,000	Rental units constructed: 50 Household Housing Unit Rental units rehabilitated: 50 Household Housing Unit
Provide & Support Homebuyer Assistance	2010	2014	Affordable Housing		Provide affordable housing opportunities	HOME: $1,000,000	Direct Financial Assistance to Homebuyers: 700 Households Assisted
Develop Affordable Owner Occupied Units	2010	2014	Affordable Housing		Provide affordable housing opportunities	HOME: $1,000,000	Homeowner Housing Added: 25 Household Housing Unit
Complete Owner Occupied Rehabilitation	2010	2014	Affordable Housing		Provide affordable housing opportunities	CDBG: $2,752,934	Homeowner Housing Rehabilitated: 240 Household Housing Unit
Predevelopment Loan Funding for Affordable Housing	2010	2014	Affordable Housing		Provide affordable housing opportunities	HOME: $250,000	Other: 5 Other
Funding for Organizational Capacity	2010	2014	Affordable Housing		Provide affordable housing opportunities	HOME: $250,000	Other: 8 Other
Construction & Rehab of Perm Supportive Housing	2010	2014	Homeless Non-Homeless Special Needs		Reduce homelessness and improve stability	HOME: $1,500,000	Housing for Homeless added: 40 Household Housing Unit
Tenant-Based Rental Assistance	2010	2014	Homeless Non-Homeless Special Needs		Reduce homelessness and improve stability	HOME: $500,000	Tenant-based rental assistance / Rapid Rehousing: 200 Households Assisted
Operating Support Funding for Shelters	2010	2014	Homeless Non-Homeless Special Needs		Reduce homelessness and improve stability	ESG: $1,600,000	Other: 55 Other
Emergency Shelter Essential Services	2010	2014	Homeless		Reduce homelessness and improve stability	ESG: $282,386	Homeless Person Overnight Shelter: 15000 Persons Assisted
Rapid Rehousing	2010	2013	Homeless Non-Homeless Special Needs		Reduce homelessness and improve stability	ESG: $1,254,924	Tenant-based rental assistance / Rapid Rehousing: 130 Households Assisted

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
HOPWA Housing Information Services	2010	2014	Non-Homeless Special Needs		Reduce homelessness and improve stability	HOPWA: $100,000	Other: 75 Other
HOPWA Housing Placement Services	2010	2014	Non-Homeless Special Needs		Reduce homelessness and improve stability	ESG: $50,000	Other: 100 Other
HOPWA Improve Housing Options	2010	2014	Non-Homeless Special Needs		Reduce homelessness and improve stability	HOPWA: $800,000	Tenant-based rental assistance / Rapid Rehousing: 110 Households Assisted HIV/AIDS Housing Operations: 20 Household Housing Unit Other: 220 Other
Equipment for Emergency Services	2010	2014	Non-Housing Community Development		Creating livable and revitalized communities	CDBG: $2,800,000	Other: 10 Other
Construct Public Facility Projects	2010	2014	Non-Housing Community Development		Creating livable and revitalized communities	CDBG: $2,800,000	Other: 9 Other
Historic Preservation Projects	2010	2014	Non-Housing Community Development		Creating livable and revitalized communities	CDBG: $900,000	Other: 3 Other
Brownfield/Clearance Projects	2010	2014	Non-Housing Community Development		Creating livable and revitalized communities	CDBG: $900,000	Other: 13 Other
Construct & Rehab Infrastructure Improvements	2010	2014	Non-Housing Community Development		Local economic development	CDBG: $8,941,616	Other: 19 Other
Provide Planning Grants to Local Governments/CHDOs	2010	2014	Non-Housing Community Development		Local economic development	CDBG: $1,300,000	Other: 50 Other
Provide Project Support for Community Development	2010	2014	Non-Housing Community Development		Local economic development	CDBG: $5,300,000	Other: 10 Other
Create Jobs for Low to Moderate Income Populations	2010	2014	Non-Housing Community Development		Local economic development	CDBG: $2,000,000	Jobs created/retained: 150 Jobs
Construction & Rehab of Migrant Farmworker Housing	2012	2012	Homeless Non-Homeless Special Needs		Reduce homelessness and improve stability	CDBG: $500,000	Overnight/Emergency Shelter/Transitional Housing Beds added: 40 Beds

Table 2 – Goals Summary

AP-25 Allocation Priorities

Introduction

The table below contains an estimate of how CDBG, HOME, ESG and HOPWA funding will be allocated among eligible activities during the 2013 Action Plan.

Funding Allocation Priorities

Program	Create New & Rehabilitate Affordable Rentals	Provide & Support Homebuyer Assistance	Develop Affordable Owner Occupied Units	Complete Owner Occupied Rehabilitation	Predevelopment Loan Funding for Affordable Housing	Funding for Organizational Capacity	Construction & Rehab of Perm Supportive Housing	Tenant-Based Rental Assistance	Operating Support Funding for Shelters	Emergency Shelter Essential Services	Rapid Re-Housing	HOPWA Housing Inform. Services	HOPWA Housing Placement Services
CDBG	0	0	0	10	0	0	0	2	0	0	0	0	0
HOPWA	0	0	0	0	0	0	0	0	0	0	0	0	11
HOME	51	11	11	0	3	3	16	0	5	0	0	0	0
ESG	0	0	0	0	0	0	0	0	0	51	9	40	0

CONTINUED	HOPWA Improve Housing Options	Equipment for Emergency Services	Construct Public Facility Projects	Historic Preservation Projects	Brownfield/ Clearance Projects	Construct & Rehab Infrastructure Improvements	Provide Planning Grants to Local Governments/ CHDOs	Provide Project Support for Community Development	Create Jobs for Low to Moderate Income Populations	Construction & Rehab of Migrant Farmworker Housing	Colonias Set-Aside	Total
CDBG	0	0	10	10	3	3	33	5	20	4	0	**100**
HOPWA	5	84	0	0	0	0	0	0	0	0	0	**100**
HOME	0	0	0	0	0	0	0	0	0	0	0	**100**
ESG	0	0	0	0	0	0	0	0	0	0	0	**100**

Table 3 – Funding Allocation Priorities

Reason for Allocation Priorities

The allocation priorities were based on successful outcomes in past years; input from stakeholders through regional meetings and an online survey; and data on housing markets and economic conditions in nonentitlement areas.

How will the proposed distribution of funds address the priority needs and specific objectives described in the Consolidated Plan?

The 2013 Action Plan addresses the Five-year Strategies, Goals and Objectives similar to past program years. The addition of a Section 108 loan program for community enhancement and economic development activities will offer a much needed source of funding to encourage economic development and job creation in rural areas.

AP-30 Methods of Distribution

Introduction

This section summarizes the Method of Distributions (MOD) used to allocate funds from the four HUD block grants--CDBG, HOME, ESG and HOPWA--to nonentitlement communities in the State of Indiana. The detailed MODs are included in the attached Grantee Unique Appendices.

Distribution Methods

State Program Name	Funding Sources
State of Indiana	CDBG HOPWA HOME ESG

Table 4 - Distribution Methods by State Program

State programs addressed.

The four programs addressed by the MODs are: CDBG, HOME, ESG and HOPWA.

The CDBG MOD discusses the allocation of funds to subrecipients within the State programs of:

- Community Focus Fund,
- Stellar Communities Program,
- Planning Fund,
- Main Street Revitalization,
- Water/Wastewater Partnership Program,
- Brownfield Partnership Program,
- Public Facilities Program,
- Storm Water Systems Program,
- Technical Assistance, and
- Section 108 Program (new).

Criteria and their importance.

Each HUD block grant program has a MOD. The criteria used to select applications appear in the MODs in the Grantee Unique Appendices:

- CDBG MOD—Attachments C through J of the CDBG MOD section
- HOME Program Requirements—begins on page 70 of the Grantee Unique Appendices
- ESG Program Requirements— begins on page 74 of the Grantee Unique Appendices
- HOPWA MOD— begins on page 84 of the Grantee Unique Appendices

***CDBG only*—Access of application manuals**

N/A; the CDBG MOD contains detailed selection criteria.

***ESG only*—Process for awarding funds to state recipients**

IHCDA plans to allocate funding to approximately 8-10 agencies to administer the ESG Rapid Rehousing and Homeless Prevention Components of the ESG program.

There will be approximately 60 agencies that will apply for operations, essentials, and financial assistance and approximately one agency applying for an outreach component. A request for proposals will be distributed to all the Regional Planning Councils on the Homeless throughout the State, to the current subrecipients of the ESG program, current permanent supportive housing rental assistance programs (mental health centers, housing agencies, community action agencies, non profits) who have had experience with rental assistance and also have had experience with the previous Homeless Prevention and Rapid Rehousing Program (HPRP). Each proposal will be reviewed by at least one IHCDA Community Services staff person and by the Funding and Strategies committee of the Indiana Planning Council on the Homeless. Each reviewer will complete a scoring tool, assigning points based on the following program design components: outreach system, centralized intake point, systems coordination, organizational capacity, permanent housing placement strategy, history of administering the rental assistance programs, amount of match provided and coordination with ESG Entitlement City funds (as applicable). Each subrecipient will be awarded based upon the homeless need in their community and their ability to provide match. The amount of each award could be between $50,000 - $350,000 each.

HOPWA only: Method of selecting project sponsors

IHCDA will facilitate a competitive request for qualifications (RFQ), advertised through the CoC network and posted online, for HIV/AIDS service providers. The RFQ will be competitive in order to allocate funding based on six criteria:

- How long the agency has served the population as an Indiana State Department of Health care coordination site.
- What housing services the organization provides.
- Experience providing HOPWA assistance.
- How HOWPA will meet the unmet housing need in an area.
- Involvement with local Regional Planning Council/Committees/Leadership roles within RPC.

- How the agency has been involved with the Indiana Triage Project.

Resource Allocation among Funding Categories

Please see the distribution of funds among program categories appearing on page 3 of the CDBG MOD.

Threshold Factors and Grant Size Limits

Please see the distribution of funds among program categories appearing on page 3 of the CDBG MOD.

Outcome Measures expected as results of Distribution Method

Desired outcomes are addressed in the ESG MOD on page 10 (Performance Standards).

For HOPWA, IHCDA will use the following indicators to measure subrecipient's ability to achieve the desired outcomes:

- Rental Assistance households/units
- Short-term rent, mortgage and utility assistance households/units
- Facility based housing operations support units
- Housing information services households
- Permanent housing placement services households
- Supportive services - households

Discussion

For the past few years, IHCDA has allocated HOME and CDBG funding using the Strategic Investment Process (SIP). SIP allowed applications to be submitted year-round on a rolling basis without any funding rounds, deadlines, or scoring criteria. Effective for FY 2013 HOME and CDBG funding, the SIP process will be eliminated. Both HOME and CDBG will be funded through a competitive scoring process involving threshold and scoring criteria. There will be set rounds and application deadlines for each program. The new CDBG application policy is currently in draft form and available for public comment until May 3, 2013. The new HOME application policy is currently being written by the IHCDA Real Estate staff and will be released for public comment upon completion.

Projects

Please see the Method of Distribution sections (Grantee Unique Appendices) for a description of 2013 Action Plan proposed projects and allocation priorities.

AP-40 Section 108 Loan Guarantee

Will the state help nonentitlement units of general local government to apply for Section 108 loan funds?

Yes

Available Grant Amounts

Full program description can be found with the Grantee Unique Appendices.

The State of Indiana operates a Section 108 loan funds program; State of Indiana Community Enhancement and Economic Development Loan Program. The program is administered by OCRA and IHCDA.

Acceptance process of applications

Full program description can be found with the Grantee Unique Appendices.

AP-45 Community Revitalization Strategies

Will the state allow units of general local government to carry out community revitalization strategies?

Yes

State's Process and Criteria for approving local government revitalization strategies

Please see the CDBG MOD and the new Section 108 Loan Program for more information about the State's programs to conduct community enhancement and economic development activities.

The Stellar Communities Program, funded with CDBG, makes available funds for a three-year revitalization strategy that will leverage unified State investment and funding from the partnering agencies to complete projects comprehensively. In the revitalization strategy, communities will identify areas of interest and types of projects, produce a schedule to complete projects, produce cost estimates, identify local match amounts, sources, and additional funding resources, indicate the level of community impact, and describe the significance each project will have on the overall comprehensive revitalization of the community. From this revitalization strategy, communities will produce a three-year community investment plan which will identify capital and quality of life projects to be completed during that period.

Evaluation and selection of the final two communities to the Stellar Communities Program will be based on:

- Completion of a Summary of Comprehensive Community Revitalization Strategy
- Identification of at least one project to be completed in each of the 3 program years. The total

number of projects is solely limited to the community's ability to successfully complete each project;

- Documentation of all project cost estimates, local match amounts and sources, and additional funding resources.
- Completion of the site visit checklist from the resource team.
- Documentation and support for the level of need for each project and the significance of each project in the overall revitalization efforts within the community;
- Explanation of the capacity of the applicant to administer the funds; and
- Description of the long-term viability of the strategic community investment plan.

AP-50 Geographic Distribution

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

The State of Indiana does not prioritize the allocation of CDBG, HOME or ESG geographically. Instead, the State identifies the greatest need for the State (and nonentitlement areas) in general, and this information is used to guide the funding priorities for each program year. For local needs, the State relies on the information presented in the funding applications.

OCRA does include a component of scoring in their CDBG applications where the low and moderate income percentage is a weighted score; a higher percentage of low and moderate income will yield a higher score. IHCDA includes a preference for application that attempts to reach low and very low-income levels of area median income.

The HOPWA grant does rely on a geographic allocation, determined through the Continuum of Care regions. Because IHCDA allocates HOPWA to all ISDH-established care coordination regions except Region 7, it was determined that IHCDA will fund one HOPWA project sponsor per every care coordination region. This will remain true for all care coordination regions. If a distinct eligible population with specific needs exists in a region (for example, homeless men in Lake County), IHCDA will work with the regional sponsor to tailor services to meet the needs of the population. In instances where the sponsor cannot meet these needs, the sponsor will have the ability to sub-grant a portion of its HOPWA award to another service provider.

Rationale for the priorities for allocating investments geographically

Previously the responsibility for deciding how to allocate funds geographically has been at the agency level. The State has maintained this approach, with the understanding that the program administrators are the most knowledgeable about where the greatest needs for the funds are located. Furthermore, the State understands that since housing and community development needs are not equally distributed, a broad geographic allocation could result in funds being directed away from their best use.

Discussion

Please see above.

Affordable Housing

AP-55 Affordable Housing

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	15,300
Non-Homeless	300
Special-Needs	300
Total	15,900

Table 8 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	400
The Production of New Units	50
Rehab of Existing Units	50
Acquisition of Existing Units	0
Total	500

Table 9 - One Year Goals for Affordable Housing by Support Type

Discussion

AP-60 Public Housing

Introduction

This section describes IHCDA's efforts as a public housing authority to improve the needs of renters receiving public housing subsidies.

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

IHCDA will launch the Section 8 HCVP Family Self Sufficiency Program (FSS) during the spring of 2013. FSS is designed to enable families to achieve economic independence and self-sufficiency. By linking the Section 8 Housing Choice Voucher Program (HCVP) vouchers with the help of both private and public resources, families are able to receive job training, educational services and other much needed assistance over a five year period. The goal is to eliminate the family's need for public assistance and enhance their ability to achieve homeownership, if desired.

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

IHCDA, as the State PHA, will also apply for Section 811 Project Based Rental Assistance in 2013. The target population will be for individuals with disabilities in State Operated Facilities and other restricted living situations. The Section 811 Project Based Rental Assistance will utilize existing HOME and Low Income Housing Tax Credit properties to provide the target population a choice of community-based housing options.

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

IHCDA is a High Performing Section 8 Only PHA.

Discussion

Please see above.

AP-65 Homeless and Other Special Needs Activities

Introduction

This section discusses 2013 program year activities that will benefit persons who are homeless and special needs populations.

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 State relies on its partners to conduct outreach to persons who are homeless, assess their needs and communicate these needs to the State. To that end, the State will:

- Require the use of the HMIS for all residential shelter programs serving homeless individuals and families.
- Require participation in annual, statewide homeless Point-in-Time Count in late January and timely submission of this data to IHCDA.

- Require that all ESG grantees actively participate in their Regional Planning Council on the Homeless meetings regularly (minimum 75 percent attendance).

Addressing the emergency shelter and transitional housing needs of homeless persons

In addition to the allocation of ESG to meet the needs of persons who are homeless (see AP-20), emergency shelter and transitional housing needs are addressed through the ESG's participation in the Indiana Planning Council on the Homeless, the governing body for the Balance of State program. The Planning Council has three other committees: Data Collection and Evaluation, Quality and Performance, and Housing and Program Continuum Development. The State ESG program is part of the work of each committee.

The strategic objectives of the Planning Council are to:

- Decrease shelter stays by increasing rapid rehousing to stable housing.
- Reduce recidivism of households experiencing homelessness.
- Decrease the number of Veterans experiencing homelessness.
- Decrease the number of persons experiencing Chronic Homelessness.
- Create new permanent supportive housing beds for chronically homeless persons.
- Increase the percentage of participants remaining in CoC funded permanent housing projects for at least six months to 86 percent or more.
- Decrease the number of homeless households with children.
- Increase the number of rental assistance programs and services.
- Increase the percentage of participants in ESG-funded rental assistance programs that move into permanent housing to 82 percent or more.
- Increase the percentage of participants in all CoC funded transitional housing that move into permanent housing to 70 percent or more.
- Increase the percentage of participants in CoC funded projects that are employed at exit to 38 percent or higher.
- Increase persons experiencing homelessness access to mainstream resources.
- Collaborate with local education agencies to assist in the identification of homeless families and inform them of their eligibility for McKinney-Vento education services.
- Improve homeless outreach and triage to housing and services.
- Improve HMIS data quality and coverage, and use data to develop strategies and policies to end homelessness.
- Develop effective discharge plans and programs for individuals leaving State Operated Facilities at risk of homelessness.

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

Please see above.

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

Please see above.

Discussion

Please see above.

AP-70 HOPWA Goals

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	220
Tenant-based rental assistance	110
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	15
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	5
Total	350

AP-75 Barriers to affordable housing

Actions 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.

The State of Indiana is in the process of updating its statewide Analysis of Impediments to Fair Housing Choice (AI) to more directly address HUD's current expectations of AIs. Focus groups with residents and stakeholders, especially those in protected classes, were held in the winter and spring of 2013. Surveys to collect stakeholder input on barriers to choice in the communities they serve have also been distributed. These activities will be followed with a review of land use and zoning regulations in a sample of nonentitlement communities, an assessment of State policies that may create barriers to housing choice and a review of private sector barriers. The draft AI will contain a new Fair Housing Action Plan for OCRA and IHCDA. A draft report is expected in fall 2013.

AP-85 Other Actions

Introduction

This section describes a variety of other efforts the State will continue during the program year to help address housing and community development needs.

Actions planned to address obstacles to meeting underserved needs

The State faces a number of obstacles in meeting the needs outlined in the five-year Consolidated Plan:

- Housing and community needs are difficult to measure and quantify on a statewide level. The Consolidated Plan uses both qualitative and quantitative data to assess statewide needs. However, it is difficult to reach all areas of the State in one year, and the most recent data in some cases are a few years old. Although the State makes a concerted effort to receive as much input and retrieve the best data as possible, it is also difficult to quantify local needs. Therefore, the State must rely on the number and types of funding applications as a measure of housing and community needs;
- The ability of certain program dollars to reach citizens is limited by the requirement that applications for funding must come from units of local government or nonprofit entities. If these entities do not perceive a significant need in their communities, they may not apply for funding; and
- Finally, limitations on financial resources and internal capacities at all levels can make it difficult for the State to fulfill the housing and community development needs of its many and varied communities.

To mitigate these obstacles, during the 2013 program year, the State will continue to provide training for the application process associated with the HUD grants to ensure equal access to applying for funds, and continually review and update its proposed allocation with current housing and community development needs, gathered through the citizen participation plan and demographic, housing market and community development research.

Actions planned to foster and maintain affordable housing

The primary activities to foster and maintain affordable housing are the State's CDBG and HOME funded activities that include the production of new units, homeownership opportunities, home rehabilitation and capacity support for affordable housing developers. Through the CDBG Program, IHCDA seeks to improve the quality of existing housing stock in Indiana. This program is designed to give preference in allocating Community Development Block Grant Owner- Occupied Repair (CDBG OOR) funding among selected developments that meet IHCDA¿s goals:

1. Demonstrate they are meeting the needs of their specific community.

2. Attempt to reach low and very low-income levels of area median income.

3. Are ready to proceed with the activity upon receipt of the award.

4. Revitalize existing neighborhoods, preferably with a comprehensive approach as part of a published community revitalization plan.

5. Propose projects that promote aging in place strategies for seniors, families with seniors, and persons with disabilities.

6. Propose projects that promote healthy family strategies for families with children under the age of 18.

7. Propose projects that are energy-efficient and are of the highest quality attainable within a reasonable cost structure.

Applicants of IHCDA's programs and funds are encouraged to engage in an array of activities necessary to attain the solutions desired by a community, such as:

- Pre-development and seed financing – limited to eligible nonprofits
- Operating capacity grants – limited to eligible nonprofits
- Permanent Supportive Housing – Applicants must participate in the Indiana Permanent Supportive Housing Institute to be considered for an IHCDA investment.
- Rental assistance
- Acquisition, rehabilitation, guarantees, refinance, or (re)construction of rental housing
- Homeownership counseling and down payment assistance
- Acquisition, rehabilitation, guarantees, refinance, or (re)construction of homebuyer housing
- Rehabilitation, modification, and energy improvements to owner-occupied housing.
- Additionally the State utilizes other programs (summarized earlier in this section) to help foster and maintain affordable housing and include:
- Affordable Housing and Community Development Fund;
- Indiana Foreclosure Prevention Network;
- Low Income Housing Tax Credits (LIHTC); and
- Section 8 voucher program.

Actions planned to reduce lead-based paint hazards

The Indiana Lead and Healthy Homes Program (ILHHP), of ISDH, has as its goal the elimination of lead poisoning as a public health problem, especially among young children whose health and development are most susceptible to the harmful effects of lead. The primary source of lead poisoning is lead-based paint. Addressing the problem through existing and new housing rehabilitation programs is fundamental to reach the Indiana and federal goal of eliminating childhood lead poisoning. Effective January 1, 2010, ISDH has taken responsibility to implement and enforce the state and federal regulations concerning lead-based paint. The regulations are designed to eliminate environmental hazards by ensuring that trained lead professionals are available to conduct the safe and effective elimination of the primary sources of lead poisoning.

The Residential Lead-Based Hazard Reduction Act of 1992 (commonly referred to as "Title X") supports widespread prevention efforts of lead poisoning from lead-based paint. As a part of the Act, in 1991, the

Office of Healthy Homes and Lead Hazard Control (OHHLHC) was established by HUD in order to bring together health and housing professionals in a concerted effort to eliminate lead-based paint hazards in America's privately-owned and low-income housing.

HUD has regulations to protect children from the hazards of lead-based paint in federally funded projects. HUD continues to provide training for compliance with these regulations. In October 2009, ISDH was awarded $1,070,000 from HUD to address lead hazards in Indiana homes.

The Indiana Lead-Safe Housing Advisory Council commissioned a study in late 2010. Based on the study the Council will develop housing based primary prevention recommendations. The study will do the following:

- Determine the feasibility and fiscal impact of universal blood lead testing in Indiana.
- Determine statewide prevalence and distribution of elevated blood lead levels as defined by 410 IAC 29.
- Determine the percentage of medical providers administering the questionnaire and the effectiveness of the questionnaire.
- Determine the economic impact of addressing lead hazards on the housing community.
- Determine the type of housing stock where lead hazards are present.
- Determine the sources of poisoning in Indiana based on environmental investigations.
- Review and make recommendations on the timing of the seller's disclosure form of known lead hazards to provide the consumer the best opportunity to make an informed decision.

Actions planned to reduce the number of poverty-level families

The State of Indiana does not have a formally adopted statewide anti-poverty strategy. In a holistic sense, the entirety of Indiana's Consolidated Plan Strategy and Action Plan is anti-poverty related because a stable living environment is also a service delivery platform. However, many of the strategies developed for the five-year Plan directly assist individuals who are living in poverty.

Indiana has a history of aggressively pursuing job creation through economic development efforts at the State and local levels. This emphasis on creating employment opportunities is central to a strategy to reduce poverty by providing households below the poverty level with a means of gaining sustainable employment.

Other efforts are also needed to combat poverty. Many of the strategies outlined in the Consolidated Plan are directed at providing services and shelter to those in need. Once a person has some stability in a housing situation, it becomes easier to address related issues of poverty and provide resources such as childcare, transportation and job training to enable individuals to enter the workforce. Indiana's community action agencies are frontline anti-poverty service providers. They work in close cooperation with State agencies to administer a variety of State and federal programs.

Education and skill development are an important aspect of reducing poverty. Investment in workforce development programs and facilities is an essential step to break the cycle of poverty. Finally, there continue to be social and cultural barriers that keep people in poverty. Efforts to eliminate discrimination in all settings are important. In some cases, subsidized housing programs are vital to ensure that citizens have a safe and secure place to live.

The State also utilizes the Section 3 requirement (a provision of the Housing and Urban Development Act of 1968). Section 3 applies to employment opportunities generated (jobs created) as a result of projects receiving CDBG or HOME funding through ORCA or IHCDA, whether those opportunities are generated by the award recipient, a subrecipient, and/or a contractor. The requirements of Section 3 apply to all projects or activities associated with CDBG or HOME funding, regardless of whether the Section 3 project is fully or partially funded with CDBG/HOME. A detailed description of Section 3 requirements is included in OCRA/IHCDA's award manual. A notice of Section 3 requirements is included in bid solicitations and is covered during the award trainings.

Actions planned to develop institutional structure

The State has an efficient institutional structure through which programs are delivered. Several gaps exist in the housing and community development delivery system, however, especially for meeting the need for affordable housing. The primary gaps include:

- Lack of coordination and communication. Many social service providers, local business leaders and citizens continually express frustration about not knowing what programs are available and how to access those programs. Without full knowledge of available programs, it is difficult for communities to start addressing their housing needs. The State continues to address this gap through distribution of information about resources through regional agency networks and at public events.
- Lack of capacity for not-for-profits to accomplish community needs. In many communities, the nonprofits are the primary institutions responsible for the delivery of housing and community development programs. These organizations function with limited resources and seldom receive funding designated for administrative activities. The State continues to include planning and capacity-building grants as eligible activities for CDBG and HOME.

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

A number of private-sector organizations are involved in housing policy in Indiana. On an association level, the Indiana Realtors Association, Indiana Homebuilders Association, Indiana Mortgage Bankers Association and other organizations provide input into housing and lending policies. Private lending institutions are primarily involved in providing mortgage lending and other real estate financing to the housing industry. Several banks are also active participants in IHCDA's First Home program. The private sector is largely able to satisfy the demands for market-rate housing throughout the State.

Many not-for-profit organizations or quasi-governmental agencies are putting together affordable housing developments and gaining valuable experience in addressing housing needs on a local level. As of March 2010, the State now has 49 organizations certified as Community Housing Development Organizations (CHDOs).

The State has an active network of community development corporations, many of which have become increasingly focused on housing and community development issues. These organizations are engaged in a variety of projects to meet their communities' needs, from small-scale rehabilitation programs to main street revitalization. The projects undertaken by community development corporations are often riskier and more challenging than traditional development projects.

Public housing authorities exist in the major metropolitan areas and in small to medium-sized communities throughout the State.

The State also has several organizations that advocate for State policies and organize housing and community development activities at the State level. The Indiana Association for Community Economic Development (IACED) is a membership organization for the State’s housing and community development nonprofits and provides top level policy coordination, as well as training and technical assistance. The Back Home in Indiana Alliance is comprised of Indiana leaders in several affordable-housing and disability-related organizations and help people with disabilities become homeowners in several Indiana communities. Rural Opportunities, Incorporated (ROI) is an advocacy organization that focuses on the housing and social service issues of the State’s migrant farmworker population.

Many not-for-profit organizations have become more actively engaged in delivering social services. Community mental health centers, religious and fraternal organizations and others provide support in the form of counseling, food pantries, clothing, emergency assistance, and other activities. The State’s 16 Area Agencies on Aging have also become more involved in housing issues for seniors.

During the 2013 program year, the State will continue regular outreach to its private and public sector partners through regional staff, workshops and training and opportunities for feedback about program requirements and structure (through regional meetings, surveys, etc).

The State's new Section 108 loan program is also expected to encourage innovative private-public partnerships.

Discussion

Please see above.

Program Specific Requirements

AP-90 Program Specific Requirements

Introduction

The CDBG Program Income section is not applicable.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220.(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	**0**

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.	70.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220.(I)(2)

1. **A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

   N/A.

2. **A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

   Please see the attachment that specifies HOME resale and recapture guidelines in the Grantee Unique Appendices.

3. **A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

   Please see the attachment that specifies HOME resale and recapture guidelines in the Grantee Unique Appendices.

4. **Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

   When loaning funds to rehabilitate multifamily developments, IHCDA will consider refinancing existing debt if it is necessary to permit or continue affordability under Sec. 92.252 and meets the priorities set forth in the State's Consolidated Plan.

   To receive full consideration by IHCDA, the following conditions must be met:

   - Rehabilitation must be the primary activity. Therefore, rehabilitation costs must exceed the amount used to refinance existing debt.
   - Except for permanent supportive housing developments, properties located within another Participating Jurisdiction must demonstrate equal and comparable financing from the local unit of government.
   - The development must satisfy a minimum 15-year affordability period.
   - Disinvestment in the property has not occurred.
   - The long term needs of the development can be met.
   - It is feasible to serve the targeted population over the affordability period.
   - Refinancing loans made or insured by any other Federal program, including, but not limited to, FHA, CDBG, or Rural Development is prohibited.

Emergency Solutions Grant (ESG)

5. Include written standards for providing ESG assistance (may include as attachment)

Please see the Grantee Unique Appendices, ESG Program Requirements, for written standards for providing ESG assistance.

6. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The State of Indiana has had a coordinated Continuum of Care (CoC) system for many years. Please see the Grantee Unique Appendices, under ESG Program Requirements, for details about how the ESG program will further the goals of CoC and the State's efforts to end homelessness by establishing common performance goals.

7. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

IHCDA plans to allocate funding to approximately 8-10 agencies to administer the ESG Rapid Rehousing and Homeless Prevention Components of the ESG program.

There will be approximately 60 agencies that will apply for the operations, essentials, financial assistance and approximately 1 agency applying for an outreach component. A request for proposals will be distributed to all the Regional Planning Councils on the Homeless throughout the state, to the current subrecipients of the ESG program, current permanent supportive housing rental assistance programs (mental health centers, housing agencies, community action agencies, non profits) who have had experience with rental assistance and also have had experience with the previous Homeless Prevention and Rapid Rehousing Program (HPRP). Each proposal will be reviewed by at least one IHCDA Community Services staff person and by the Funding and Strategies committee of the Indiana Planning Council on the Homeless. Each reviewer will complete a scoring tool, assigning points based on the following program design components: outreach system, centralized intake point, systems coordination, organizational capacity, permanent housing placement strategy, history of administering the rental assistance programs, amount of match provided and coordination with ESG Entitlement City funds (as applicable). Each subrecipient will be awarded based upon the homeless need in their community and their ability to provide match. This amount could be between $50,000 - $350,000 each. .

8. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

Any ESG recipient that cannot meet the participation requirement under CFR § 576.405(a) must include a plan that meets the requirements under CFR § 576.405(b).

The State ESG recipient – IHCDA - has a previous homeless person that is member of the Steering Committee that provides guidance to our CoC Programs and their policies and procedures. He currently lives in a permanent supportive housing program. The State of Indiana recognizes the invaluable perspective of homeless and formerly homeless individuals in developing an effective client-centered program and system. The State program strongly encourages subrecipients of the ESG program to incorporate this participation, to the maximum extent practicable, in a policy-making function of both the organization and the respective regional Planning Council on the Homeless. The State ESG program application requires applicants to explain how homeless participation is achieved at both an organizational level and within their regional Planning Councils on the Homeless. This issue is also reviewed at each program monitoring visit.

9. Describe performance standards for evaluating ESG.

Baseline performance measurements will be reports generated by the HMIS system and mainly from the Annual Progress Reports and the ESG reports for the 2012 year. Two of the standards are specific to the subrecipient's program performance and the remaining two are specific to system outcomes.

For 2013, ESG rental assistance program subrecipients: At discharge from program, 82 percent persons assisted will still be permanently housing. 65 percent of persons will increase their income.

For 2013 ESG program subrecipients that are Emergency shelters that have activities: operations, essential services and financial assistance: 50 percent persons will discharge to permanent housing, 25 percent of person's will increase their income.

For 2013 ESG program subrecipients that are Transitional Housing programs that have activities: operations, essential services and financial assistance: 69 percent will discharge to permanent housing, 50 percent will increase their income.

For 2013 ESG program subrecipients that have outreach component: 50 percent of identified caseload will be permanently housed.

For 2013 ESG program subrecipients that have outreach component: 50 percent identified caseload will increase their income.

The final two standards establish system-wide standards for the ESG program. The first sets a standard on the length of time that an individual or family remains homeless in the ESG service area.

1. The average length of stay of participants in ESG funded and other CoC programs should reduce by at least 10 percent by 2014 fiscal year.

2. The second system standard involves the extent to which individuals and families who leave homelessness experience additional episodes of homelessness. HUD has not released a recidivism methodology so until we receive a method, the Steering Committee along with the Data and Evaluation Committee will establish a methodology in the 2013 year. Since we started utilizing a new open HMIS system in March 2012, it has been an easier system to generate reports, utilize case management more thoroughly and produce special reports. Once a methodology is established, the Balance of State CoC will establish a baseline to track recidivism within ESG and all other CoC programs .The Continuum will focus on goals that will reduce returns to homelessness.

Both of these standards were set based upon HUD's stated performance targets for a high performing CoC. The CoC will use the HMIS system to measure these outcomes.

Discussion

Please see above.

Priorities, Goals and Projects

2013 Allocation of CDBG, HOME, ESG, HOPWA

Priorities, Goals and Projects, 2013, State of Indiana

Priorities (also Five-year Goals)		HUD Objective Code	2013 Goals and Projects	Indicator	Project Outcomes: Five Year	Project Outcomes: Year Four	Funding for Year Four: CDBG	Funding for Year Four: HOME	Funding for Year Four: ESG	Funding for Year Four: HOPWA	2013 Year Funds
1. Expand and preserve affordable housing opportunities throughout the housing continuum.	• Rental housing.	DH-2.1	➢ Rehabilitation and new construction	Units	675	100		$4,700,000			**$ 4,700,000**
	• Homeownership opportunities.	DH-2.2	➢ Homeownership education and counseling and downpayment assistance	Households	2,500	700		$1,000,000			**$ 1,000,000**
			➢ Homebuyer development	Units	125	25		$1,000,000			**$ 1,000,000**
			➢ Owner-occupied rehabilitation	Units	1,500	240	$2,752,934				**$ 2,752,934**
	• Build capacity for affordable housing developers.	DH-2.3	➢ Predevelopment loans	Units	25	5		$250,000			**$ 250,000**
			➢ Organizational capacity	Units	80	8		$250,000			**$ 250,000**
2. Reduce homelessness and increase housing stability for special needs populations.	• Improve the range of housing options for homeless and special needs populations.	DH-1.1	➢ Permanent supportive housing	Units	250	40		$1,500,000			**$ 1,500,000**
			➢ Rental assistance	Units	1,000	200		$500,000			**$ 500,000**
			➢ Migrant farmworker housing	Units	N/A	40	$500,000				
	• Support activities to improve the range of housing options for special needs populations and to end chronic homelessness.	DH-1.2	➢ Operating support	Shelters	55	55			$1,600,000		**$ 1,600,000**
			➢ Essential services	Persons	80,000	15,000			$282,386		**$ 282,386**
			➢ Rapid re-housing	Persons	N/A	130			$1,254,924		**$ 1,254,924**
	• Improve the range of housing options for special needs populations living with HIV/AIDS.	DH-1.3	➢ Housing information services	Households	375	75				$100,000	**$ 100,000**
			➢ Permanent housing placement services	Households	500	100				$50,000	**$ 50,000**
			➢ Supportive services	Households	1,000	0				$0	**$ -**
		DH-2.4	➢ Tenant based rental assistance	Units	1,000	110				$500,000	**$ 500,000**
			➢ Short-term rent, mortgage and utility assistance	Units	1,500	220				$200,000	**$ 200,000**
			➢ Facility based housing operations support	Units	35	15				$50,000	**$ 50,000**
			➢ Short term supportive housing	Units	100	5				$50,000	**$ 50,000**
3. Promote livable communities and community revitalization through addressing unmet community development needs.	• Improve the quality and/ or quantity of neighborhood services for low and moderate income persons.	SL-1.1	➢ Community Focus Fund								
			—Emergency services (stations & fire struck)	Projects	35-45	8	$2,000,000				**$ 2,000,000**
			— Public facilities	Facilities	30	7	$2,000,000				**$ 2,000,000**
			—Historic preservation projects	Projects	10	2	$500,000				**$ 500,000**
			—Brownfield/clearance projects	Projects	10-25	8	$150,000				**$ 150,000**
	• Improve the quality and/or quantity of public improvements for low and moderate income persons.	SL-1.1	➢ Public Facilities Program								
			—Emergency services (stations & fire trucks)	Projects		2	$800,000				**$ 800,000**
			— Public facilities	Facilities		2	$800,000				**$ 800,000**
			— Historic preservation projects	Projects		1	$400,000				**$ 400,000**
											$ - **$ -**
		SL-3.1	➢ Community Focus Fund								
			—Infrastructure systems	Systems	120	6	$3,441,616				**$ 3,441,616**
		SL-3.1	➢ Water/Wastwater Partnership Program								
			— Infrastructure systems	Systems		9	$3,500,000				
		SL-3.1	➢ Stormwater Improvements Program								
			— Infrastructure systems	Systems		4	$2,000,000				
		SL-3.2	➢ Planning Fund	Grants	145	50	$1,300,000				**$ 1,300,000**
		SL-3.3	➢ Stellar Communities	Projects		6	$4,000,000				**$ 4,000,000**
			➢ Main Street Revitalization Program	Projects		4	$1,300,000				**$ 1,300,000**
4. Promote activities that enhance local economic development efforts.	• Coordinate with private industry, businesses and developers to create jobs for low to moderate income populations in rural Indiana.	EO-3.1	➢ Section 108 Loan Program	Jobs	1,300	150	$2,000,000				**$ -**
		EO-3.1	➢ Comprehensive Brownfield Redevelopment Program	Projects		5	$750,000				
Administrative and supportive services			➢ CDBG admin. (OCRA and IHCDA)				$642,156				**$ 642,156**
			➢ HOME admin. (IHCDA)					$500,000			**$ 500,000**
			➢ HOPWA admin. (IHCDA)							$100,000	**$ 100,000**
			➢ ESG program admin. (IHCDA)						$257,156		**$ 257,156**
			➢ Tech. assist. set-aside (OCRA)				$271,078				**$ 271,078**
						TOTAL	**$27,107,784**	**$9,700,000**	**$3,394,466**	**$1,050,000**	**$ 41,252,250**

Methods of Distribution

CDBG, HOME, ESG and HOPWA 2013

CDBG Method of Distribution

STATE OF INDIANA

STATE COMMUNITY DEVELOPMENT BLOCK GRANT
(CDBG) PROGRAM (CFDA: 14-228)

INDIANA OFFICE OF COMMUNITY AND RURAL AFFAIRS

FY 2013 PROGRAM DESIGN AND METHOD OF DISTRIBUTION

GENERAL BACKGROUND INFORMATION AND NATIONAL CDBG OBJECTIVES

The State of Indiana, through the Indiana Office of Community and Rural Affairs, assumed administrative responsibility for Indiana's Small Cities Community Development Block Grant (CDBG) Program in 1982, under the auspices of the U.S. Department of Housing and Urban Development (HUD). In accordance with 570.485(a) and 24 CFR Part 91, the State must submit a Consolidated Plan to HUD by May 15th of each year following an appropriate citizen participation process pursuant to 24 CFR Part 91.325, which prescribes the State's Consolidated Plan process as well as the proposed method of distribution of CDBG funds for 2013. **The State of Indiana's anticipated allocation of federal Community Development Block Grant (CDBG) funds for FY 2013 is $27,107,784.**

This document applies to all federal Small Cities CDBG funds allocated by HUD to the State of Indiana, through its Office of Community and Rural Affairs.

The primary objective of Indiana's Small Cities CDBG Program is to assist in the development and re-development of viable Indiana communities by using CDBG funds to provide a suitable living environment and expand economic opportunities, principally for low and moderate income persons.

Indiana's program will place emphasis on making Indiana communities a better place in which to reside, work, and recreate. Primary attention will be given to activities, which promote long term community development and create an environment conducive to new or expanded employment opportunities for low and moderate income persons.

The Office of Community and Rural Affairs will pursue this goal of **investing CDBG wisely** and all applicable strategic priorities by distributing CDBG funds in a manner, which promotes exploration of all alternative resources (financial and personal) when making funding decisions respective to applications for CDBG funding.

PROGRAM AMENDMENTS

The Indiana Office of Community and Rural Affairs reserves the right to transfer up to ten percent (10%) of each fiscal year's available allocation of CDBG funds (i.e. FY 2013 as well as prior-years' reversions balances) between the programs described herein in order to optimize the use and timeliness of distribution and expenditure of CDBG funds, without formal amendment of this Consolidated Plan.

The Office of Community and Rural Affairs will provide citizens and general units of local government with reasonable notice of, and opportunity to comment on, any substantial change proposed to be made in the use of FY 2013 CDBG as well as reversions and residual available balances of prior-years' CDBG funds. "Substantial Change" shall mean the movement between programs of more than ten percent (10%) of the total allocation for a given fiscal year's CDBG funding allocation, or a major modification to programs described herein. The Office of Community and Rural Affairs, in consultation with the Indianapolis office of the US Department of Housing and Urban Development (HUD), will determine those actions, which may constitute a "substantial change".

The State (OCRA) will formally amend its FY 2013 Consolidated Plan if the Office of Community and Rural Affairs' **Method of Distribution for FY 2013 and prior-years funds** prescribed herein are to be significantly changed. The OCRA will determine the necessary changes, prepare the proposed amendment, provide the public and units of general local government with reasonable notice and opportunity to comment on the proposed amendment, consider the comments received, and make the amended FY 2013 Consolidated Plan available to the public at the time it is submitted to HUD. In addition, the Office of Community and Rural Affairs will submit to HUD the amended Consolidated Plan before the Department implements any changes embodied in such program amendment.

ELIGIBLE ACTIVITIES/FUNDABILITY

All activities, which are eligible for federal CDBG funding under Section 105 of the Federal Housing and Community Development Act of 1974, as, amended (Federal Act), are eligible for funding under the Indiana Office of Community and Rural Affairs' FY 2013 CDBG program. However, the Indiana Office of Community and Rural Affairs reserves the right to prioritize its method of funding; the Office of Community and Rural Affairs prefers to expend federal CDBG funds on activities/projects which will produce tangible results for principally low and moderate income persons in Indiana. Funding decisions will be made using criteria and rating systems, which are used for the State's programs and are subject to the availability of funds. It shall be the policy under the state program to give priority to using CDBG funds to pay for actual project costs and not to local administrative costs. **The State of Indiana certifies that not less than seventy-percent (70%) of FY 2013 CDBG funds will be expended for activities principally benefiting low and moderate income persons, as prescribed by 24 CFR 570.484, et. seq.**

ELIGIBLE APPLICANTS

1. All Indiana counties, cities and incorporated towns which do not receive CDBG entitlement funding directly from HUD or are not located in an "urban county" or other area eligible for "entitlement" funding from HUD.

2. All Indian tribes meeting the criteria set forth in Section 102 (a)(17) of the Federal Act.

In order to be eligible for CDBG funding, applicants may not be suspended from participation in the HUD-funded CDBG Programs or the Indiana Office of Community and Rural Affairs due to findings/irregularities with previous CDBG grants or other reasons. In addition, applicants may be suspended from participation in the state CDBG-funded projects administered by the Indiana Housing & Community Development Authority (IHCDA), such funds being subcontracted to the IHCDA by the Office of Community and Rural Affairs.

Further, in order to be eligible for CDBG funding, applicants may not have overdue reports, overdue responses to monitoring issues, or overdue grant closeout documents for projects funded by either the Office of Community and Rural Affairs or IHCDA projects funded using state

CDBG funds allocated to the IHCDA by the Office of Community and Rural Affairs. All applicants for CDBG funding must fully expend all CDBG Program Income as defined in 24 CFR 570.489(e) prior to, or as a part of the proposed CDBG-assisted project, in order to be eligible for further CDBG funding from the State.

Other specific eligibility criteria are outlined in **General Selection Criteria** provided herein.

FY 2013 FUND DISTRIBUTION

Sources of Funds:

FY 2013 CDBG Allocation	$27,107,784
Section 108 Loan Program	$135,000,000 (up to)
CDBG Program Income	$0
Total:	$162,107,784

Uses of Funds:

1.	Community Focus Fund	$8,091,616
2.	Housing Programs (IHCDA)	$3,252,934
3.	Stellar Communities Program	$4,000,000
4.	Planning Fund	$1,300,000
5.	Main Street Revitalization Program	$1,300,000
6.	Water/Wastewater Partnership Program	$3,500,000
7.	IFA Brownfield Partnership Program	$ 750,000
8.	Public Facilities Program	$2,000,000
9.	Storm Water Systems Program	$2,000,000
10.	Urgent Need Fund	$0
11.	Technical Assistance	$271,078
12.	Administration	$642,156
13.	Section 108 Loan Program (CEED)	$135,000,000 (up to)
	Total:	**$162,107,784**

(a) The State of Indiana (Office of Community and Rural Affairs) does not project receipt of any CDBG program income for the period covered by this FY 2013 Consolidated Plan. In the event the Office of Community and Rural Affairs receives such CDBG Program Income, such moneys will be placed in the Community Focus Fund for the purpose of making additional competitive grants under that program. Reversions of other years' funding will be placed in the Community Focus Fund for the specific year of funding reverted. The State will allocate and expend all CDBG Program Income funds received prior to drawing additional CDBG funds from the US Treasury. However, the following exceptions shall apply:

1. This prior-use policy shall not apply to housing-related grants made to applicants by the Indiana Housing & Community Development Authority (IHCDA), a separate agency, using CDBG funds allocated to the IHCDA by the Office of Community and Rural Affairs.

2. Program income generated by CDBG grants awarded by the Office of Community and Rural Affairs (State) using FY 2013 CDBG funds must be returned to the Office of Community and Rural Affairs, however, such amounts of less than $25,000 per calendar year shall be excluded from the definition of CDBG Program Income pursuant to 24 CFR 570.489.

All obligations of CDBG program income to projects/activities require prior approval by the Office of Community and Rural Affairs. This includes use of program income as matching funds for CDBG-funded grants from the IHCDA. Applicable parties should contact the Office of the Indiana Office of Community and Rural Affairs at (317) 232-8333 for application instructions and documents for use of program income prior to obligation of such funds.

Local Governments that have been inactive in using their program income are required to return their program income to the State. The State will use program income reports submitted by local governments and/or other information obtained from local governments to determine if they have been active or inactive in using their program income. Local governments that have an obligated/approved application to use their program income to fund at least one project in the previous 24 months will be considered active. Local governments that have not obtained approval for a project to utilize their program income for 24 months will be considered inactive.

Furthermore, U.S. Department of Treasury regulations require that CDBG program income cash balances on hand be expended on any active CDBG grant being administered by a grantee before additional federal CDBG funds are requested from the Office of Community and Rural Affairs. These US Treasury regulations apply to projects funded both by IHCDA and the Office of Community and Rural Affairs. Eligible applicants with CDBG program income should strive to close out all active grant projects presently being administered before seeking additional CDBG assistance from the Office of Community and Rural Affairs or IHCDA.

Eligible applicants with CDBG program income should contact the Office of Community and Rural Affairs at (317) 232-8333 for clarification before submitting an application for CDBG financial assistance.

METHOD OF DISTRIBUTION

The choice of activities on which the State (Office of Community and Rural Affairs) CDBG funds are expended represents a determination by Office of Community and Rural Affairs and eligible units of general local government, developed in accordance with the Department's CDBG program design and procedures prescribed herein. The eligible activities enumerated in the following Method of Distribution are eligible CDBG activities as provided for under Section 105(a) of the Federal Act, as amended.

All projects/activities funded by the State (Office of Community and Rural Affairs) will be made on a basis which addresses one (1) of the three (3) national objectives of the Small Cities CDBG Program as prescribed under Section 104(b)(3) of the Federal Act and 24 CFR 570.483 of implementing regulations promulgated by HUD. CDBG funds will be distributed according to the following Method of Distribution (program descriptions):

A. Community Focus Fund (CFF): $8,091,616

The Office of Community and Rural Affairs will award community Focus Fund (CFF) grants to eligible applicants to assist Indiana communities in the areas of public facilities, and various other eligible community development needs/projects. Applications for funding, which are applicable to local economic development and/or job-related training projects, should be pursued under the Office of Community and Rural Affairs' Community Economic Development Fund (CEDF). Projects eligible for consideration under the CEDF program under this Method of Distribution shall generally not be eligible for consideration under the CFF Program. Eligible activities include applicable activities listed under Section 105(a) of the Federal Act. Eligible Community Focus Fund (CFF) projects have been allocated funding in alignment with the Goals and Priorities listed in Section IV and include:

1.	Infrastructure improvements (water, sewer, storm water)	$3,441,616
2.	Emergency Services projects (fire trucks, fire stations, ems stations)	$2,000,000
3.	Other public facilities (i.e., senior centers, health centers, libraries)	$2,000,000
4.	Historic preservation projects	$500,000
5.	Brownfield/Clearance projects	$150,000

Applications will be accepted and awards will be made on a competitive basis one (1) time per year.

The specific threshold criteria and basis for project point awards for CFF grant awards are provided in Attachment D hereto. The Community Focus Fund (CFF) Program shall have a maximum grant amount of $500,000 for water, sewer and storm drainage projects, $150,000 for fire trucks and $400,000 for all other projects. The applicant may apply for only one project in a grant cycle.

Projects will be funded in one (1) funding cycle with approximately a six (6) month pre-application and final-application process. Projects will compete for CFF funding and be judged and ranked according to a standard rating system (Attachment D). The highest ranking projects from each category will be funded to the extent of funding available for each specific CFF funding cycle/round. The Office of Community and Rural Affairs will provide eligible applicants with adequate notice of deadlines for submission of CFF proposal (pre-application) and full applications.

For the CFF Program specifically, the amount of CDBG funds granted will be based on a $5,000 cost per project beneficiary.

B. Housing Program: $3,252,934

The State (Office of Community and Rural Affairs) has contracted with the Indiana Housing & Community Development Authority (IHCDA) to administer funds allocated to the State's Housing Program. The Indiana Housing & Community Development Authority will act as the administrative agent on behalf of the Indiana Office of Community and Rural Affairs. Please refer to the Indiana Housing & Community Development Authority’s portion of this FY 2013 Consolidated Plan for the method of distribution of such subcontracted CDBG funds from the Office of Community and Rural Affairs to the IHCDA.

C. Stellar Communities Program: $ 4,000,000

The State of Indiana will to set aside $4,000,000 of its FY 2013 CDBG funds for the Stellar Communities Program. Indiana’s Stellar Communities Program is a collaborative effort of the Office of Community and Rural Affairs (OCRA), the Indiana Housing and Community Development Authority (IHCDA), and the Indiana Department of Transportation (INDOT). The Stellar Communities Program is seeking to engage two communities to achieve a three-year revitalization strategy that will leverage unified state investment and funding from the partnering agencies to complete projects comprehensively. In the revitalization strategy communities will identify areas of interest and types of projects, produce a schedule to complete projects, produce cost estimates, identify local match amounts, sources, and additional funding resources, indicate the level of community impact, and describe the significance each project will have on the overall comprehensive revitalization of the community. From this revitalization strategy, communities will produce a three-year community investment plan which will identify capital and quality of life projects to be completed during that period.

Evaluation and selection of the final two communities to the Stellar Communities Program will be based on:

- Summary of Comprehensive Community Revitalization Strategy

- Identify at least one project to be completed in each of the 3 program years. The total number of projects is solely limited to the community’s ability to successfully complete the projects;

- Identify/document project cost estimates, local match amounts and sources, and additional funding resources.

- Completion of the site visit checklist from the resource team.

- Document and support the level of need for each project and the significance of each project in the overall revitalization efforts within the community;

- Capacity of the applicant to administer the funds;

- The long-term viability of the strategic community investment plan;

All projects funded by OCRA will be eligible for funding under a national objective of the Federal Act and requirements of 24 CFR 570.208 and 24 CFR 570.483 of applicable HUD regulations.

All projects funded by IHCDA with CDBG funds will be eligible for funding under a national objective of the Federal Act and requirements of 24 CFR 570.208 and 24 CFR 570.483 of applicable HUD regulations. All projects funded by IHCDA with HOME, ESG and/or HOPWA funds will meet the specific requirements set forth by those programs.

D. Planning Fund: $ 1,300,000

The State (Office of Community and Rural Affairs) will set aside $1,300,000 of its FY 2013 CDBG funds for planning-only activities, which are of a project-specific nature. The Office of Community and Rural Affairs will make planning-only grants to units of local government to carry out planning activities eligible under 24 CFR 570.205 of applicable HUD regulations. The Office of Community and Rural Affairs will award such grants on a competitive basis and grant the Office of Community and Rural Affairs will review applications monthly. The Office of Community and Rural Affairs will give priority to project-specific applications having planning activities designed to assist the applicable unit of local government in meeting its community development needs by reviewing all possible sources of funding, not simply the Office of Community and Rural Affair's Community Focus Fund or Community Economic Development Fund.

CDBG-funded planning costs will exclude final engineering and design costs related to specific activities which are eligible activities/costs under 24 CFR 570.201-204.

The specific threshold criteria and basis for project point awards for PL grant awards are provided in Attachment D hereto. The CFF Planning (PL) Program shall have a maximum grant amounts as follows:

- Environmental infrastructure studies are limited as follows:
  - $30,000 for a study on a single utility,
  - $40,000 for a study on two utilities, and
  - $50,000 for a master utility study (water, wastewater, and storm water).
- Dam or Levee System Evaluations will be limited to $50,000.
- Comprehensive plans are limited to $40,000.
- Downtown revitalization plans are limited as follows:
  - Populations over 2,000 are limited to $40,000, and
  - Populations under 2,000 are limited to $30,000
- Economic development plans are limited to $40,000.
- Public facilities plans will be limited to $15,000.
- Historic preservation plans will be limited to $15,000.

For the PL Program specifically, the amount of CDBG funds granted will be based on a $5,000 cost per project beneficiary.

E. Main Street Revitalization Program (Round 1): $500,000

The Office of Community and Rural Affairs will award Main Street Revitalization Program (MSRP) grants to eligible applicants to assist Indiana communities with activities intended to revitalize their downtown area. Each applicant must have a designated Indiana Main Street Group and the project must be part of the Main Street Group's overall strategy.

Applications will be accepted and awards will be made on a competitive basis. The specific threshold criteria and basis for project point awards for MSRP grant awards are provided in Attachment E hereto. The Main Street Revitalization Program (MSRP) shall have a maximum grant amount of $250,000.

For the MSRP Program specifically, the amount of CDBG funds granted will be based on a $5,000 cost per project beneficiary.

F. Main Street Revitalization Program (Round 2): $800,000

The Office of Community and Rural Affairs will award Main Street Revitalization Program (MSRP) grants to eligible applicants to assist Indiana communities with activities intended to revitalize their downtown area. Each applicant must meet the following prerequisites:

1) Have a designated Indiana Main Street Organization;
2) The Main Street Organization is in good standing for meeting all the reporting requirements;
3) The Main Street Organization has attended all required workshops associated with the Indiana Main Street Program during past year;
4) The Main Street organization is functioning within the Main Street 4 Point Approach of Organization, Design, Economic Restructuring, and Promotion;
5) The Main Street organization has current Work Plans for each of its Committees that have been submitted to Indiana Main Street;
6) The Main Street Organization has a business recruitment/retention plan that is approved by the Indiana Main Street Program;
7) The project must be part of the Main Street Organization's overall strategy;
8) The Community has completed a downtown revitalization plan within the past five years that meets OCRA's Minimum Technical Requirements.

Applications will be accepted and awards will be made on a competitive basis. The specific threshold criteria and basis for project point awards for MSRP grant awards are provided in Attachment F hereto. The Main Street Revitalization Program (MSRP) shall have a maximum grant amount of $400,000.

For the MSRP Program specifically, the amount of CDBG funds granted will be based on a $5,000 cost per project beneficiary.

G. Water/Wastewater Improvements Program: $ 3,500,000

Based on public comments received, the State intends to amend this program prior to implementation.

The State of Indiana will to set aside $3,500,000 of its FY 2013 CDBG funds for the Water/Wastewater Improvements Program. Indiana's Water/Wastewater Improvements Program (WWP) is a collaborative effort of the Office of Community and Rural Affairs (OCRA), the Indiana Finance Authority (IFA), and USDA Rural Development (USDA-RD). The WWP strategy will leverage unified state investment and funding from the partnering agencies to complete comprehensive system improvements.

Eligible applicants will have approved projects with the Indiana State Revolving Fund and/or the USDA-RD Water and Environmental Programs.

Applications will be accepted and awards made on a competitive basis one time per year. The Water/Wastewater Improvements Program (WWP) shall have a maximum grant amount according to the schedules below:

Wastewater Maximum Grant Amounts	**User Rates (Over $50)**	**User Rates ($30 to $50)**	**User Rates (Under $30)**
Tier III – LMI% 61.1 and higher	$750,000	$600,000	$400,000
Tier II – LMI% 55.1 to 61.0	$500,000	$400,000	$300,000
Tier I – LMI% 51.0 to 55.0	$350,000	$300,000	$250,000

Drinking Water Maximum Grant Amounts	User Rates (Over $45)	User Rates ($25 to $45)	User Rates (Under $25)
Tier III – LMI% 61.1 and higher	$750,000	$600,000	$400,000
Tier II – LMI% 55.1 to 61.0	$500,000	$400,000	$300,000
Tier I – LMI% 51.0 to 55.0	$350,000	$300,000	$250,000

Applications will be accepted and awards will be made on a competitive basis. The specific threshold criteria and basis for project point awards for WWP grant awards are provided in Attachment G hereto.

For the WWP Program specifically, the amount of CDBG funds granted will be based on a $5,000 cost per project beneficiary.

All projects funded by OCRA will be eligible for funding under a national objective of the Federal Act and requirements of 24 CFR 570.208 and 24 CFR 570.483 of applicable HUD regulations.

H. Comprehensive Brownfield Redevelopment Program: $ 750,000

The State of Indiana will to set aside $750,000 of its FY 2013 CDBG funds for the Comprehensive Brownfield Redevelopment Program (CBRP). Indiana's CBRP program is a collaborative effort of the Office of Community and Rural Affairs (OCRA) and the Indiana Finance Authority (IFA). The CBRP funding strategy will leverage funding from the partnering agencies to address comprehensive Brownfield remediation and clearance projects.

Applications will be accepted and awards will be made on an ongoing basis. The specific threshold criteria and basis for project point awards for CBRP grant awards are provided in Attachment H hereto. The Comprehensive Brownfield Redevelopment Program (CBRP) shall have a maximum grant amount of $500,000.

All projects funded by OCRA will be eligible for funding under a national objective of the Federal Act and requirements of 24 CFR 570.208 and 24 CFR 570.483 of applicable HUD regulations.

I. Public Facilities Program: $2,000,000

The State of Indiana will to set aside $2,000,000 of its FY 2013 CDBG funds for the Public Facilities Program (PFP).

Applications will be accepted and awards will be made on a competitive basis. The specific threshold criteria and basis for project point awards for PFP grant awards are provided in Attachment I hereto.

For the PFP specifically, the amount of CDBG funds granted will be based on a $5,000 cost per project beneficiary.

All projects funded by OCRA will be eligible for funding under a national objective of the Federal Act and requirements of 24 CFR 570.208 and 24 CFR 570.483 of applicable HUD regulations.

J. Stormwater Improvements Program: $2,000,000

The State of Indiana will to set aside $2,000,000 of its FY 2013 CDBG funds for the Stormwater Improvements Program (SIP).

Applications will be accepted and awards will be made on a competitive basis. The specific threshold criteria and basis for project point awards for SIP grant awards are provided in Attachment J hereto.

For the SIP Program specifically, the amount of CDBG funds granted will be based on a $5,000 cost per project beneficiary.

All projects funded by OCRA will be eligible for funding under a national objective of the Federal Act and requirements of 24 CFR 570.208 and 24 CFR 570.483 of applicable HUD regulations.

K. Section 108 Loan Program: Up to $135 million

During FY 2013, the State of Indiana proposes to pledge up to $135,000,000.00 of its present and future allocation(s) of Small Cities CDBG funds as security for Section 108 loan guarantees provided for under Subpart M of 24 CFR Part 570 (24 CFR 570.700). Applications may be submitted at any time during the year, as long as funds are available from HUD. The minimum loan amount is $1,000,000 and the maximum loan amount is $7,000,000. The state may enter into loan guarantee agreements in support of projects sponsored by an individual local government. Project must meet minimum criteria with respect to equity, collateral and underwriting standards. The CDBG Loan Guarantee Program (Section 108 Program) is an economic and community development financing tool authorized under Section 108 of Title I of the Housing and Community Development Act of 1974, as amended. The program provides a method of assisting non-entitlement local governments with certain unique and large-scale economic development projects that cannot proceed without the loan guarantee. In order to be eligible a project must meet all applicable CDBG requirements and result in significant employment opportunities and/or benefits for low- and moderate-income persons. Unlike the traditional CDBG Program, the Section 108 Program does not operate through assistance from the Office of Community and Rural Affairs (OCRA) or Indiana Housing and Community Development Authority. Rather, funds are raised through OCRA's “Pledge of Grants” to the U.S. Department of Housing and Urban Development (HUD) in order to obtain a federal guarantee of notes issued by the local government. The federally guaranteed notes are sold into private markets through public offerings conducted by HUD. By approving the project, a State pledges its future CDBG funds as the ultimate repayment source should a Section 108 loan default. The State's participation in the Section 108 program does not involve a pledge of Indiana's full faith and credit nor does it commit any funding to the local government. HUD makes the ultimate approval or denial of the federal guarantee.

Only non-entitlement communities that do not receive direct allocations of Community Development Block Grant from the U.S. Department of Housing and Urban Development may apply to the State of Indiana's Community Enhancement and Economic Development Fund, or CEED Fund, and applications for loans from the CEED fund may be only for the project types listed in the CEED Loan Program Guidelines. The total maximum amount of CEED financing that an eligible public entity may receive is limited to $7,000,000. A minimum loan request of $1,000,000 is required.

L. The Urgent Need Fund: $0

The Urgent Need Fund will be available to eligible applicants on a continuing basis. These activities must be eligible for funding under the “urgent need” national objective of the Federal Act and requirements of 24 CFR 570.208 and 24 CFR 570.483 of applicable HUD regulations.

The Urgent Need Fund will be available to eligible applicants to meet an imminent threat to the health and safety of local populations. The grants may be funded as made available through the Public Facilities Program or reversions when not budgeted from the annual allocation. Special selection factors include need, proof of recent threat of a catastrophic nature, statement of declared emergency and inability to fund through other means. Projects will be developed with the assistance of the Office of Community and Rural Affairs as a particular need arises. To be eligible, these projects and their activities must meet the "urgent need" national objective of Section 104(b)(3) of the Federal Act. Generally, projects funded are those, which need immediate attention and are, therefore, inappropriate for consideration under OCRA's regular programs. The types of projects, which typically receive funding, are municipal water systems (where the supply of potable water has been threatened by severe weather conditions) and assistance with demolition or cleanup after a major fire, flood, or other natural disaster. Although all projects will be required to meet the "urgent need" national objective, the Office of Community and Rural Affairs may choose to actually fund the project under one of the other two national objectives, if it deems it expedient to do so. Applicants must adequately document that other financial resources are not available to meet such needs pursuant to Section 104(b)(3) of the Federal Act and 24 CFR 570.483 of HUD regulations.

Only that portion of a project, which addresses an immediate need, should be addressed. This is particularly true of municipal water or sewer system projects, which tend to need major reinvestment in existing plants or facilities, in addition to the correction of the immediate need. The amount of grant award is determined by the individual circumstances surrounding the request for emergency funds. A community may be required to provide a match through cash, debt or provision of employee labor.

The eligibility of any project is at the full discretion of the Office of Community and Rural Affairs.

M. Technical Assistance Set-aside: $271,078

Pursuant to the federal Housing and Community Development Act (Federal Act), specifically Section 106(d)(5), the State of Indiana is authorized to set aside up to one percent (1%) of its total allocation for technical assistance activities. The amount set aside for such Technical Assistance in the State's FY 2013 Consolidated Plan is $271,078, which constitutes one-percent (1%) of the State's FY 2013 CDBG allocation of $27,107,784. The State of Indiana reserves the right to set aside up to one percent (1%) of open prior-year funding amounts for the costs of providing technical assistance on an as-needed basis.

The amount set aside for the Technical Assistance Program will not be considered a planning cost as defined under Section 105(a)(12) of the Federal Act or an administrative cost as defined under Section 105(a)(13) of the Federal Act. Accordingly, such amounts set aside for Technical Assistance will not require matching funds by the State of Indiana. The Department reserves the right to transfer a portion or all of the funding set aside for Technical Assistance to another program hereunder as deemed appropriate by the Office of Community and Rural Affairs, in accordance with the "Program Amendments" provisions of this document. The Technical Assistance Program is designed to provide, through direct Office of Community and Rural Affairs staff resources or by contract, training and technical assistance to units of general local government, nonprofit and for-profit entities relative to community and economic development initiatives, activities and associated project management requirements.

1. **Distribution of the Technical Assistance Program Set-aside:** Pursuant to HUD regulations and policy memoranda, the Office of Community and Rural Affairs may use alternative methodologies for delivering technical assistance to units of local government and nonprofits to carry out eligible activities, to include:

   a. Provide the technical assistance directly with Office of Community and Rural Affairs or other State staff;
   b. Hire a contractor to provide assistance;
   c. Use sub-recipients such as Regional Planning Organizations as providers or securers of the assistance;
   d. Directly allocate the funds to non-profits and units of general local governments to secure/contract for technical assistance.
   e. Pay for tuition, training, and/or travel fees for specific trainees from units of general local governments and nonprofits;
   f. Transfer funds to another state agency for the provision of technical assistance; and,
   g. Contracts with state-funded institutions of higher education to provide the assistance.

2. **Ineligible Uses of the Technical Assistance Program Set-aside:** The 1% set-aside may not be used by the Office of Community and Rural Affairs for the following activities:

   a. Local administrative expenses not related to community development;
   b. Any activity that can not be documented as meeting a technical assistance need;
   c. General administrative activities of the State not relating to technical assistance, such as monitoring state grantees, rating and ranking State applications for CDBG assistance, and drawing funds from the Office of Community and Rural Affairs; or,
   d. Activities that are meant to train State staff to perform state administrative functions, rather than to train units of general local governments and non-profits.

N. Administrative Funds Set-aside: $642,155

The State (Office of Community and Rural Affairs) will set aside $642,155 of its FY 2013 CDBG funds for payment of costs associated with administering its State Community Development Block Grant (CDBG) Program (CFDA Number 14.228). This amount ($642,155) constitutes two-percent (2%) of the State's FY 2013 CDBG allocation ($542,155), plus an amount of $100,000 ($27,107,784 X 0.02 = $542,155 + $100,000 = $642,155). The amount constituted by the 2% set aside ($542,155) is subject to the $1-for-$1 matching requirement of HUD regulations. The $100,000 supplement is not subject to state match. These funds will be used by the Office of Community and Rural Affairs for expenses associated with administering its State CDBG Program, including direct personal services and fringe benefits of applicable Office of Community and Rural Affairs staff, as well as direct and indirect expenses incurred in the proper administration of the state's program and monitoring activities respective to CDBG grants awarded to units of local government (i.e. telephone, travel, services contractual, etc.). These administrative funds will also be used to pay for contractors hired to assist the Office of Community and Rural Affairs in its consolidated planning activities.

PRIOR YEARS' METHODS OF DISTRIBUTION

This Consolidated Plan, statement of Method of Distribution is intended to amend all prior Consolidated Plans for grant years where funds are still available to reflect the new program designs. The Methods of Distribution described in this document will be in effect commencing on July 1, 2013, and ending June 30, 2013, unless subsequently amended, for all FY 2013 CDBG funds as well as remaining residual balances of previous years' funding allocations, as may be amended from time to time subject to the provisions governing "Program Amendments" herein. The existing and amended program budgets for each year are outlined below (administrative fund allocations have not changed and are not shown below). Adjustments in the actual dollars may occur as additional reversions become available.

At this time there are only nominal funds available for reprogramming for prior years' funds. If such funds should become available, they will be placed in the CFF Fund. This will include reversions from settlement of completed grantee projects, there are no fund changes anticipated. For prior years' allocations there is no fund changes anticipated. Non-expended funds, which revert from the financial settlement of projects funded from other programs, will be placed in the Water/Wastewater Program (WWP).

PROGRAM APPLICATION

The Planning Fund/Program (PL) and the Comprehensive Brownfield Redevelopment Program (CBRP) will be conducted through a single-stage, continuous application process throughout the program year. The application process for the Stellar Communities Program, Community Focus Fund (CFF), Water/Wastewater Program (WWP), Public Facilities Program (PFP), Stormwater Improvements Program (SIP) and the Main Street Revitalization Program (MSRP) will be a single competitive application process. Eligible applicants will first submit a short program proposal or letter of intent for such grants. After submitting proposal, eligible projects under the Federal Act will be invited to submit a full application. For each program, the full application will be reviewed and evaluated. The Office of Community and Rural Affairs, as applicable, will provide technical assistance to the communities in the development of proposals and full applications.

An eligible applicant may submit only one application per cycle, per program. Additional applications may be submitted under the other state programs. The Office of Community and Rural Affairs reserves the right to negotiate Planning-Only grants with applicants for applications lacking a credible readiness to proceed on the project or having other planning needs to support a construction project.

OTHER REQUIREMENTS

While administrative responsibility for the Small Cities CDBG program has been assumed by the State of Indiana, the State is still bound by the statutory requirements of the applicable legislation passed by Congress, as well as federal regulations promulgated by the U. S. Department of Housing and Urban Development (HUD) respective to the State's CDBG program as codified under Title 24, Code of the Federal Register. HUD has passed on these responsibilities and requirements to the State and the State is required to provide adequate evidence to HUD that it is carrying out its legal responsibilities under these statutes.

As a result of the Federal Act, applicants who receive funds through the Indiana Office of Community and Rural Affairs selection process will be required to maintain a plan for minimizing displacement of persons as a result of activities assisted with CDBG funds and to assist persons actually displaced as a result of such activities. Applicants are required to provide reasonable benefits to any person involuntarily and permanently displaced as a result of the use of assistance under this program to acquire or substantially rehabilitate property. The State has adopted standards for determining reasonable relocation benefits in accordance with HUD regulations.

CDBG "Program Income" may be generated as a result of grant implementation. The State of Indiana may enter into an agreement with the grantee in which program income is retained by the grantee for eligible activities. Federal guidelines require that program income be spent prior to requesting additional draw downs. Expenditure of such funds requires prior approval from the Office of Community and Rural Affairs (OCRA). The State (Office of Community and Rural Affairs) will follow HUD regulations set forth under 24 CFR 570.489(e) respective to the definition and expenditure of CDBG Program Income.

All statutory requirements will become the responsibility of the recipient as part of the terms and conditions of grant award. Assurances relative to specific statutory requirements will be required as part of the application package and funding agreement. Grant recipients will be required to secure and retain certain information, provide reports and document actions as a condition to receiving funds from the program. Grant management techniques and program requirements are explained in the OCRA's CDBG Grantee Implementation Manual, which is provided to each grant recipient.

Revisions to the Federal Act have mandated additional citizen participation requirements for the State and its grantees. The State has adopted a written Citizen Participation Plan, which is available for interested citizens to review. Applicants must certify to the State that they are following a detailed Citizen Participation Plan which meets Title I requirements. Technical assistance will be provided by the Office of Community and Rural Affairs to assist program applicants in meeting citizen participation requirements.

The State has required each applicant for CDBG funds to certify that it has identified its housing and community development needs, including those of low and moderate income persons and the activities to be undertaken to meet those needs.

INDIANA OFFICE OF COMMUNITY AND RURAL AFFAIRS (OCRA)

The Indiana Office of Community and Rural Affairs intends to provide the maximum technical assistance possible for all of the programs to be funded from the CDBG program. Lieutenant Governor Sue Ellsperman heads the Office of Community and Rural Affairs. Principal responsibility for the CDBG program is vested in Kathleen Weissenberger, Director of Grant Services for OCRA. The Office of Community and Rural Affairs also has the responsibility of administering compliance activities respective to CDBG grants awarded to units of local government.

Primary responsibility for providing "outreach" and technical assistance for the Community Focus Fund, Stellar Communities Program, Main Street Revitalization Fund, Water/Wastewater Program, Public Facilities Program, Stormwater Improvements Program, Comprehensive Brownfield Redevelopment Program and the Planning Fund process resides with the Office of Community and Rural Affairs. Primary responsibility for providing "outreach" and technical assistance for the Housing award process resides with the Indiana Housing & Community Development Authority who will act as the administrative agent on behalf of the Indiana Office of Community and Rural Affairs.

The Business Office will provide internal fiscal support services for program activities, development of the Consolidated Plan and the CAPER. The Grant Services Division of OCRA has the responsibilities for CDBG program management, compliance and financial monitoring of all CDBG programs. The Indiana State Board of Accounts pursuant to the federal Office of Management and Budget Circular A-133 will conduct audits. Potential applicants should contact the Office of Community and Rural Affairs with any questions or inquiries they may have concerning these or any other programs operated by the Office of Community and Rural Affairs.

Information regarding the past use of CDBG funds is available at the:

Indiana Office of Community and Rural Affairs
Office of Community and Rural Affairs
One North Capitol, Suite 600
Indianapolis, Indiana 46204-2288
Telephone: 1-800-824-2476
FAX: (317) 233-6503

DEFINITIONS

Low and moderate income - is defined as 80% of the median family income (adjusted by size) for each county. For a county applicant, this is defined as 80% of the median income for the state. The income limits shall be as defined by the U. S. Department of Housing and Urban Development Section 8 Income Guidelines for "low income families." Certain persons are considered to be "presumptively" low and moderate income persons as set forth under 24 CFR 570.208(a)(2); inquiries as to such presumptive categories should be directed to the OCRA's Grants Management Office, Attention: Ms. Beth Goeb at (317) 232-8831.

Matching funds - local public or private sector in-kind services, cash or debt allocated to the CDBG project. The **minimum** level of local matching funds for Community Focus Fund (CFF) and Planning Program (PL) projects is ten-percent (10%) of the **total estimated project costs**. This percentage is computed by adding the proposed grant amount and the local matching funds amount, and dividing the local matching funds amount by the total sum of the two amounts. The 2013 definition of match has been adjusted to include a maximum of 5% pre-approved and validated in-kind contributions. The balance of the ten (10) percent must be in the form of either cash or debt. Any in-kind over and above the specified 5% may be designated as local effort. Funds provided to applicants by the State of Indiana such as the Build Indiana Fund are not eligible for use as matching funds.

Private investment resulting from CDBG projects does not constitute local match for all OCRA-CDBG programs except the Section 108 Community Enhancement and Economic Development Fund (CEED); such investment will, however, be evaluated as part of the project's impact, and should be documented. The CEED Loan Committee reserves the right to determine sources of matching funds for CEED projects.

Proposal (synonymous with "pre-application") - A document submitted by a community which briefly outlines the proposed project, the principal parties, and the project budget and how the proposed project will meet a goal of the Federal Act. If acceptable, the community may be invited to submit a full application.

Reversions - Funds placed under contract with a community but not expended for the granted purpose because expenses were less than anticipated and/or the project was amended or canceled and such funds were returned to the Office of Community and Rural Affairs upon financial settlement of the project.

Slums or Blight - an area/parcel which: (1) meets a definition of a slum, blighted, deteriorated, or deteriorating area under state or local law (Title 36-7-1-3 of Indiana Code); and (2) meets the requirements for "area basis" slum or blighted conditions pursuant to 24 CFR 570.208(b)(1) and 24 CFR 570.483(c)(1), or "spot basis" blighted conditions pursuant to 24 CFR 570.208(b)(2) and 24 CFR 570.483(c)(2).

Urgent Need - is defined as a serious and immediate threat to health and welfare of the community. The Chief Elected Official must certify that an emergency condition exists and requires immediate resolution and that alternative sources of financing are not available. An application for CDBG funding under the "urgent need" CDBG national objective must adhere to all requirements for same set forth under 24 CFR 570.208(c) and 24 CFR 570.483(d).

ATTACHMENT B

DISPLACEMENT PLAN

1. The State shall fund only those applications, which present projects and activities, which will result in the displacement of as few persons or businesses as necessary to meet the goals and objectives of the state and local CDBG-assisted program.

2. The State will use this criterion as one of the guidelines for project selection and funding.

3. The State will require all funded communities to certify that the funded project is minimizing displacement.

4. The State will require all funded communities to maintain a local plan for minimizing displacement of persons or businesses as a result of CDBG funded activities, pursuant to the federal Uniform Relocation and Acquisitions Policies Act of 1970, as amended.

5. The State will require that all CDBG funded communities provide assistance to all persons displaced as a result of CDBG funded activities.

6. The State will require each funded community to provide reasonable benefits to any person involuntarily and permanently displaced as a result of the CDBG funded program.

GENERAL SELECTION CRITERIA

The Office of Community and Rural Affairs (OCRA) will consider the following general criteria when evaluating a project proposal. Although projects will be reviewed for this information at the proposal stage, no project will be eliminated from consideration if the criteria are not met. Instead, the community will be alerted to the problem(s) identified. Communities must have corrected any identified deficiencies by the time of application submission for that project to be considered for funding.

A. General Criteria (all programs - see exception for program income and housing projects through the IHCDA in 7 below):

1. The applicant must be a legally constituted general purpose unit of local government and eligible to apply for the state program.

2. The applicant must possess the legal capacity to carry out the proposed program.

3. If the applicant has previously received funds under CDBG, they must have successfully carried out the program. An applicant must not have any overdue closeout reports, State Board of Accounts OMB A-133 audit findings or unresolved OCRA/IHCDA monitoring findings (where the community is responsible for resolution.) Any determination of "overdue" is solely at the discretion of the Indiana Office of Community and Rural Affairs.

4. An applicant must not have any overdue CDBG semi-annual Grantee Performance Reports, subrecipient reports or other reporting requirements of the OCRA/IHCDA. Any determination of "overdue" is solely at the discretion of the Indiana Office of Community and Rural Affairs.

5. The applicant must clearly show the manner in which the proposed project will meet one of the three national CDBG objectives and meet the criteria set forth under 24 CFR 570.483.

6. The applicant must show that the proposed project is an eligible activity under the Act.

7. The applicant must first encumber/expend all CDBG program income receipts before applying for additional grant funds from the Office of Community and Rural Affairs; EXCEPTION – these general criteria will not apply to applications made directly to the Indiana Housing & Community Development Authority (IHCDA) for CDBG-funded housing projects.

B. Community Focus Fund (CFF), Main Street Revitalization Program (MSRP), Stellar Communities Program (SCP), Water/Wastewater Improvements Program (WWP), Public Facilities Program (PFP), Stormwater Improvements Program (SIP) Comprehensive Brownfield Redevelopment Program (CBRP) and Planning Fund (PL):

1. To be eligible to apply at the time of application submission, an applicant must not have any:

    a. Overdue grant reports, subrecipient reports or project closeout documents; or

    b. More than one open or pending CFF, MSRP, SCP, WWP, PFP, SIP, CBRP or PL grant (Indiana cities and incorporated towns).

    c. For those applicants with one open CFF, MSRP, WWP, PFP, SIP or CBRP a "Notice of Release of Funds and Authorization to Incur Costs" must have been issued for the construction activities under the open CFF, MSRP, WWP, PFP, SIP or CBRP contract, and a contract for construction of the principal (largest funding amount) construction line item (activity) must have been executed prior to the deadline established by OCRA for receipt of applications for funding.

d. For those applicants who have open Planning Fund grants, the community must have final plan approved by the Office of Community and Rural Affairs prior to submission of a CFF, MSRP, SCP, WWP, PFP, CBRP or SIP application for the project.

e. An Indiana county may have two (2) open CDBG grants and apply for a third grant. A county may have only three (3) open CDBG grants. All criteria outlined in c and d above must be met.

2. The cost/beneficiary ratio for all CDBG funds will be maintained at $5,000. Housing-related projects are to be submitted directly to the Indiana Housing & Community Development Authority (IHCDA) under its programs.

3. At least 10% leveraging (as measured against the CDBG project, see definitions) must be proposed. The Indiana Office of Community and Rural Affairs may rule on the suitability and eligibility of such leveraging.

4. The applicant may only submit one proposal or application per round per program. Counties may submit either for their own project or an “on-behalf-of” application for projects of other eligible applicants within the county. However, no application will be invited from an applicant where the purpose is clearly to circumvent the “one application per round” requirement for other eligible applicants.

5. The application must be complete and submitted by the announced deadline.

C. Housing Programs: Refer to Method of Distribution for Indiana Housing & Community Development Authority within this FY 2013 Consolidated Plan

ATTACHMENT D

GRANT EVALUATION CRITERIA
Community Focus Fund (CFF) and Planning Grant (PL)
750 POINTS TOTAL

Community Focus Fund (CFF) and Planning Grant (PL) applications must achieve a minimum score of 450 points (60%) to be eligible for award.

NATIONAL OBJECTIVE SCORE (200 POINTS):

Depending on the National Objective to be met by the project, one of the following two mechanisms will be used to calculate the score for this category.

1. National Objective = Benefit to Low- and Moderate-Income Persons: 200 points maximum awarded according to the percentage of low- and moderate-income individuals to be served by the project. The total points given are computed as follows:

National Objective Score = % Low/Mod Beneficiaries X 2.5

The point total is capped at 200 points or 80% low/moderate beneficiaries, i.e., a project with 80% or greater low/moderate beneficiaries will receive 200 points. Below 80% benefit to low/moderate-income persons, the formula calculation will apply.

2. National Objective = Prevention or Elimination of Slums or Blight: 200 points maximum awarded based on the characteristics listed below. The total points given are computed as follows:

National Objective Score = (Total of the points received in each category below) X 2.5

___ Applicant has a Slum/Blight Resolution for project area (50 pts.)

___ The project site is a brownfield* (10 pts.)

___ The building or district is listed on the Indiana or National Register of Historic Places** (10 pts.)

___ The building or district is eligible for listing on the Indiana or National Register of Historic Places** (10 pts.)

___ The building is on the Historic Landmarks Foundation of Indiana's "10 Most Endangered List" (15 pts.)

* The State of Indiana defines a brownfield as an industrial or commercial property that is abandoned, inactive, or underutilized, on which expansion or redevelopment is complicated due to actual or perceived environmental contamination.

Project may either be listed on **<u>or</u> eligible for listing on the Indiana or National Register of Historic Places. ***Both cannot be checked.***

COMMUNITY DISTRESS FACTORS (175 POINTS):

Various factors are used to determine the distress of a community. IOCRA has partnered with Stats Indiana, an Indiana University entity to analyze and calculate the distress of Indiana's small cities, towns, counties and townships. Factors used to calculate the Community Distress points used for CDBG scoring include:

Percentage of Households with Income under Poverty Level
Median Household Income
Percent of Housing Units that are Vacant

Median Home Value

Unemployment Rate

Labor Force Participation

Local government scores, which are updated and published annually, can be found at: www.stats.indiana.edu.

LOCAL MATCH CONTRIBUTION (50 POINTS):

A maximum of 50 points based on the percentage of local funds devoted to the project. This total is determined as follows:

Total Match Points = % Eligible Local Match X 1

The points total is capped at 50 points or 50% match, i.e., a project with 50% match or greater will receive 50 points. Below 50% match, the formula calculation will apply.

Eligible local match can be local cash, debt or in-kind sources. Federal, state, and local government grants are considered eligible match. In-kind sources may provide eligible local match for the project, but the amount that can be counted as local match is limited to 5% of the total project budget or a maximum of $25,000. Use of in-kind donations as eligible match requires approval from the Indiana Office of Community and Rural Affairs, Division approximately 2 weeks prior to application submission (deadline will be announced each round).

PROJECT DESIGN FACTORS (300 POINTS):

300 points maximum awarded according to the evaluation in three areas:

Project Description – is the project clearly defined as to determine eligibility? – 50 points
Project Need - is the community need for this project clearly documented? – 125 points
Financial Impact - why is grant assistance necessary to complete this project? – 125 points

The points in these categories are awarded by the OCRA review team when evaluating the projects**. Applicants should address all Project Development Issues associated with their project type.** Applicants should work with their OCRA community liaison to identify ways to increase their project's scores in these areas.

LEVERAGING PHILANTHROPIC CAPITAL (25 POINTS):

Points are assigned based on Philanthropic contribution as a percentage of total project costs.

0- ½ %	0 pts
½ - 1%	10 pts
1-1½%	15 pts
1 ½ -2%	20 pts
2%+	25 pts

POINTS REDUCTION POLICY:

It is the policy of OCRA not to fund more than one phase or component of a single project type in different funding rounds. This applies to all project types, although it is particularly relevant to utility projects. If a community needs to phase a project in order to complete it, they should consider which phase would be most appropriate for CFF assistance. Even if a community doesn't intentionally phase a project, OCRA will take into account previously awarded projects for the same project type. A Community that has previously been awarded a grant for the same project type will likely not be competitive and will be subject to the follow point reduction. This applies to all project types, although it is particularly relevant to utility projects.

0 – 5 years since previous funding – 50pts
5 – 7 years since previous funding – 25pts

Example:
Community submits and receives a CFF award for a new water tower in Round I of 2009. When applying for a water system upgrade (or a new water tower because the one they purchased failed) in Round I of 2014, they would be subject to a point reduction of 50pts. In Round II of 2014 they would be subject to a point reduction of 25pts. Round II of 2016 they would have no point reduction.

GRANT EVALUATION CRITERIA – 750 POINTS TOTAL
Main Street Revitalization Program (MSRP)
Round 1 Only

Main Street Revitalization Grant Program applications (MSRGP) must achieve a minimum score of 450 points (60%) to be eligible for award.

NATIONAL OBJECTIVE SCORE (150 POINTS):

Elimination of Slums or Blight: 150 points maximum awarded based on the characteristics listed below. The total points given are computed as follows:

National Objective Score = (Total of the points received in each category below) X 3

___ Community is designated as a Nationally Accredited Indiana Main Street Organization. (10 pts.)

___ The Indiana Main Street Organization is in good standing for meeting all the reporting requirements. (10 pts.)

___ The Indiana Main Street Organization has attended all required workshops associated with the Indiana Main Street Program during past year. (10 pts.)

___ The Community has completed a downtown revitalization plan within the past five years. (5 pts.)

___ The Indiana Main Street Organization has a business recruitment/retention plan. (5 pts.)

___ The building or district is listed on the Indiana or National Register of Historic Places** (10 pts.)

___ The building or district is eligible for listing on the Indiana or National Register of Historic Places** (10 pts.)

Project may either be listed on **or eligible for listing on the Indiana or National Register of Historic Places. ***Both cannot be checked.***

COMMUNITY DISTRESS FACTORS (175 POINTS):

Various factors are used to determine the distress of a community. IOCRA has partnered with Stats Indiana, an Indiana University entity to analyze and calculate the distress of Indiana's small cities, towns, counties and townships. Factors used to calculate the Community Distress points used for CDBG scoring include:

Percentage of Households with Income under Poverty Level
Median Household Income
Percent of Housing Units that are Vacant

Median Home Value

Unemployment Rate

Labor Force Participation

Local government scores, which are updated and published annually, can be found at: www.stats.indiana.edu.

<u>LOCAL MATCH CONTRIBUTION (50 POINTS):</u>

A maximum of 50 points based on the percentage of local funds devoted to the project. This total is determined as follows:

Total Match Points = % Eligible Local Match X 1

The points total is capped at 50 points or 50% match, i.e., a project with 50% match or greater will receive 50 points. Below 50% match, the formula calculation will apply.

Eligible local match can be local cash, debt or in-kind sources. Federal, state, and local government grants are considered eligible match. In-kind sources may provide eligible local match for the project, but the amount that can be counted as local match is limited to 5% of the total project budget or a maximum of $25,000. Use of in-kind donations as eligible match requires approval from the Indiana Office of Community and Rural Affairs, Grant Services Division <u>approximately 2 weeks prior to application submission (deadline will be announced each round)</u>.

<u>PROJECT DESIGN FACTORS (350 POINTS):</u>

350 points maximum awarded according to the evaluation in three areas:

Project Description – is the project clearly defined as to determine eligibility? – 50 points
Project Need - is the community need for this project clearly documented? – 150 points
Financial Impact - why is grant assistance necessary to complete this project? – 150 points

The points in these categories are awarded by the OCRA review team when evaluating the projects**. <u>Applicants should address all Project Development Issues associated with their project type</u>.** Applicants should work with their OCRA community liaison to identify ways to increase their project's scores in these areas.

<u>LEVERAGING PHILANTHROPIC CAPITAL (25 POINTS):</u>

Points are assigned based on Philanthropic contribution as a percentage of total project costs.

0- ½ %	0 pts
½ - 1%	10 pts
1-1½%	15 pts
1 ½ -2%	20 pts
2%+	25 pts

<u>POINTS REDUCTION POLICY:</u>

It is the policy of OCRA not to fund more than one phase or component of a single project type in different funding rounds. This applies to all project types, although it is particularly relevant to utility projects. If a community needs to phase a project in order to complete it, they should consider which phase would be most appropriate for CDBG assistance. Even if a community doesn't intentionally phase a project, OCRA will take into account previously awarded projects for the same project type. A Community that has previously been awarded a grant for the same project type will likely not be competitive and will be subject to the follow point reduction. For all projects awarded under the previous CFF program, the CFF point reduction policy will apply. Projects funded under the MSRGP will also have a point reduction as stated below.

<u>MSRP Point Reduction Policy</u>
0-4 years since previous funding – 50 pts

Example:
Community submits and receives a MSRP award for a streetscape project in Round I of 2013. When applying for facade rehabilitation in Round I of 2017, they would be subject to a point reduction of 50 points. Round I of 2018 they would have no point reduction.

GRANT EVALUATION CRITERIA – 700 POINTS TOTAL
Main Street Revitalization Program (MSRP)
Round 2 Only

Main Street Revitalization Program applications (MSRP) must achieve a minimum score of 400 points to be eligible for award.

THRESHOLD REQUIREMENTS:

Each applicant must meet the following prerequisites:

1) Have a designated Indiana Main Street Organization;
2) The Main Street Organization is in good standing for meeting all the reporting requirements;
3) The Main Street Organization has attended all required workshops associated with the Indiana Main Street Program during past year;
4) The Main Street organization is functioning within the Main Street 4 Point Approach of Organization, Design, Economic Restructuring, and Promotion;
5) The Main Street organization has current Work Plans for each of its Committees that have been submitted to Indiana Main Street;
6) The Main Street Organization has a business recruitment/retention plan that is approved by the Indiana Main Street Program;
7) The project must be part of the Main Street Organization's overall strategy;
8) The Community has completed a downtown revitalization plan within the past five years that meets OCRA's Minimum Technical Requirements.

COMMUNITY DISTRESS FACTORS (175 POINTS):

Various factors are used to determine the distress of a community. IOCRA has partnered with Stats Indiana, an Indiana University entity to analyze and calculate the distress of Indiana's small cities, towns, counties and townships. Factors used to calculate the Community Distress points used for CDBG scoring include:

Percentage of Households with Income under Poverty Level
Median Household Income
Percent of Housing Units that are Vacant

Median Home Value

Unemployment Rate

Labor Force Participation

Local government scores, which are updated and published annually, can be found at: www.stats.indiana.edu.

LOCAL MATCH CONTRIBUTION (100 POINTS):

A maximum of 100 points based on the percentage of local funds devoted to the project. This total is determined as follows:

Total Match Points = % Eligible Local Match X 2

Eligible local match can be local cash, debt or in-kind sources. Federal, state, and local government grants are considered eligible match. In-kind sources may provide eligible local match for the project, but the amount that can be counted as local match is limited to 5% of the total project budget or a maximum of $25,000. Use of in-kind donations as eligible match requires approval from the Indiana Office of Community and Rural Affairs, Grant Services Division approximately 2 weeks prior to application submission (deadline will be announced each round).

MAIN STREET SCORE (50 POINTS):

Main Street Score: 50 points maximum awarded based on the characteristics listed below. The total points given are computed as follows:

___ Community is designated as a Nationally Accredited Indiana Main Street Organization. (20 pts.)

___ The Main Street Organization has a long-term Strategic Plan. (10 pts.)

___ The district is listed on the Indiana or National Register of Historic Places** (10 pts.)

___ The district is eligible for listing on the Indiana or National Register of Historic Places** (5 pts.)

___ The Main Street Organization has a fundraising plan in place. (5 pts.)

Project may either be listed on **or eligible for listing on the Indiana or National Register of Historic Places. ***Both cannot be checked.***

PROJECT DESIGN FACTORS (300 POINTS):

300 points maximum awarded according to the evaluation in three areas:

Project Description – is the project clearly defined as to determine eligibility? – 50 points
Project Need - is the community need for this project clearly documented? – 125 points
Financial Impact - why is grant assistance necessary to complete this project? – 125 points

The points in these categories are awarded by the OCRA review team when evaluating the projects**. Applicants should address all Project Development Issues associated with their project type.** Applicants should work with their OCRA community liaison to identify ways to increase their project's scores in these areas.

PROJECT SUSTAINABILITY (50 POINTS):

A maximum of 50 points for the establishment of a (or documentation of existing) permanent Main Street Fund to be used for ongoing downtown revitalization activities such as a revolving loan program, grant program, events, etc.

0 points – under $3,000 philanthropic fund
25 points - $3,000-$5,000 philanthropic fund
50 points - $5,000 or higher philanthropic fund

LEVERAGING PHILANTHROPIC CAPITAL (25 POINTS):

Points are assigned based on Philanthropic contribution as a percentage of total project costs.

1- ½ %	0 pts
½ - 1%	10 pts
1-1½%	15 pts
1 ½ -2%	20 pts
2%+	25 pts

POINTS REDUCTION POLICY:

It is the policy of OCRA not to fund more than one phase or component of a single project. If a community needs to phase a project in order to complete it, they should consider which phase would be most appropriate for CDBG assistance. Even if a community doesn't intentionally phase a project, OCRA will take into account previously awarded projects for the same project type.

A Community that has previously been awarded a grant for the same project type will likely not be competitive and will be subject to the follow point reduction.

MSRP Point Reduction Policy
0-7 years since previous funding – 50 pts

Example:
Community submits and receives a MSRP award for a streetscape project in 2014. When applying for facade rehabilitation in 2021, they would be subject to a point reduction of 50 points. In 2022 they would have no point reduction.

GRANT EVALUATION CRITERIA
600 POINTS TOTAL

Based on public comments received, the State intends to amend this program prior to implementation.

Water/Wastewater Partnership Program (WWP) applications must achieve a minimum score of 350 points to be eligible for award.

COMMUNITY DISTRESS FACTORS (175 POINTS):

Various factors are used to determine the distress of a community. IOCRA has partnered with Stats Indiana, an Indiana University entity to analyze and calculate the distress of Indiana's small cities, towns, counties and townships. Factors used to calculate the Community Distress points used for CDBG scoring include:

Percentage of Households with Income under Poverty Level
Median Household Income
Percent of Housing Units that are Vacant

Median Home Value

Unemployment Rate

Labor Force Participation

Local government scores, which are updated and published annually, can be found at: www.stats.indiana.edu.

LOCAL MATCH CONTRIBUTION (100 POINTS):

A maximum of 100 points based on the percentage of local funds devoted to the project. This total is determined as follows:

Total Match Points = % Eligible Local Match X 1

The points total is capped at 100 points or 100% match, i.e., a project with 75% match will receive 75 points.

Eligible local match can be local cash, debt or in-kind sources. Federal, state, and local government grants are considered eligible match. In-kind sources may provide eligible local match for the project, but the amount that can be counted as local match is limited to 5% of the total project budget or a maximum of $25,000. Use of in-kind donations as eligible match requires approval from the Indiana Office of Community and Rural Affairs, Grant Services Division approximately 2 weeks prior to application submission (deadline will be announced each round).

PROJECT DESIGN FACTORS (300 POINTS):

300 points maximum awarded according to the evaluation in three areas:

Project Description – is the project clearly defined as to determine eligibility? – 50 points
Project Need - is the community need for this project clearly documented? – 125 points
Financial Impact - why is grant assistance necessary to complete this project? – 125 points

The points in these categories are awarded by the OCRA review team when evaluating the projects**. <u>Applicants should address all Project Development Issues associated with their project type</u>.** Applicants should work with their OCRA community liaison to identify ways to increase their project's scores in these areas.

<u>FINANCIAL GAP (25 POINTS):</u>

A maximum of 25 points awarded per $1.00 in financial gap.

OCRA GAP CALCULATION

1. Grant Amount Requested	____________
2. Debt Coverage Factor (assume 25%)	____________
3. Total Funds Needed (multiply line 1 by 1.25)	____________
4. Amortization Constant (4.5% APR)	.00633
5. Monthly Payment (multiply line 3 by line 4)	____________
6. O/M Cost Factor (multiply line 5 by .05)	____________
7. Total Monthly Costs (add lines 5 and 6)	____________
8. Number of Users	____________
9. Monthly Rate Impact (divide line 7 by line 8)	____________

The result on line 9 should give you the amount that your community would have to increase the monthly rate charged to each customer without grant assistance, given the above assumptions. This is the "gap", which is the amount by which grant funds will reduce or "buy down" your utility rates. <u>This amount added to the actual rates anticipated with OCRA grant funds will give you the rates needed "without OCRA grant funds".</u>

<u>POINTS REDUCTION POLICY:</u>

It is the policy of OCRA not to fund more than one phase or component of a single project type in different funding rounds. This applies to all project types, although it is particularly relevant to utility projects. If a community needs to phase a project in order to complete it, they should consider which phase would be most appropriate for CDBG assistance. Even if a community doesn't intentionally phase a project, OCRA will take into account previously awarded projects for the same project type. A Community that has previously been awarded a grant for the same project type will likely not be competitive and will be subject to the follow point reduction.

0 – 5 years since previous funding – 50pts
5 – 7 years since previous funding – 25pts

Example:
Community submits and receives a CDBG award for a new water tower in 2013. When applying for a project consisting of replacing water lines in 2018, they would be subject to a point reduction of 50pts. In 2020 they would be subject to a point reduction of 25pts. In 2021 they would have no point reduction.

GRANT EVALUATION CRITERIA
600 POINTS TOTAL

Comprehensive Brownfield Redevelopment Program (CBRP) applications are accepted on a rolling or ongoing basis. All applications must achieve a minimum score of 350 points to be eligible for award.

COMMUNITY DISTRESS FACTORS (175 POINTS):

Various factors are used to determine the distress of a community. IOCRA has partnered with Stats Indiana, an Indiana University entity to analyze and calculate the distress of Indiana's small cities, towns, counties and townships. Factors used to calculate the Community Distress points used for CDBG scoring include:

Percentage of Households with Income under Poverty Level
Median Household Income
Percent of Housing Units that are Vacant

Median Home Value

Unemployment Rate

Labor Force Participation

Local government scores, which are updated and published annually, can be found at: www.stats.indiana.edu.

LOCAL MATCH CONTRIBUTION (50 POINTS):

A maximum of 50 points based on the percentage of local funds devoted to the project. This total is determined as follows:

Total Match Points = % Eligible Local Match X 1

The points total is capped at 50 points or 50% match, i.e., a project with 50% match or greater will receive 50 points. Below 50% match, the formula calculation will apply.

Eligible local match can be local cash, debt or in-kind sources. Federal, state, and local government grants are considered eligible match. In-kind sources may provide eligible local match for the project, but the amount that can be counted as local match is limited to 5% of the total project budget or a maximum of $25,000. Use of in-kind donations as eligible match requires approval from the Indiana Office of Community and Rural Affairs, Grant Services Division approximately 2 weeks prior to application submission (deadline will be announced each round).

PROJECT DESIGN FACTORS (300 POINTS):

300 points maximum awarded according to the evaluation in three areas:

Project Description – is the project clearly defined as to determine eligibility? – 50 points
Project Need - is the community need for this project clearly documented? – 125 points
Financial Impact - why is grant assistance necessary to complete this project? – 125 points

The points in these categories are awarded by the OCRA review team when evaluating the projects**. Applicants should address all Project Development Issues associated with their project type.** Applicants should work with their OCRA community liaison to identify ways to increase their project's scores in these areas.

IFA REGISTRY (25 POINTS):

A maximum of 25 points awarded for projects listed on the IFA Brownfield registry which indicates prior involvement of the Indiana Brownfield Program.

SITE DEVELOPMENT PLAN (50 POINTS):

A maximum of 50 points will be awarded for projects that have a site development plan for the future use of the Brownfield site.

POINTS REDUCTION POLICY:

It is the policy of OCRA not to fund more than one phase or component of a single project type in different funding rounds. This applies to all project types, although it is particularly relevant to utility projects. If a community needs to phase a project in order to complete it, they should consider which phase would be most appropriate for CDBG assistance. Even if a community doesn't intentionally phase a project, OCRA will take into account previously awarded projects for the same project type. A Community that has previously been awarded a grant for the same project type will likely not be competitive and will be subject to the follow point reduction. This applies to all project types, although it is particularly relevant to utility projects.

0 – 5 years since previous funding – 50pts
5 – 7 years since previous funding – 25pts

GRANT EVALUATION CRITERIA
700 POINTS TOTAL

Public Facilities Program (PFP) applications must achieve a minimum score of 400 points to be eligible for award.

NATIONAL OBJECTIVE SCORE (100 POINTS):

Depending on the National Objective to be met by the project, one of the following two mechanisms will be used to calculate the score for this category.

National Objective = Benefit to Low- and Moderate-Income Persons: 100 points maximum awarded according to the percentage of low- and moderate-income individuals to be served by the project. The total points given are computed as follows:

National Objective Score = % Low/Mod Beneficiaries

The point total is capped at 100 points or 100% low/moderate beneficiaries, i.e., a project with 100% or greater low/moderate beneficiaries will receive 100 points. Below 100% benefit to low/moderate-income persons, the formula calculation will apply.

COMMUNITY DISTRESS FACTORS (175 POINTS):

Various factors are used to determine the distress of a community. IOCRA has partnered with Stats Indiana, an Indiana University entity to analyze and calculate the distress of Indiana's small cities, towns, counties and townships. Factors used to calculate the Community Distress points used for CDBG scoring include:

Percentage of Households with Income under Poverty Level
Median Household Income
Percent of Housing Units that are Vacant

Median Home Value

Unemployment Rate

Labor Force Participation

Local government scores, which are updated and published annually, can be found at: www.stats.indiana.edu.

LOCAL MATCH CONTRIBUTION (50 POINTS):

A maximum of 50 points based on the percentage of local funds devoted to the project. This total is determined as follows:

Total Match Points = % Eligible Local Match X 1

The points total is capped at 50 points or 50% match, i.e., a project with 50% match or greater will receive 50 points. Below 50% match, the formula calculation will apply.

Eligible local match can be local cash, debt or in-kind sources. Federal, state, and local government grants are considered eligible match. In-kind sources may provide eligible local match for the project, but the amount that can be counted as local match is limited to 5% of the total project budget or a maximum of $25,000. Use of in-kind donations as eligible match requires approval from the Indiana Office of Community and Rural Affairs, Grant Services

Division approximately 2 weeks prior to application submission (deadline will be announced each round).

PROJECT DESIGN FACTORS (300 POINTS):

300 points maximum awarded according to the evaluation in three areas:

Project Description – is the project clearly defined as to determine eligibility? – 50 points
Project Need - is the community need for this project clearly documented? – 125 points
Financial Impact - why is grant assistance necessary to complete this project? – 125 points

The points in these categories are awarded by the OCRA review team when evaluating the projects**. Applicants should address all Project Development Issues associated with their project type.** Applicants should work with their OCRA community liaison to identify ways to increase their project's scores in these areas.

LEVERAGING PHILANTHROPIC CAPITAL (25 POINTS):

Points are assigned based on Philanthropic contribution as a percentage of total project costs.

1- ½ %	0 pts
½ - 1%	10 pts
1-1½%	15 pts
1 ½ -2%	20 pts
2%+	25 pts

COMMUNITY FACILITY PHILANTHROPIC FUND (50 POINTS):

A maximum of 50 points for the establishment of a (or documentation of existing) permanent Community Facility Philanthropic Fund, to be used for ongoing operation and maintenance activities.

0 points – under $3,000 philanthropic fund
25 points - $3,000-$5,000 philanthropic fund
50 points - $5,000 or higher philanthropic fund

POINTS REDUCTION POLICY:

It is the policy of OCRA not to fund more than one phase or component of a single project type in different funding rounds. This applies to all project types, although it is particularly relevant to utility projects. If a community needs to phase a project in order to complete it, they should consider which phase would be most appropriate for CFF assistance. Even if a community doesn't intentionally phase a project, OCRA will take into account previously awarded projects for the same project type. A Community that has previously been awarded a grant for the same project type will likely not be competitive and will be subject to the follow point reduction. This applies to all project types, although it is particularly relevant to utility projects.

0 – 5 years since previous funding – 50pts
5 – 7 years since previous funding – 25pts

Example:
Community submits and receives a PFP award for a new library in 2014. When applying for the construction of a library addition in 2019, they would be subject to a point reduction of 50pts. In 2021 they would be subject to a point reduction of 25pts. In 2022 they would have no point reduction.

GRANT EVALUATION CRITERIA
700 POINTS TOTAL

Stormwater Improvements Program (SIP) applications must achieve a minimum score of 400 points to be eligible for award.

NATIONAL OBJECTIVE SCORE (100 POINTS):

Depending on the National Objective to be met by the project, one of the following two mechanisms will be used to calculate the score for this category.

National Objective = Benefit to Low- and Moderate-Income Persons: 100 points maximum awarded according to the percentage of low- and moderate-income individuals to be served by the project. The total points given are computed as follows:

National Objective Score = % Low/Mod Beneficiaries

The point total is capped at 100 points or 100% low/moderate beneficiaries, i.e., a project with 100% or greater low/moderate beneficiaries will receive 100 points. Below 100% benefit to low/moderate-income persons, the formula calculation will apply.

COMMUNITY DISTRESS FACTORS (175 POINTS):

Various factors are used to determine the distress of a community. IOCRA has partnered with Stats Indiana, an Indiana University entity to analyze and calculate the distress of Indiana's small cities, towns, counties and townships. Factors used to calculate the Community Distress points used for CDBG scoring include:

Percentage of Households with Income under Poverty Level
Median Household Income
Percent of Housing Units that are Vacant

Median Home Value

Unemployment Rate

Labor Force Participation

Local government scores, which are updated and published annually, can be found at: www.stats.indiana.edu.

LOCAL MATCH CONTRIBUTION (75 POINTS):

A maximum of 75 points based on the percentage of local funds devoted to the project. This total is determined as follows:

Total Match Points = % Eligible Local Match X 1

The points total is capped at 75 points or 75% match, i.e., a project with 75% match or greater will receive 75 points. Below 75% match, the formula calculation will apply.

Eligible local match can be local cash, debt or in-kind sources. Federal, state, and local government grants are considered eligible match. In-kind sources may provide eligible local match for the project, but the amount that can be counted as local match is limited to 5% of the total project budget or a maximum of $25,000. Use of in-kind donations as eligible match requires approval from the Indiana Office of Community and Rural Affairs, Grant Services

Division approximately 2 weeks prior to application submission (deadline will be announced each round).

PROJECT DESIGN FACTORS (300 POINTS):

300 points maximum awarded according to the evaluation in three areas:

Project Description – is the project clearly defined as to determine eligibility? – 50 points
Project Need - is the community need for this project clearly documented? – 125 points
Financial Impact - why is grant assistance necessary to complete this project? – 125 points

The points in these categories are awarded by the OCRA review team when evaluating the projects**. Applicants should address all Project Development Issues associated with their project type.** Applicants should work with their OCRA community liaison to identify ways to increase their project's scores in these areas.

SUSTAINABILITY (50 POINTS):

A maximum of 50 points for the establishment of, or documentation of existing sustainability plan for the ongoing operation and maintenance activities of the stormwater system.

0 points – under $3 monthly stormwater utility user rate
25 points – $3-$5 monthly stormwater utility user rate
50 points - $5 or higher monthly stormwater utility user rate

POINTS REDUCTION POLICY:

It is the policy of OCRA not to fund more than one phase or component of a single project type in different funding rounds. This applies to all project types, although it is particularly relevant to utility projects. If a community needs to phase a project in order to complete it, they should consider which phase would be most appropriate for CDBG assistance. Even if a community doesn't intentionally phase a project, OCRA will take into account previously awarded projects for the same project type. A Community that has previously been awarded a grant for the same project type will likely not be competitive and will be subject to the follow point reduction.

0 – 5 years since previous funding – 50pts
5 – 7 years since previous funding – 25pts

Example:
Community submits and receives a CFF award for a stormwater system project in 2013. When applying for a SIP project in 2018, they would be subject to a point reduction of 50pts. In 2020 they would be subject to a point reduction of 25pts. In 2021 they would have no point reduction.

CITIZEN PARTICIPATION PLAN
INDIANA OFFICE OF COMMUNITY AND RURAL AFFAIRS (STATE)

The State of Indiana, Office of Community and Rural Affairs, pursuant to 24 CFR 91.115, 24 CFR 570.431 and 24 CFR 570.485(a) wishes to encourage maximum feasible opportunities for citizens and units of general local government to provide input and comments as to its Methods of Distribution set forth in the Office of Community and Rural Affairs' annual Consolidated Plan for CDBG funds submitted to HUD as well as the Office of Community and Rural Affairs' overall administration of the State's Small Cities Community Development Block Grant (CDBG) Program. In this regard, the Office of Community and Rural Affairs will perform the following:

1. Require each unit of general local government to comply with citizen participation requirements for such governmental units as specified under 24 CFR 570.486(a), to include the requirements for accessibility to information/records and to furnish citizens with information as to proposed CDBG funding assistance as set forth under 24 CFR 570.486(a)(3), provide technical assistance to representatives of low-and-moderate income groups, conduct a minimum of two (2) public hearings on proposed projects to be assisted by CDBG funding, such hearings being accessible to handicapped persons, provide citizens with reasonable advance notice and the opportunity to comment on proposed projects as set forth in Title 5-3-1 of Indiana Code, and provide interested parties with addresses, telephone numbers and times for submitting grievances and complaints.

2. Consult with local elected officials and the Office of Community and Rural Affairs Grant Administrator Networking Group in the development of the Method of distribution set forth in the State's Consolidated Plan for CDBG funding submitted to HUD.

3. Publish a proposed or "draft" Consolidated Plan and afford citizens and units of general local government the opportunity to comment thereon.

4. Furnish citizens and units of general local government with information concerning the amount of CDBG funds available for proposed community development and housing activities and the range/amount of funding to be used for these activities.

5. Hold one (1) or more public hearings respective to the State's proposed/draft Consolidated Plan, on amendments thereto, duly advertised in newspapers of general circulation in major population areas statewide pursuant to I.C. 5-3-1-2 (B), to obtain the views of citizens on proposed community development and housing needs. The Consolidated Plan Committee published the enclosed legal advertisement to thirteen (13) regional newspapers of general circulation statewide respective to the public hearings held on the 2013 Consolidated Plan. In addition, this notice was distributed by email to over 1,000 local officials, non-profit entities, and interested parties statewide in an effort to maximize citizen participation in the FY 2013 consolidated planning process:

The Republic, Columbus, IN
The Corydon Democrat and Clarian News, Corydon, IN
Indianapolis Star, Indianapolis, IN
The Journal-Gazette, Fort Wayne, IN
The Salem Leader and Salem Democrat, Salem, IN
Scott County Journal, Scottsburg, IN
The News and Tribune, Jeffersonville, IN
The Chronicle-Tribune, Wabash, IN
Gary Post Tribune, Gary, IN
Tribune Star, Terre Haute, IN
Journal & Courier, Lafayette, IN
Evansville Courier, Evansville, IN
South Bend Tribune, South Bend, IN
Palladium-Item, Richmond, IN
The Times, Munster, IN
The Star Press, Muncie, IN

6. Provide citizens and units of general local government with reasonable and timely access to records regarding the past and proposed use of CDBG funds.

7. Make the Consolidated Plan available to the public at the time it is submitted to HUD, and;

8. Follow the process and procedures outlined in items 2 through 7 above with respect to any amendments to a given annual CDBG Consolidated Plan and/or submission of the Consolidated Plan to HUD.

In addition, the State also will solicit comments from citizens and units of general local government on its CDBG Performance Review submitted annually to the U.S. Department of Housing and Urban Developments (HUD). Prior to its submission of the Review to HUD, the State will advertise regionally statewide (pursuant to I.C. 5-3-1) in newspapers of general circulation soliciting comments on the Performance and Evaluation Report.

The State will respond within thirty (30) days to inquiries and complaints received from citizens and, as appropriate, prepare written responses to comments, inquiries or complaints received from such citizens.

Application Process

Overview
The purpose of this application is to provide subsidies in the form of grants for the rehabilitation of owner-occupied housing for low and moderate-income people. Through this program, IHCDA seeks to improve the quality of existing housing stock in Indiana.

This program is designed to give preference in allocating Community Development Block Grant Owner-Occupied Repair (CDBG OOR) funding among selected developments that meet IHCDA's goals:

1. Demonstrate they are meeting the needs of their specific community.
2. Attempt to reach low and very low-income levels of area median income.
3. Are ready to proceed with the activity upon receipt of the award.
4. Revitalize existing neighborhoods, preferably with a comprehensive approach as part of a published community revitalization plan.
5. Propose projects that promote aging in place strategies for seniors, families with seniors, and persons with disabilities.
6. Propose projects that promote healthy family strategies for families with children under the age of 18.
7. Propose projects that are energy-efficient and are of the highest quality attainable within a reasonable cost structure.

In addition, IHCDA encourages the use of Minority Business Enterprise and/or Women-Owned Business Enterprise and Indiana contractors, employees, and products when planning their housing activities.

Funding Round Timelines
Note: This is an anticipated schedule and is subject to change or be extended.

Round 1

Application Webinar	May 2013
Application Due Date	June 28, 2013
Award Announcements	August 22, 2013
Award Workshop	September 2013

Round 2

Application Webinar	January 2014
Application Due Date	March 7, 2014
Award Announcements	April 24, 2014
Award Workshop	May 2014

Application Webinar
An application webinar will be held prior to each application deadline. During the webinar, IHCDA Production Department staff will review the requirements of the CDBG OOR program, threshold and scoring criteria, how to complete the required forms and how to utilize the FTP site. Local Units of Government and Not-for-Profit entities intending to apply are *required* to attend.

Technical Assistance

The applicant may, but is not required, to schedule a technical assistance meeting with the regional IHCDA Real Estate Production Analyst to discuss both the proposed development and IHCDA's application process. Applicants are urged to contact IHDCA early in the planning process to obtain guidance and technical assistance.

Application Submission

The applicant must submit the following items to the Real Estate Department Coordinator:

- Via FTP site:
  - One completed copy of the final application forms
  - All supporting documents required in the tabs
- Via hard copy:
  - One completed copy of the final application forms with original signatures

All required application items are due no later than 5:00 p.m. Indianapolis time on or before the due date. Applications received after the deadline will be returned to the applicant via certified mail. Faxed applications will not be accepted.

Instructions on how to utilize the FTP site will be explained during the Application Webinar. The hard copy of the final application forms should be sent to:

Indiana Housing and Community Development Authority
ATTN: Real Estate Department Coordinator
RE: CDBG OOR Application
30 South Meridian Street, Suite 1000
Indianapolis, IN 46204

All applicants must retain a copy of this application package. Applicants that receive funding will be bound by the information contained herein.

IHCDA will provide the applicant contact with a confirmation number within one (1) week of receipt of the application.

Application Review

Each application must address only one project. Applications are reviewed in a three-step process:

Step One - Completeness	On or before the application deadline, the applicant must provide all required documents, signatures and attachments.
Step Two - Threshold	The application must meet each of the applicable threshold criteria. After initial threshold review, IHDCA staff may contact an applicant to request clarification of information contained in the pending application. The applicant will have the opportunity to respond on or before the due date provided by IHCDA. If the applicant does not respond to the clarification letter and therefore threshold item(s) are still in question, the application will be disqualified. Applications

may have no more than three outstanding clarifications after the second review or the application will be disqualified. Points will be awarded to those applications where no clarifications are required.

Step Three - Scoring: Applications that pass the completeness and threshold reviews are then scored according to IHCDA's published scoring criteria.

Funded applications will be announced at the published IHCDA Board Meeting date. Confirmation letters and score sheets will be uploaded to the FTP site by the close of business on the day of the Board Meeting. Unfunded applications will be notified via a denial letter and score sheets uploaded to the FTP site by the close of business on the day of the Board Meeting.

Compliance Manual

The Compliance Manual outlines the requirements for administering IHCDA's CDBG awards. A complete copy of the Compliance Manual is available on IHCDA's website.

Award Trainings

IHCDA will offer a training to explain the various aspects of the regulatory requirements for award administration. Topics covered will include funds management, required record keeping, and forms and reports that must be submitted to IHCDA. In addition, IHCDA staff will be available to provide one-on-one award trainings upon request. All new applicants and those that have had difficulty administering awards in the past are strongly encouraged to take advantage of these trainings.

Unfunded Applications

Unfunded applications will be notified via a denial letter and score sheets uploaded to the FTP site by the close of business on the day of the Board Meeting. Applications not funded will not be rolled over into the next funding round.

Eligible Applicants

CDBG OOR Funds
Eligible applicants include cities, towns, or counties that are located within Indiana but outside of CDBG entitlement communities and whose proposed activities are consistent with the State's HUD-approved Consolidated Plan. Not-for-profit 501(c)3 or 501(c)4 organizations, CHDOs, public housing authorities, regional planning commissions, or townships are encouraged to participate in activities as subrecipients of local units of government but must apply through a sponsoring eligible city, town, or county.

The following entitlement communities are not eligible to apply for CDBG funds:

Anderson	East Chicago	Gary	Indianapolis**	LaPorte	New Albany
Bloomington	Elkhart	Goshen	Kokomo	Michigan City	South Bend
Carmel	Evansville	Hamilton County*	Lafayette	Mishawaka	Terre Haute
Columbus	Fort Wayne	Hammond	Lake County	Muncie	West Lafayette

*The Town of Sheridan is excluded when the housing activity is outside of Hamilton County.

**Excluding the Marion County Cities of Beech Grove, Lawrence, Speedway, and Southport. The Town of Cumberland is excluded when the housing activity is outside of Marion County.

CDBG Disaster OOR Funds
Eligible applicants include not-for-profit 501(c)3 or 501(c)4 organizations, cities, towns, or counties that are located in Indiana, whose proposed activities are consistent with the State's HUD-approved Consolidated Plan and are NOT located in the one of the following ineligible CDBG Disaster (CDBG-D) counties:

Blackford	Clinton	Delaware	Howard	Lagrange
Miami	Steuben	Tipton	Warren	Wells

Religious and Faith-Based Organizations
Organizations that are religious or faith-based are eligible to participate in the CDBG programs on the same basis as any other organization. Organizations that are directly funded under the CDBG program may not engage in inherently religious activities, such as worship, religious instruction, or proselytization, as part of the assistance. If an organization conducts such activities, the activities must be offered separately, in time or location, from the assistance funded under this part, and participation must be voluntary for the beneficiaries of the assistance provided.

A religious organization that participates in the CDBG program will retain its independence from Federal, State, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that it does not use direct CDBG funds to support any inherently religious activities, such as worship, religious instruction, or proselytization. Among other things, faith-based organizations may use space in their facilities, without removing religious art, icons, scriptures, or other religious symbols. In addition, a CDBG-funded religious organization retains its authority over its internal governance, and it may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents. An organization that participates in the CDBG program shall not, in providing program assistance, discriminate against a program beneficiary or prospective program beneficiary on the basis of religion or religious belief.

Community Development Block Grant (CDBG)	Cities, Town, and Counties (Non-CDBG Entitlement Community	Community Housing Development Organization (CHDO)	501(c)3 and 501(c)4 Not-for-Profit Organizations	Joint Venture Partnerships	For Profit Entities organized under the State of Indiana
Migrant/Seasonal Farm Worker Housing Rehabilitation/New Construction	X				
Owner-Occupied Rehabilitation	X				
Community Development Block Grant Disaster (CDBG-D)					
Owner-Occupied Rehabilitation	X		x		

IHCDA reserves the right to disqualify from funding any application where the applicant, subrecipient, administrator, preparer or any of their related parties has a history of disregarding the policies, procedures, or staff directives associated with administering any IHCDA program or programs of other State, Federal, or affordable housing entities, such as, but not limited to the Indiana Office of Rural Affairs, U.S. Department of Housing and Urban Development (HUD), U.S. Department of Agriculture - Rural Development, or Federal Home Loan Bank.

Eligible Activities & Program Requirements

Eligible Activities

This program is intended to have a long-term impact on the availability and quality of the affordable housing stock in Indiana.

- Rehabilitation of owner-occupied housing.
  - Eligible homeowner beneficiaries include any single-family owner-occupied property.
    - The value of the property cannot exceed the 203(b) Mortgage Limits.
    - The property cannot be located in an 100-year flood plain.
  - Eligible repairs include:
    - Minor repairs which can include inoperable or faulty furnace, leaking roof, unsafe electrical wiring and plumbing, hazardous structural conditions, etc.
    - Any major household system repaired or replaced as part of the rehabilitation process must meet the stricter of the Indiana State Building Code or local building codes.
    - Funds may be used to remedy conditions that, while not posing an immediate threat to health and safety, represent an ongoing threat to the structural integrity of a building and may eventually result in an emergency situation.
- Rehabilitation of owner-occupied manufactured homes. Manufactured homes are eligible if they meet IHCDA's Manufactured Housing Policy or if rehabilitation will bring the unit up to these standards:
  - A single dwelling unit designed and built in a factory, installed as a permanent residence, which bears a seal certifying that it was built in compliance with the Federal Manufactured Housing Construction and Safety Standards law and which also complies with the following specifications:
    - Shall have been constructed after January 1, 1981, and must exceed nine hundred fifty (950) square feet of occupied space per I.C. 36-7-4-1106 (d);
    - Is attached to a permanent foundation of masonry construction and has a permanent perimeter enclosure constructed in accordance with the One and Two Family Dwelling Code;
    - Has wheels, axles and towing chassis removed;
    - Has a pitched roof;
    - Consists of two (2) or more sections which, when joined, have a minimum dimension of 20' X 47.5' enclosing occupied space; and
    - Is located on land held by the beneficiary in fee-simple title, recorded land sale contract, or 99-year leasehold and is the principal residence of the beneficiary.
    - All other manufactured or mobile homes that do not meet the aforementioned criteria are ineligible to receive rehabilitation assistance funded by IHCDA.

Ineligible Activities

Eligible housing activities **do not** include:

- Creation of secondary housing attached to a primary unit;
- Acquisition, rehabilitation, or construction of nursing homes, convalescent homes, hospitals, residential treatment facilities, correctional facilities, or student dormitories;
- The provision of project-based tenant rental assistance;
- Rehabilitation of mobile homes;

- Acquisition, rehabilitation, or new construction located within the boundaries of a one hundred (100)-year floodplain;
- Rehabilitation of multi-family or single-family rental housing.

IHCDA **does not** fund:

- Requests from individuals, political, social, or fraternal organizations;
- Endowments, special events, arts, or international projects;
- Scholarships requested by individuals;
- Institutions that discriminate on the basis of race, color, national origin, sex, religion, familial status, disability, sexual orientation, or gender identity in policy or in practice;
- Projects in furtherance of sectarian religious activities, impermissible lobbying, legislative or political activities;
- Medical research or medical profit-making enterprises.

OOR Program Requirements

The proposed CDBG OOR project must follow these minimum requirements to be eligible for funding. For further details on each requirement, please see IHCDA's Compliance Manual. The link and the appropriate chapter are included.

- Recipients must comply with all regulatory requirements listed in 24 CFR Part 570.
- The homeowner beneficiary must be income eligible. Each household must have an annual income equal to or less than 80% of the area median family income for the target area. The Section 8 definition of household income applies. (IHCDA Compliance Manual, Income Verification Chapter)
- Income verification is valid for a period of six months. If more than six months pass between income verification and contract execution/purchase agreement, a new income verification will be completed. (IHCDA Compliance Manual, Income Verification Chapter)
- The homeowner beneficiary must own the property and must occupy the property as a principal residence. (IHCDA Compliance Manual, Policy Requirements)
    - If there is a long-term lease agreement on the property, a 99-year lease must be recorded in the county recorder's office of the county in which the property is located prior to award document preparation.
    - Ownership does not include life estates and land contracts/contracts for deeds.
- All IHCDA-assisted units must be inspected twice during the award period. The first inspection will occur at the completion of the documented scope of work and prior to the IHCDA Inspector's final physical inspection. The second inspection will be conducted upon completion of the construction for the award. The IHCDA Inspector will conduct the physical inspections. (IHCDA Compliance Manual, Construction Standards & Physical Inspections Chapter)
- Provide a minimum of two (2) public hearings, each at a different stage of the process, for the purpose of obtaining citizens' input and responding to proposals and questions. (IHCDA Compliance Manual, Policy Requirements)
- The match/leverage requirement for both the CDBG and CDBG-D programs is ten percent (10%) of the total amount of CDBG or CDBG-D funds drawn minus administration costs. (IHCDA Compliance Manual, Policy Requirements)
- All applicants are required to complete the environmental review record (ERR) and submit it with application submission as an application Threshold item. The resulting IHCDA Release of Funds is required before fully executed award documents are released and before proceeding

with the project. (IHCDA Compliance Manual, Environmental Review Chapter). For more information, contact Adrienne Schmetzer, IHCDA Design and Construction Review Manager.

- Award recipients will be required to provide proof of adequate builder's risk insurance, property insurance, and/or contractor liability insurance during construction and property insurance following construction for the assisted property throughout the affordability period of the award. Additionally, owner-occupied rehabilitation must also stipulate that adequate property insurance be maintained throughout the affordability period. (IHCDA Compliance Manual, Procurement Procedures Chapter)
- Recipients of a CDBG award must follow competitive procurement procedures for all costs intended to be reimbursed by the award. (IHCDA Compliance Manual, Procurement Procedures Chapter)
- Each recipient of a CDBG award is subject to the HUD requirements of addressing lead-based paint hazards pursuant to 24 CFR Part 35. If a risk assessment is required, then all lead-based paint issues must be addressed. (IHCDA Compliance Manual, Lead Based Paint Chapter)
- Each recipient of a CDBG award is subject to the requirements of the Uniform Relocation Act. See the IHCDA's Compliance Manual chapter on URA for guidance on the regulatory requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended, the Federal regulations at 49 CFR Part 24, and the requirements of Section 104(d) of Title I of the Housing and Community Development Act of 1974, as amended.
- Every recipient must demonstrate that it will complete an action to affirmatively further fair housing during the time frame of an award. (IHCDA Compliance Manual, Fair Housing and Civil Rights Chapter)
- All CDBG and CDBG-D subsidies must be secured throughout the affordability period by a recorded lien and restrictive covenant agreement created by IHCDA. The affordability period begins after project completion. During the affordability period the home must remain the owner's principal place of residency; and the homeowner is required to maintain adequate homeowner insurance on the property. (IHCDA Compliance Manual, Lien and Restrictive Covenants & Affordability Requirements Chapter)

Amount of CDBG or CDBG-D subsidy per unit:	Affordability Period
Under $5,000	1 year
$5,000 - $10,000	2 years
Over $10,000.01	3 years

- If the homeowner sells the property another a low-income family that will use the property as its principal residence throughout the remainder of the affordability period, the homeowner will not be required to repay the funds. The term "low income family" shall mean a family whose gross annual income does not exceed eighty percent (80%) of the median family income for the geographic area published annually by HUD. The purchasing family should pay no more than twenty-nine percent (29%) of its gross family income towards the principal, interest, taxes, and insurance for the property on a monthly basis. The homeowner selling the property will be allowed to receive a fair return on investment, which will include the homeowner's investment and any capital improvements made to the property. The award recipient must execute a lien and restrictive covenant prepared by IHCDA. The award recipient is ultimately responsible for repaying IHCDA any CDBG or CDBG-D funds invested into any unit that does not meet the affordability requirements throughout the Affordability Period. The Affordability Period is based upon the total amount of CDBG or CDBG-D funds invested into the unit.

Subsidy Limitations & Eligible Activity Costs

Subsidy & Budget Limitations
The maximum request amount per application is $350,000.

CDBG and CDBG-D funds for rehabilitation, relocation, and program delivery combined may not exceed $25,000 per unit.

Combined CDBG and CDBG-D funds budgeted for program delivery, award administration, and environmental review cannot exceed twenty percent (20%) of the CDBG award.

Eligible Activity Costs
The bolded items listed below are included in the application budget. If you have a question about which line item an expense goes under, contact your IHCDA Real Estate Production Analyst.

RETAINAGE POLICY - IHCDA will hold the final $5,000.00 of an award until the completion reports, leverage documentation, and closeout documentation is received and approved. Additionally, IHCDA will hold the final $5,000.00 of an award until the final monitoring has been completed and all findings and/or concerns have been resolved.

REHABILITATION – Eligible costs include:

- Hard costs associated with rehabilitation activities for owner-occupied repairs. Examples of eligible repairs are an inoperable or faulty furnace, leaking roof, unsafe electrical wiring and plumbing, hazardous structural conditions, etc.
- Lead-based paint interim controls and abatement costs.
- Mold remediation.
- Utility connections and related infrastructure costs - off-site connections from the property line to the adjacent street are eligible when it is deemed a threat to health and safety. Improvements to infrastructure when there will be no rehabilitation work done on the actual house to be served.

DEMOLITION – Costs associated with the demolition and clearance of existing structures.

PROGRAM DELIVERY - Program delivery costs are those costs that can be directly tracked by address. They include soft costs and client-related costs that are reasonable and necessary for the implementation and completion of the proposed activity. This line item along with administration and environmental review cannot exceed twenty percent (20%) of the CDBG request. Recipients are allowed to draw down this line item as costs are incurred. Additionally, program delivery may be used to payoff a HOME CHDO Predevelopment or CHDO Seed Money loan but may not exceed the twenty percent (20%) line item cap.

Eligible costs include:

- Engineering/Architectural Plans
- Credit reports
- Client in-take / Income verification
- Plans, specifications, work write-ups
- Credit reports
- Title Searches
- Impact fees
- Inspections
- Cost estimates
- Building permits

- Recording fees
- Demolition permits
- Travel to and from the site
- Legal and accounting fees

RELOCATION - This includes relocation payments and other relocation assistance for permanently and/or temporarily relocated individuals, families, businesses, nonprofit organizations, and farm operations where assistance is required and appropriate. Relocation payments include replacement housing payments, payments for moving expenses, and payments for reasonable out-of-pocket expenses for temporary relocation purposes. For additional information on relocation and displacement, please refer to the information provided in the IHCDA's Compliance Manual.

LEAD HAZARD TESTING – Costs associated with lead hazard testing includes Risk Assessment, Clearance Test, etc. The limits for this line item are $1000.00 per unit.

ADMINISTRATION - The administration line item includes those costs directly related to administering the IHCDA award and complying with the regulations associated with these funds. This line item along with program delivery and environmental review cannot exceed twenty percent (20%) of the CDBG request and generally is between $5,000 and $10,000. Recipients are allowed to draw down this line item as costs are incurred. Costs associated with preparing an application for funding through IHCDA are <u>not eligible</u> for reimbursement through a CDBG award.

Eligible costs include:

- Postage
- Office materials and supplies
- Photocopying
- Office rent and utilities
- Travel related to the housing activitiy
- Communication costs
- Lead based paint training
- Staff time or professional services related to reporting, compliance, monitoring, or financial management
- Training related to the housing activity

ENVIRONMENTAL REVIEW – This line item includes expenses associated with the Environmental Review Release of Funds process. This does not refer to a Phase I Environmental Assessment. Those expenses should be included in the Program Delivery line item. This line item along with program delivery and administration cannot exceed twenty percent (20%) of the CDBG request. Eligible costs for this line item are generally between $2,000 and $5,000 and include professional services, publication costs, photocopying, and postage. For further information regarding this activity, please read the Environmental Review Guide found in Chapter 11 of the IHCDA Compliance Manual or contact Adrienne Schmetzer, IHCDA Design and Construction Review Manager.

<u>Ineligible Activity Costs</u>

- Commercial development costs **-** All costs associated with the construction or rehabilitation of space within a development that will be used for non-residential purposes such as offices or other commercial uses. This does not include the common area used by tenants of rental property or the leasing office of the apartment manager. CDBG awards cannot be used to underwrite any portion of commercial development costs. The expenses incurred and income to be generated from commercial space must be reported in a separate "Annual Expense Information" sheet and fifteen (15)-year proforma.

- Replacement Reserves – Funds used to initially capitalize a reserve fund used for major capital repairs to a permanent supportive or rental housing facility. These funds cannot be applied to a CDBG award. These funds can be capitalized either through operating cash flow or through the development budget on the Uses of Funds exhibit.
- Operating Reserves – Funds used to initially capitalize a reserve fund that covers operating expenses when there are rental income shortfalls over the life of a permanent supportive or rental development. This line item must be included on the Uses of Funds exhibit. These funds cannot be applied to a CDBG award.
- Developer's Fee – CDBG funds cannot be used to pay developer's fees.
- Costs associated with preparing an application for funding through IHCDA.
- Purchase or installation of luxury items, such as swimming pools or hot tubs.
- Purchase or installation of equipment, furnishings, tools, or other personal property that is not an integral structural feature, such as window air conditioner units or washers and dryers.
- Purchase or installation of stoves, refrigerators, built-in dishwashers, garbage disposals, and permanently installed individual unit air conditioners.
- Providing tenant based rental assistance.
- Mortgage default/delinquency correction or avoidance.
- Loan guarantees.
- Annual contributions for operation of public housing.
- Costs associated with any financial audit of the recipient.

Completeness & Threshold Criteria

Each proposed project must satisfy the Federal requirements of the CDBG program and any additional requirements established by IHCDA. To be considered for funding, an applicant must meet all of the criteria listed below.

Completeness

- Timeliness – All documentation must be turned in by the application due date.
    - On or before the application deadline, the applicant must provide all documentation as instructed in this Application Process Handbook as well as required documentation listed in the CDBG Application Form.
    - If IHCDA requests additional information from the applicant, all requests are due on or before the date provided by IHCDA staff.
    - Any forms that are late will be denied review and will be sent back to the applicant.
- Responsiveness – All questions must be answered and all supporting documentation must be provided.
    - The applicant must provide all documentation as instructed in this Application Process Handbook as well as required documentation listed in the CDBG Application Forms.
    - The applicant must provide all documentation as requested (i.e. uploaded or hard copies, labeled correctly, etc.)
    - Required signatures must be originally signed.

Completeness Checklist	Y *or* N
Is every question answered?	
Are all required signature pages signed?	
Was the Application Form uploaded to the FTP site by the due date?	
Are all required Tab Attachments uploaded to the FTP site by the due date?	
Was a hard copy of the Application Form with original signatures sent to IHCDA by the due date?	

Threshold Guidance & Checklist

Items that MUST be submitted as part of Threshold Review are indicated in italics. After initial threshold review, IHCDA staff may contact the applicant for further clarification of an item. Failure to respond to the requested clarification items by the due date and in the manner requested will result in application denial.

TAB	DESCRIPTION	INCLUDED AS ATTACHMENT? Y *or* N *or* NA
Application Cover Page		
A	The Applicant must maintain System for Award Management ("SAM"), formerly Central Contractor Registration ("CCR"). www.sam.gov *Provide proof of SAM registration and/or status.*	
Application Summary		
B	If the proposed project previously received funding directly from HUD or Rural Development, the applicant must send a notification letter to the appropriate HUD or Rural Development office. *Provide copy of the letter along with proof of sending.*	
C	If applicant is a Not-for-Profit organization, a letter of notification of the proposed project should be sent to the highest elected official in the project area's Local Unit of Government. *Provide a copy of the letter along with proof of sending.*	
D	Not-for-Profit applicants, subrecipients, and administrators organized under the State of Indiana must provide proof of organization and that they are in good standing. *Submit a copy of the Certificate of existence from the Indiana Secretary of State that is no more than six months old.*	
E	Map - The project area is the geographic area in which a potential housing project may take place. Depending on how urban or rural the surroundings, it might be as small as a neighborhood or as large as a county. *Submit a scaled map that includes the project area boundaries and the specific OOR sites with a map key labeling the site addresses. If the project is in multiple counties, please submit a labeled county map for each county that includes the specific OOR sites with a map key labeling the site addresses. Attach in Tab E.*	
F	Environmental Review Record – Please refer to the Environmental Review Guide for specific details on completing the ERR. *Submit the completed ERR forms, the original publisher's affidavit, flood determinations, site specific photographs and a OOR Priority Checklist (if available) for each identified home.*	

	Maximum Income Levels Applicants may find the IHCDA 2013 Federal Program Income Limits as RED Notice RED-13-09 or here.	
Project Narrative		
	It is important that the project is well planned and that the proposed project will satisfy a housing need in your area – i.e. the need for owner-occupied rehabilitation for a specific population. Address the following items when describing the project. You can also find these items on the application form by floating your cursor over the narrative questions.	
	1) Project Description: Describe the project concept, including the rationale for selecting the current project form, and details of the project including size, number of units, location, etc.	
	2) Amenities in and around the project: Describe the amenities that the project will provide to beneficiaries along with amenities within close proximity to the project area that beneficiaries will benefit from.	
	3) Area's needs the project will meet: Describe the community need for the project along with the impact the project will have on the community as a whole.	
	4) Community support and/or opposition to the project: Describe the support and/or opposition the community has for the project. List community leadership (individuals, agencies, elected officials, organizations, etc.) that support and/or oppose the project. Also describe any public outreach that has taken place to ensure/gain community support for the project.	
	5) Constituency served by the project: Describe the project's intended customers or beneficiaries and discuss the project's impact on those individuals or families. Please explain why the proposed project is the best possible solution for the beneficiaries.	
	6) Partnerships created to enhance the project: Identify the partnerships, formal and informal, that were created as a result of the project concept and the role the partnerships have in the project?	
	7) Project quality: Describe the elements of the project (can include services provided, materials used, organizational/financial support, etc.) that will help produce a high quality project for both the beneficiaries and the community.	
G	8) Target area: Describe the project location and why this area was selected. The target area is the geographic location in which a potential housing project may take place. Depending on how urban or rural the surroundings, it might be as small as a neighborhood or as large as a county. Describe how you determined this was the appropriate area for your project. *Attach a scaled map that includes: the project area boundaries and*	

	the specific OOR sites with a map key labeling the site addresses. If the project is in multiple counties, please submit a labeled county map for each county that includes the specific OOR sites with a map key labeling the site addresses. Attach in Tab G.	
	9) Effective use of resources: Describe the steps taken by your organization to ensure resources, both non-IHCDA and IHCDA funds, are being used effectively to positively impact beneficiaries and the community.	
	10) Unique features: **Briefly** describe the unique features of the project. Unique features should be a creative addition to the proposed OOR program. They should enhance the overall character of your project, improve the homeowners' and the community's quality of life, health, and safety. Unique features can be included in the financial structure of the project, involve members of the community, include items specific to the target area/project location or could include special services offered to the population served. More information and supporting documentation will be required later in the application.	
	11) Services: **Briefly** describe any services that will be provided to beneficiaries that address the needs of the project's tenants. More information and supporting documentation will be required later in the application.	
Leverage		
H	Leverage Spreadsheet *Submit a completed Leverage Spreadsheet with all required support documents.*	
H	Commitment Letters *Provide originally signed Letters of Commitment for any match/leverage or other sources contributing to the project.*	
Sources and Uses		
I	List all sources of grants to the project that do not require repayment. Also, list the IHCDA award request amount made in this application.	
I	*Attach letters of commitment from all other funders in Tab I.*	
I	List all sources of private or public cash donations to the project. *Attach letters of commitment in Tab I.*	
I	List all in-kind contributions to the development phase of the housing activity, including construction, materials, volunteer labor, waived fees, portion of sale price below appraised value, etc. *Attach letters of commitment, appraisal, or purchase agreement in TAB I.*	
Project Characteristics – See Page X for more details.		

J	Aging in Place: Narrative *Submit a narrative explaining the specific proposed OOR improvements for the AIP project and how these improvements will enhance accessibility, livability and visitability. Attach in Tab J.*	
	Comprehensive Community Development: Narrative *Submit an explanation of how this project is part of a larger revitalization effort should be explained in the Narrative and Need section of the application.*	

J	Comprehensive Community Development OOR Projects: Evidence of a Plan
	
	Submit ALL OF THE BELOW in Tab J as evidence that this project is part of a comprehensive revitalization or development plan:
	▪ *Copy of the entire plan;*
	▪ *A short narrative about the efforts that lead to the creation of the plan and how the need for owner-occupied rehabilitation was identified as an area need to be included in the plan;*
	▪ *A bulleted list that includes page numbers of where to find:*
	    ○ *References to the need for affordable owner-occupied rehabilitation in the project target area*
	    ○ *An evaluation of current area conditions*
	    ○ *Public participation*	

J	Comprehensive Community Development OOR projects: Target Area *Submit a scaled map that includes the project area boundaries and the specific OOR sites with a map key labeling the site addresses. Clearly label the boundaries and indicate the size of the target area. Attach in Tab J.*	
J	Comprehensive Community Development OOR projects: Evidence of Adoption *Submit a copy of the resolution by the Local Unit of Government adopting the plan in Tab J.*	
J	Comprehensive Community Development OOR projects: Local Support *Submit a letter from the highest elected local official certifying that the OOR project will assist in the revitalization of the specific neighborhood or area. Attach in Tab J.*	
J	Services: ▪ *Form A: Homeowner Investment Plan Matrix listing all services for the entire proposed OOR program (found at the end of this Application Package);* ▪ *Form B: Homeowner Investment Plan Matrix for EACH service provider with original signatures (found at the end of this Application Package);* ▪ *A brief narrative explaining how these services will enhance the targeted population for the proposed OOR project.*	

Readiness		
K	Client Intake Applicant, sub-recipient, or administrator has already begun client intake. Client intake must include income verification. Beneficiaries that have not been appropriately income-verified per the HUD Part 5 definition should not be included in the list. List needs to include client name and information pertinent to the target population being served. *Submit a copy of the Client Intake list in Tab K.*	
K	Contract Bidding *Provide a copy of the advertised bid notice in Tab K.*	
K	Public Hearing Two public hearings are required. One public hearing should occur prior to application. *Provide the ALL of the following in Tab K:* • *Original tear sheet or original publisher's affidavit of legal notice that includes the date of the public hearing and the date of notice publication. Under Indiana Code (I.C. 5-3-1-2 (B)) there must be a minimum of one legal notice at least ten (10) calendar days prior to the public hearing.* • *Describe methods used to solicit participation of low and moderate-income persons.* • *A copy of the sign-in sheet.* • *A copy of the minutes of the public hearing, which must include the date and time of the meeting, the name and title of the person running the meeting and anyone who presented at the meeting, and all content posed to the public.* • *Describe any comments/complaints received and responses to the comments/complaints.*	
Capacity		
L	Training Points will be awarded for a member of the applicant, sub-recipient or administrator staff who has participated in a housing or community development related training in the past 24 months. *Attach copies of the training completion certificate(s) in Tab L.*	
L	Certification Points will be awarded for a member of the applicant, sub-recipient or administrator staff who has completed the following certifications within the past three years.	

	Attach copies of the certification completion documentation in Tab L.	
Financing		
M	Public Participation Points will be awarded to applicants whose proposed project has received a firm commitment of other public funds. *Submit a letter from the appropriate authorized official approving the funds. The letter must include (a) a description of the type of approved funding for the proposed project and (b) the amount of funding.*	
M	Leveraging of Other Funding Sources Points will be awarded to applicants whose proposed project has received a firm commitment of Other Leveraged Funding Sources. *Submit a letter from the appropriate authorized official approving the funds. The letter must include (a) a description of the type of approved funding for the proposed project and (b) the amount of funding.*	
Unique Features & Completeness Bonus		
N	Unique Features Points will be awarded to projects proposing Unique Features. Features receiving points in other sections of this application will not be considered for Unique Feature points. *Submit a narrative summary in of the proposed unique features.*	

Scoring

If an application meets all applicable requirements, it will be evaluated and scored based on:

Scoring Category	Points Possible
Project Characteristics	50
Readiness	15
Capacity	20
Financing	10
Unique Features	5
Completeness Bonus	5
Total Possible Points	**105**

No award shall be made to any applications that score below 80 points. When there is a scoring criteria based on the county being served and there are multiple counties, the applicant should add up the scores from each county and average them, rounding to the nearest whole number.

Project Characteristics **Category Maximum Points Possible: 50**

This scoring category describes the proposed OOR project. There are 50 total possible points for this scoring category. The points can be achieved through the following sub-categories: Constituency Served, Targeted Population, Comprehensive Community Development, and Services.

1) *Constituency Served* *Maximum Number of Points: 8*

   If the development commits to servings beneficiaries in IHCDA-assisted units with maximum incomes lower than required by the CDBG program and maintains housing costs at affordable rates, points will be awarded in accordance with the following chart. Percentages are of the area median income (AMI) for the county in which the development is to be located. Awarded recipients will be held to the unit commitment in their award agreement. Changes to the AMI levels will require prior IHCDA approval.

Constituency Served	Points
40% of Population served at or below 30% AMI	8

2) *Targeted Populations* *Maximum Number of Points: 20*

   Points will be awarded to applicants that target populations with special housing needs in accordance with the following charts. A project may address up to two types of populations in one OOR project and therefore may receive points from more than one chart. Details of the target populations can be found within this section. Specific definitions can be found in the Glossary.

Target Population: Aging in Place	Points
100% of Population served 55 and Older and/or Disabled	20
0% - 50% of Population served 55 and Older and/or Disabled	10

Aging in Place (AIP) refers to making our living environment safe and adaptable so that everyone can remain independent and continue to thrive in their homes and community even as circumstances change. Therefore AIP not only refers to elderly persons but also to persons with physical and mental disabilities.

In order to receive points for AIP OOR projects must satisfy the following criteria:

- Households will qualify for the AIP target population if there is at least one elderly person living in the home or if there is at least one physically or mentally disabled person living in the home.
- The modifications made to the home with IHCDA OOR funding must be for accessibility, livability, and vistability.
    - Submit a narrative explaining the specific proposed OOR improvements for the AIP project and how these improvements will enhance accessibility, livability and visitability. Attach in Tab J.

Target Population: Families with Children	Points
100% of Population served is families with Children	15
0% - 50% of Population served is families with Children	10

Target Population: Other	Points
100% of Population served does not fall under the above categories.	10
0% - 50% of Population served does not fall under the above categories.	5

3) *Comprehensive Community Development* *Maximum Number of Points: 10*
Points will be awarded to applicants whose projects contribute to the revitalization of existing areas. Points will be awarded based on the chart below.

Comprehensive Community Development	Points
An explanation of how this project is part of a larger revitalization effort.	1
Evidence that this project is part of a comprehensive revitalization or development plan.	5
The OOR project is located in a targeted area.	1
Adoption of the plan by a Local Unit of Government.	2
A letter from the highest elected local official certifying that the OOR project will assist in the revitalization of the specific neighborhood or area.	1

OOR projects with a Comprehensive Community Development focus are a part of a broader, more comprehensive approach to area improvement. These projects have the capability of contributing to fundamental change to the character of a targeted area. Further explanation of the points categories are explained:

In order to receive points under the Comprehensive Community Development scoring sub-category, the applicant must submit the following:

- An explanation of how this project is part of a larger revitalization effort should be explained in the Narrative and Need section of the application. You should include information regarding target size, a plan, the efforts already completed or underway, local support for this and other projects in the revitalization efforts, funding commitments, what is the intended impact and how impact will be measured, etc.
- Evidence that this project is part of a comprehensive revitalization or development plan. Ideally this will be a comprehensive or revitalization plan for the town/city where the project is located. The plan must be no older than five years and should include: (a) a target area, (b) detailed policy goals, which must include the rehabilitation of owner-occupied homes, (c) implementation measures along with specific, current, and ongoing time frames for the achievement of such policies and housing activities, (d) an evaluation of current area conditions.
    - Submit the following in Tab J:
        - Copy of the entire plan;
        - A short narrative about the efforts that lead to the creation of the plan and how the need for owner-occupied rehabilitation was identified as an area need to be included in the plan;
        - A bulleted list that includes page numbers of where to find:
            - References to the need for affordable owner-occupied rehabilitation in the project target area
            - An evaluation of current area conditions
            - Public participation

  The following will not be considered for points as eligible plans for this category: short-term work plans, consolidated plans, municipal zoning plans, or land use plans, plans that are older than five years old and plans that do not reflect the current target area conditions.
- Target Area - Submit a scaled map that includes the project area boundaries and the specific OOR sites with a map key labeling the site addresses. Clearly label the boundaries and indicate the size of the target area. Attach in Tab J.
- Evidence of Adoption - Submit a copy of the resolution by the Local Unit of government adopting the plan. Attach in Tab J.
- Local Support – Submit a letter from the highest elected local official certifying that the OOR project will assist in the revitalization of the specific neighborhood or area. Attach in Tab J.
- Partnerships - These funding commitments or major investments should not be received solely from the development of other IHCDA funded projects. Generally, the overall development plan should include municipal support, private investment and/or private sector commitments to the redevelopment area.

4) *Services* *Maximum Number of Points: 12*

Points will be awarded to applicants whose projects contribute to the overall quality of life for the beneficiaries of the proposed OOR project. Points will be awarded based on the chart below.

Level of Services	Points Possible
Level 1 Services: Up to three services at one point each.	3
Level 2 Services: Up to three services at two points each.	6
Level 3 Services: Up to three services at four points each.	12

In order to receive points for this scoring category, the applicant must submit:

- Form A: Homeowner Investment Plan Matrix listing all services for the entire proposed OOR program (found at the end of this Application Package);
- Form B: Homeowner Investment Plan Matrix for EACH service provider with original signatures (found at the end of this Application Package);
- A brief narrative explaining how these services will enhance the targeted population for the proposed OOR project.

Readiness **Category Maximum Points Possible: 15**

This category describes the applicant's ability to begin and timely execute an awarded project.

1) *Client Intake* *Maximum Number of Points: 10*

Points will be awarded to applicants that have already begun the client intake process, according to the chart below. If the applicant, sub-recipient, or administrator has already begun client intake, submit a copy of the client intake list in Tab K.

% of Assisted Units	Points
25 - 50% of the units	6
51 - 75% of the units	8
76 - 100% of the units	10

2) *Contract Bidding* *Maximum Number of Points: 2*

Points will be awarded to applicants that have advertised a notice for bids for prospective contractors to assist all units that will be served by the program. Provide a copy of the bid notice in Tab K.

3) *Public Hearing* *Maximum Number of Points: 3*

Points will be awarded to an applicant who has held a public hearing. In order to receive points, the applicant must demonstrate that a public hearing was held with a minimum attendance of 10 people from the public. The applicant, sub-recipient, and administrator staff or board members will not be counted to meet the minimum attendance requirements.

In order to receive points in this category the applicant must provide in Tab K:

- Original tear sheet or original publisher's affidavit of legal notice that includes the date of the public hearing and the date of notice publication. Under Indiana Code (I.C. 5-3-1-2 (B)) there must be a minimum of one legal notice at least ten (10) calendar days prior to the public hearing.
- Describe methods used to solicit participation of low and moderate-income persons.
- A copy of the sign-in sheet.

- A copy of the minutes of the public hearing, which must include the date and time of the meeting, the name and title of the person running the meeting and anyone who presented at the meeting, and all content posed to the public.
- Describe any comments/complaints received and responses to the comments/complaints.

Capacity **Category Maximum Points Possible: 25**

This category evaluates the applicant's ability to successfully carry out the proposed OOR project based on trainings, certifications and/or experience in housing or community development.

1) *Training* *Maximum Number of Points: 5*
Points will be awarded for a member of the applicant, sub-recipient or administrator staff who has completed a housing or community development related training in the past 24 months. Two points will be awarded for the first training and one point per additional training, up to five points possible. Attach copies of the training completion certificate in Tab L.

Training	Points
Housing or community development related training	2 for the first training, 1 point for each additional training up to 5 points

2) *Certification* *Maximum Number of Points: 10*
Points will be awarded for a member of the applicant, sub-recipient or administrator staff who has completed the following certifications within the past three years. Five points awarded for the Certified Aging-in-Place Specialist certification. Two and a half points will be awarded for all other certifications, up to ten points. Attach copies of the certification completion in Tab L.

Certification	Points
Certification from one of the certifications listed below	5 points for the Certified Aging-in-Place Specialist certification, 2.5 points for all other certifications, up to 10 points

Certification	Sponsoring Organization
Project Development Training	Indiana Association for Community and Economic Development (IACED)
Housing Development Finance Professional	National Development Council (NDC)
Community and Neighborhood Revitalization Certificate	NeighborWorks America
Bank of America Neighborhood Builder® Leadership Program	The Center for Leadership Innovation
Certified Aging-in-Place Specialist	National Association of Home Builders (NAHB)
CDBG Grant Administration Certification	Office of Community and Rural Affairs, State of Indiana

3) *Experience* *Maximum Number of Points: 5*
Points will be awarded for a member of the applicant, sub-recipient or administrator staff with successful experience in administering an IHCDA OOR award in the past five years. In order to qualify for points, there cannot have been findings upon monitoring and the awards must be closed out. Please list the award numbers in the application forms.

Experience	Points
Applicant, sub-recipient or administrator staff member with experience administering at least two IHCDA OOR awards in the past five years with no findings upon monitoring.	2 for the first staff member, 1 point for each additional staff member, up to 5 points

4) *Previous Awards* *Maximum Number of Points: 5*
Points will be awarded to an applicant where the applicant, sub-recipient, AND administrator have not had any monitoring findings and who have expended award funds in a timely manner for all IHCDA awards in the past five years. Timely expenditure of funds includes lack of award extensions.

Financing **Category Maximum Points Possible: 10**

1) Public Participation *Maximum Number of Points: 5*
Points will be awarded to applicants whose proposed project has received a firm commitment of other public funds. A "firm commitment" means that the funding does not require any further approvals. "Public funds" include federal, state, or local government funds. This can include funds awarded from other federal or state agencies, the Federal Home Loan Bank**,** or waivers resulting in quantifiable cost savings that are not required by federal or state law.

Points will be awarded based on the Amount of Public Participation Funding/Total Project Costs:

% of Total Development Cost	Point(s)
.50% to .99%	1
1.00% to 1.99%	2
2.00% to 2.99%	3
3.00% to 3.99%	3.5
4.00% to 4.99%	4
Greater than 5.00%	5

In order to qualify for points in this category the applicant must submit in Tab M a letter from the appropriate authorized official approving the funds. The letter must include (a) a description of the type of approved funding for the proposed project and (b) the amount of funding.

2) *Leveraging of Other Sources* *Maximum Number of Points: 5*
Points will be awarded to applicants whose proposed project has received a firm commitment to leverage other funding sources. A "firm commitment" means that the funding does not require

any further approvals. "Other funding sources" include (but are not limited to) private funding, funds from a local community foundation, donations, etc.

Points will be awarded based on the amount of Other Funding Sources Leveraged/Total Project Costs:

% of Sources	Point(s)
11 - 15%	2
16 - 20%	4
21 - 30%	6
31 - 40%	8
41% or more	10

In order to qualify for points in this category the applicant must submit in Tab M a letter from the appropriate authorized official approving the funds. The letter must include (a) a description of the type of approved funding for the proposed project and (b) the amount of funding.

Unique Features & Bonus **Category Maximum Points Possible: 10**

1) *Unique Features* *Maximum Number of Points: 5*

Points will be awarded to applicants that offer unique features that contribute to each of the beneficiary units of the proposed OOR project. Unique features should be a creative addition to the proposed OOR program. They should enhance the overall character of the project, improve the homeowners' and the community's quality of life, health, and/or safety. Unique features can be included in the financial structure of the project, involve members of the community, include items specific to the target area/project location or could include special services offered to the population served.

Points are awarded relative to other projects being scored during each application cycle and are awarded in IHCDA's sole and absolute discretion. The following chart sets forth the anticipated percentage of applications that will receive points using a maximum of 5 points.

% of Applications	5%	8%	12%	16%	18%	16%	12%	8%	5%
Points	5	4.5	4	3.5	3	2.5	2	1.5	1

In order to receive points in this category, the applicant must submit in Tab N a narrative summary in of the proposed unique features. Features receiving points in other sections of this application will not be considered for Unique Feature points.

Glossary of Terms

Aging in Place: Making a living environment safe and adaptable so that everyone can remain independent and continue to thrive in their homes and community even as circumstances change.

Area Median Income:

Children: Children are defined as those persons ages 18 years of age or younger. The child must reside in the home that will benefit from the OOR program.

Disabled:

Elderly: A person 55 years of age or older. This target population category also includes families with a person living in their home that is 55 years of age or older and modifications to the home are needed so this person may age in place in the home benefitting from the OOR program with the family.

Form A: Homeowner Investment Plan Matrix

Service Provider/Agent/Organization			
Name:			
Street Address:			
City:		County:	

Place a "X" next to the targeted population			
Persons with physical or development disabilities		Persons with mental impairments	
Households with children		The elderly	
Other		Households with elderly, persons with physical/development disabilities or persons with mental impairments	

LEVEL 1 SERVICES = 1 Point per Service (up to 3 services for points = total 3 points possible)					
Tenant Investment Plan Services & Description					
Service		**Brief Description of Service**	**Location of Service**	**Distance from General Project Area**	**Points**
☐	Food Pantry Referral				
☐	Clothing Pantry Referral				
☐	2-1-1/ Information & Referral				
☐	Smoking Cessation				
☐	Discount Program				
☐	Coupons to Local Public/ Private Facilities				

LEVEL 2 SERVICES = 2 Points per Service (up to 3 services for points = total 6 points possible)					
Tenant Investment Plan Services & Description					
Service		**Brief Description of Service**	**Location of Service**	**Distance from General Project Area**	**Points**
☐	Computer Training				
☐	Nutrition Classes/ Food Preparation				
☐	Exercise Classes				
☐	Resume Building				
☐	GED/ Adult Education				
☐	Tax Preparation Assistance				
☐	Blood Pressure Screening				
☐	Medicaid Waivers				
☐	Stress Management				

☐	Symptom Management				

LEVEL 3 SERVICES = 3 Points per Service (up to 4 services for points = 12 points possible)					
Tenant Investment Plan Services & Description					
Service		**Brief Description of Service**	**Location of Service**	**Distance from General Project Area**	**Points**
☐	Transportation				
☐	Parenting Classes/ Early Childhood Development				
☐	Legal Planning				
☐	Emergency Response System				
☐	Financial Literacy				
☐	Housekeeping				
☐	Animal Therapy				
☐	Physical Therapy				
☐	Medication Delivery				
☐	Home Healthcare				
☐	Employment Services/ Vocational Rehab				
☐	Meals on Wheels				
☐	Assisted Living				
☐	Alzheimer's Care				
☐	Adult Daycare/ Eldercare				
☐	Substance Abuse Treatment				
☐	Family Caregiver Support Program				

Form B: Homeowner Investment Plan Service Agreement

HOMEOWNER INVESTMENT SERVICE AGREEMENT

This agreement between (Applicant and Administrator (if applicable))_____, _____, and (Service Provider/Agent/Organization)_____, is to confirm the activities and/or incentives offered to residents of (project name)_____. The Applicant/Administrator agrees that in partnering with the Service Provider/Agent/Organization, the project should offer programs that are tailored to the needs of the targeted homeowners and encourage homeowners to invest in the overall well-being, neighborhood/community, and/or environment.

It is agreed by all signing parties that the Homeowner Investment Plan adds no extra cost to the homeowner. It is understood; that some classes/activities offered might require a maintenance fee. This fee must remain minimal. Homeowner Investment Plan Services may target specific homeowners of the project but must be optional.

The Applicant/Administrator also agree to fill out Form A, and attach the form to this agreement, listing the services that will be offered to the homeowners, a brief description of the service, where the service is being offered, the distance from the general project area, and the level of the service.

This agreement and the services listed on Form A shall remain in effect for the life of the Restrictive Covenant Term. The Applicant/Administrator will be responsible for maintaining all services for the life of the restrictive covenant term (even if the Applicant/Administrator is required to find a different provider who will provide the same or comparable services to benefit the residents)

*Applicant Authorized Signatory*____
*Printed Name*_____ *Date*_____

*Administrator Agent*____
*Printed Name*_____ *Date* _____

*Service Provider/Agent/Organization*____________________________________
*Printed Name*_____ *Date*_____

HOME Program Requirements

Recapture and Resale Requirements, HOME Program

Resale Guidelines

Resale restrictions shall be implemented for every property constructed, redeveloped, or rehabilitated, in whole or in part, with HOME Funds in the form of a development subsidy. A development subsidy consists of the difference between the cost of producing the unit and the fair market value of the property. If HOME Funds are provided to the homebuyer as a grant, the property will be subject to a resale restriction.

If the homebuyer determines that it no longer intends to use the property as its principal residence, resale restrictions require the homebuyer to sell the property to a low-income family that will use the property as its principal residence.

The original homebuyer is entitled to a fair return on its investment (as described below) upon the sale of the property. The fair return will be based on the percentage change in the Consumer Price Index for All Urban Consumers Owners' Equivalent Rent of Primary Residence category in Table I of the CPI Detailed Report (the "CPI Index") during the period of the homebuyer's ownership. Accordingly, the CPI Index during the month the residence was completed (in IDIS) will be compared to the CPI Index during the month the original homebuyer sells the residence to determine the percentage of the return. The homebuyer's investment will include the original homebuyer's investment (i.e., any down payment), plus and any capital improvements. A capital improvement is any property enhancement that increases the overall value of the property, adapts it to new uses, or extends its life such as: adding windows, insulation, a new drive way, a new furnace, a garage, bedroom, new roof, remodeling kitchen, etc. Any capital improvement will be valued based on actual cost as documented by the original homebuyer's receipts. Generally, replacing worn or dated components such as appliances or carpet would not be considered an improvement that adds value or adapts it to new uses.

At the same time, the property must also be sold at a price that is affordable to low income families between fifty percent (50%) and eighty percent (80%) of the median area income for the geographic area published annually by HUD. The purchasing family should pay no more than twenty-nine percent (29%) of its gross family income towards the principal, interest, taxes and insurance for the property on a monthly basis.

In certain circumstances, such as a declining housing market where home values are depreciating, the original homebuyer may not receive a return on his or her investment because the home sold for less or the same price as the original purchase price and a loss on investment may constitute a fair return.

Recapture Guidelines

Recapture provisions shall be implemented for any property purchased, in whole or in part, by a homebuyer that receives a direct subsidy ("homebuyer subsidy") in an amount greater than or equal to One Thousand and 00/100 Dollars ($1,000) in HOME Funds. A homebuyer subsidy consists of any financial assistance that reduces the purchase price from fair market value to an affordable price, or otherwise directly subsidizes the purchase (e.g., down-payment or closing cost assistance, subordinate financing).

If a homebuyer subsidy is provided to the homebuyer as a loan, the HOME Funds will be subject to a recapture provision.

If the homebuyer no longer utilizes the property as its principal residence during the Affordability Period defined below, the amount to be recaptured is the shared net proceeds of a prorated amount of the homebuyer subsidy. The proration shall be based on the length of time the homebuyer has occupied the property as its principal residence in relation to the Affordability Period. Any net proceeds that exist will be shared between IHCDA and the homebuyer. If there are not any proceeds, there is no amount to recapture.

If there is both development subsidy and homebuyer subsidy or just homebuyer subsidy, a recapture provision must be implemented. In cases where a homebuyer subsidy was not provided and there is only a development subsidy, resale restrictions must be executed on the property.

Recapture provisions will also be used for HOME-assisted units purchased by homebuyers through IHCDA's First Home/Plus Program. The amount to be recaptured shall be based on the net proceeds received from the sale of the property. If there are not any proceeds, there is no amount to recapture.

With the decline of real estate prices, it may be impossible for IHCDA to provide a fair return to the original homebuyer <u>and</u> sell at a price affordable to a reasonable range of low-income buyers. IHCDA may provide additional HOME investment to the subsequent buyer as needed.

Affordability Period

The Affordability Period for all HOME-assisted homebuyer units is determined by the amount of assistance that goes into the property, e.g. rehabilitation, demolition, new construction, acquisition, program delivery, developer's fee and the type of restriction placed on the property.

HOME Affordability Periods

Amount of HOME subsidy per unit:	Affordability Period
■ Under $15,000/unit	5 years
■ $15,000 - $40,000	10 years
■ Over $40,000 per unit – or any rehabilitation/refinance combination activity	15 years
■ New Construction or acquisition of newly constructed transitional, permanent supportive or rental housing	20 years

Source:

Indiana Housing and Community Development Authority

Under resale guidelines the Affordability Period is based upon the total amount of HOME funds invested into the unit.

Under recapture guidelines the Affordability Period is based upon the total amount of the homebuyer subsidy that the homebuyer received in HOME funds.

Rental Units. With respect to HOME-assisted rental units either resale restrictions, recapture provisions, or a combination of both can be used in order to preserve affordability.

The Affordability Period for all HOME rental units is determined by calculating the total amount of HOME funds invested into the property, e.g. rehabilitation, demolition, new construction, acquisition, program delivery, developer's fee.

Refinancing Guidelines

When loaning funds to rehabilitate multifamily developments, IHCDA will consider refinancing existing debt if it is necessary to permit or continue affordability under Sec. 92.252 and meets the priorities set forth in the State's Consolidated Plan.

To receive full consideration by IHCDA, the following conditions must be met:

- Rehabilitation must be the primary activity. Therefore, rehabilitation costs must exceed the amount used to refinance existing debt.
- Except for permanent supportive housing developments, properties located within another Participating Jurisdiction must demonstrate equal and comparable financing from the local unit of government.
- The development must satisfy a minimum 15-year affordability period.
- Disinvestment in the property has not occurred.
- The long term needs of the development can be met.
- It is feasible to serve the targeted population over the affordability period.
- Refinancing loans made or insured by any other Federal program, including, but not limited to, FHA, CDBG, or Rural Development is prohibited.

ESG Program Requirements

ESG Program Requirements

This document supplements the eCon Plan suite with required narrative for the Emergency Solutions Grant (ESG) program. Contents include:

- Summary of the consultation process with the State Continuum of Care (CoC);
- Matching funds;
- Written standards for providing ESG assistance;
- Proposed activities for ESG during 2013 program year;
- Written Standards for Provision of ESG Assistance;
- The process for ESG awards;
- Homeless Participation requirement; and
- Required performance standards.

Consultation with Continuum of Care

This section describes how the State of Indiana consulted with the planning committees: Funding & Strategies Committee (F&S Committee) and Steering Committee within the CoC and under the Indiana Planning Council on Homelessness to:

- Determine how to allocate ESG funds for eligible activities;
- Develop the performance standards for activities funded under ESG; and
- Develop funding, policies, and procedures for the operation and administration of the HMIS.

The Indiana Planning Council on the Homeless is the governing body for the Balance of State under the guidance of the Steering Committee. The Indiana Planning Council on the Homeless is an open forum for all Regional Planning Councils across the CoC IN-502 to provide input on issues concerning homelessness and how the CoC should allocate funding. These recommendations are provided to the F&S Committee whereas this committee also shares their recommendations to the Indiana Planning Council on the Homeless. The Steering Committee members are: a previously homeless person, four nonprofit providers who provide temporary or permanent housing services to clients, two entitlement cities in the CoC, the CoC Applicant (IHCDA) and a Supportive Housing Service Provider - Corporation for Supportive Housing.

The State ESG program presented their program plans to the F&S Committee Members in March 2013. The F&S Committee represents homeless providers who provide temporary or permanent housing and/or services to homeless persons, mental health service providers, Regional Planning Council Chairs within the CoC. Dprt of Education, Supportive Housing Service provider, entitlement city and the Chair is the CoC Collaborative Applicant for all McKinney Vento Funding opportunities. The FSC oversees local, state, and federal funding for the CoC and seeks new opportunities for funding to end homelessness, such as Section 811 PRAD, Mckinney Vento

Competitive Applications and the Consolidated Plan Application. The F&S helps to develop funding policy to advance CoC priorities and oversees the integration and use of mainstream resources in the area. The FSC oversees the allocation and helps to set policy for the State ESG in order to integrate CoC and ESG funding under the same performance standards, meeting all the needs and gaps in the CoC area.

The Planning Council has three other committees: Data Collection and Evaluation, Quality and Performance, and Housing and Program Continuum Development. The State ESG program will be part of the work of each committee.

The Data Collection and Evaluation Committee will provide oversight and monitor the use of HMIS to measure performance measures such as length of shelter stays and recidivism as well as tracking housing stability measures for the rapid re-housing program. This committee will also advise the HMIS lead agency during the implementation of the Arizona Matrix as both a vulnerability index to inform case managers developing housing plans with participants and program level performance reports for the Funding and Strategies committee

The Quality and Performance committee is being consulted to develop shelter quality standards using national best practices and a housing first approach to homeless assistance. The shared quality standards will focus on reduction in the length of homelessness, reduction in the return to homelessness and improved engagement and efficacy of all homeless assistance programs.

The Housing and Program Continuum Development committee will work with the state ESG program to develop and coordinate regional central intake and triage centers to insure access to assistance is driven by the needs of persons experiencing homelessness. The Housing and Program Continuum Development committee will also coordinate the State ESG program with the CoC strategic planning around key community service systems: housing, employment, child care, youth services, primary health care, behavior health care, addiction treatment and other mainstream resources.

The State ESG program will further the goals of CoC and further the state's efforts to end homelessness by establishing common performance goals. The guiding philosophies include a Housing First model for homelessness solutions, the need for an effective outreach and triage infrastructure to prevent homelessness and rapidly re-house individuals and families experiencing homelessness, and the proven efficacy of permanent supportive housing and rapid re-housing. The strategic objectives of the Planning Council are to:

- Decrease shelter stays by increasing rapid re-housing to stable housing.
- Reduce recidivism of households experiencing homelessness.
- Decrease the number of Veterans experiencing homelessness.
- Decrease the number of persons experiencing Chronic Homelessness.
- Create new permanent supportive housing beds for chronically homeless persons.
- Increase the percentage of participants remaining in CoC funded permanent housing projects for at least six months to 86percent or more.
- Decrease the number of homeless households with children.
- Increase the number of rental assistance programs and services.

- Increase the percentage of participants in Emergency Solutions Grant funded rental assistance programs that move into permanent housing to 82 percent or more.
- Increase the percentage of participants in all CoC funded transitional housing that move into permanent housing to 70 percent or more.
- Increase the percentage of participants in CoC funded projects that are employed at exit to 38 percent or higher.
- Increase persons experiencing homelessness access to mainstream resources.
- Collaborate with local education agencies to assist in the identification of homeless families and inform them of their eligibility for McKinney-Vento education services.
- Improve homeless outreach and triage to housing and services.
- Improve HMIS data quality and coverage, and use data to develop strategies and policies to end homelessness.
- Develop effective discharge plans and programs for individuals leaving State Operated Facilities at risk of homelessness.

By aligning ESG and CoC funding, the State will be in a position to use ESG funds strategically with Permanent Supportive Housing Programs and other homeless providers, and service agencies throughout the CoC. . In addition, the alignment will allow allocation of ESG funds based upon the need stated in the, Housing Inventory Count, and HMIS data.

Matching Funds

The State ESG program will use match from a variety of federal, state and private sources. The RFP will require successful applicants to identify community resources willing to commit services and cash assistance for security deposits, utility acreages, utility deposits, outreach and other housing stabilization services. IHCDA will work with the local sub recipients to secure match from Township Trustees and Community Action Agencies within the project's catchment area. Township trustee funds will be used for deposits and rental assistance while Community Action Agencies will be encouraged to use CSBG funds in collaboration with the ESG funds. Further match will come in the form of operations expenses for a web-based referral tool used in Indiana as the central assess point for each regional catchment area.

Proposed Activities and Funding Priorities

This section summarized the proposed activities and funding priorities for the 2013 program year.

The funding allocation for 2013 will support the five year goals established in the 2010-2014 Consolidated Plan, including:

- Reduce homelessness and increase stability for special needs populations.
- Expand and preserve affordable housing opportunities throughout the housing continuum.

The rationale for assigning the funding priorities was largely based upon HUD's national focus and priority on rapid re-housing and homeless prevention activities.

1) Rapid Re-housing - Housing Relocation and Stabilization Services.

Housing relocation and stabilization services will include payments to housing owners, utility companies and other third parties for the following costs: rental application fees, security deposits that equal no more than two month's rent, last month's rent, utility deposits, utility payments including up six months of utility arrears to support homeless individuals and families in moving as quickly as possible into permanent housing and to achieve stability in that housing. IHCDA thereby assisting an estimated 130 households with housing relocation and stabilization services statewide over the course of the award term. This estimate is based on an average rent of $550 per unit and that 65 percent of rapid re-housing is used for rental assistance, while 35 percent is reserved for housing relocation and stabilization services. No specific subpopulation will be targeted.

2) Rapid Re-housing – Rental Assistance.

The activity will include providing tenant based rental assistance to assist homeless individuals and families to move as quickly as possible into permanent housing and to achieve stability in that housing. The state program will require sub-recipients develop an outreach and centralized intake process for both the unsheltered and sheltered homeless populations. No specific subpopulations will be targeted. With the allocation amount of $ (includes $), IHCDA anticipates assisting an estimated 130 households with rental assistance statewide over the course of the award term. This estimate is based on an average rent of $550 per unit and that 65 percent of rapid re-housing is used for rental assistance, while 35 percent is reserved for housing relocation and stabilization services. The proportion of rental assistance to services was based on the same ratio maintained in the Homeless Prevention and Rapid Re-housing Program.

3) Data Entry Activity – Homeless Management Information Systems.

The activity will include reimbursement for salary costs incurred by the sub-recipient for completing data entry, monitoring and reviewing data quality, reporting to the HMIS lead agency (ICHDA), training staff on using the HMIS or comparable database, and paying staff travel costs to conduct intakes. This activity is limited to 1 percent of the overall budget. Sub-recipients will not be required to budget for this activity; however all are required to participate in the HMIS system, as provided by Client Track, Subrecipients are required to produce regular reports from the HMIS in conjunction with HUD and IHCDA requirements. The sub-recipients agree to enter data into the HMIS program on a regular and consistent basis. In the case of ESG-RR and Homeless Prevention funds, this entry must be completed essentially in "real time" so that all funds related to eligible activities may be directly tied to program participants. IHCDA will monitor data entry and data quality on an ongoing basis. ESG is anticipated to fund the Data Entry activity for approximately 1 percent of the total second round allocation. $

Discussion of Funding Priorities. The State of Indiana will provide funding for rapid re-housing, homeless prevention, outreach, operations, essentials and data entry activities based on the experience of administering the Emergency Solutions Grant for the 2012 year.

Rapid re-housing rental assistance will be given a higher percentage of funding over the homeless prevention rental assistance because Indiana had many agencies requesting homeless prevention funding due to the lack of other funding opportunities in the community. We also had requests of other activities like outreach as a way to bring people from the streets to a safe environment like an emergency homeless shelter can offer. A lack of short term or medium term rental assistance programs and adequate housing available to families continues to be a major obstacle in addressing underserved needs in many Indiana communities. The Indiana Permanent Supportive Housing Initiative prioritizes decreasing the number of homeless households with children. Additionally, by using ESG funds to retool the homeless response system, homeless services are being transformed to crisis response systems that rapidly return people who experience homelessness to stable housing.

Written Standards for Provision of ESG Assistance

This section includes written standards for providing the proposed assistance and describes the requirements for sub-recipients to establish and implement written standards.

1) **Describe the standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG.**

   The Housing and Program Steering committee of the Indiana Planning Council on the Homeless is working with the state ESG program to develop and coordinate regional centralized intake and triage centers to ensure access to assistance is driven by the needs of persons experiencing homelessness. IHCDA is the collaborative applicant within the CoC and IHCDA responded to the 2012 NOFA for a Central Intake Grant to continue and improve the CoC intake and triage system. This system will provide guidance to ESG sub-recipients for locating proper housing based upon the client's need – whether it is through the outreach team to find a shelter, or rental assistance for permanent housing or for a person who would qualify for a permanent supportive housing. Once a person/household is identified as homeless or is at risk of being homeless, their housing case manager will complete an online intake and assessment using the web-based Indiana Housing Opportunities Planner and Evaluator (I-HOPE) triage tool to assist in identifying all housing options most applicable to the household. Selection for the program will be based on income, employment history, housing history, homeless status and ability to sustain their housing upon completion of the program.

2) **Describe the policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.**

   ESG subrecipients will be required to create MOU's with all shelter providers, housing agencies, community action agencies, township trustees, mental health centers, health clinics and homeless service providers in their proposed service area. In addition, ESG subrecipients must use a centralized triage intake point for all persons experiencing a housing crisis in their service area. The I-HOPE tool will assist in providing a comprehensive list of housing options appropriate for the household based on their responses to questions within the tool. HUD Veterans Affairs Supportive Housing (HUD-VASH), VA Homeless Providers Grant and Per Diem Program, Shelter Plus Care program, Supportive Housing Program and local shelters and transitional housing providers are all included as housing resources in the I-HOPE tool results.

   Additionally, as part of the proposal process, applicants are required to develop a program design that is inclusive not only of other targeted homeless services, but also of other mainstream resources such as public housing programs, programs receiving project-based or tenant-based Section 8, Supportive Housing for persons with disabilities (Section 811), HOME

Investment Partnerships Program, Temporary Assistance for Needy Families (TANF), State Children's Health Insurance Program, Head Start, Mental Health and Substance Abuse Block Grants and services funded under the Workforce Investment Act. IHCDA encourages programs to be strategic and comprehensive in their program design by requiring applicants to include all available resources to the maximum extent practicable.

3) Describe the policies and procedures for determining and prioritizing which eligible families and individuals for homelessness prevention assistance and for rapid re-housing assistance.

For persons who are utilizing Rapid Rehousing Funds must: meet the criteria under paragraph (1) of the "homeless" definition in 24 CFR § Part 576.2 or who meet the criteria under paragraph (4) of the "homeless" definition and live in an emergency shelter or other palace described in paragraph (1) of the "homeless "definition are eligible to receive rapid re-housing assistance. Within this definition, a determination on suitable participants will be based on factors such as income, employment history, housing history, homeless status and ability to sustain their housing upon completion of the program.

Those persons who will be utilizing homeless prevention funds must: meet the criterion under the interim rule clarifies the definition of ''at risk of homelessness'' under section 401(1) of the McKinney-Vento Act. The definition includes three categories under which an individual or family may qualify as ''at risk of homelessness.'' For an individual or family to qualify as ''at risk of homelessness'' under the first category of the definition, the individual or family must meet two threshold criteria and must exhibit one or more specified risk factors. The two threshold criteria, as provided in the statute, are:

- (1) The individual or family has income below 30 percent of median income for the geographic area; and (2) the individual or family has insufficient resources immediately available to attain housing stability. Under the interim rule, the first criterion refers specifically to annual income and to median family income for the area, as determined by HUD.

- (2) Second criterion is interpreted as, ''the individual or family does not have sufficient resources or support networks, e.g., family, friends, faith based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the homeless definition [in § 576.2

For homeless prevention, the risk categories to further ensure consistency of interpretation, the interim rule also clarifies several of the risk factors that pertain to the first category of individuals and families who qualify as ''at risk of homelessness.'' As provided under the statute, the pertinent risk factors are as follows:

- (1) Has moved frequently because of economic reasons; (2) is living in the home of another because of economic hardship; (3) has been notified that their right to occupy their current housing or living situation will be terminated; (4) lives in a hotel or motel; (5) lives in severely overcrowded housing; (6) is exiting an institution; or (7) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

4) Describe the standards for determining the share, if any, of rent and utilities costs that each program participant must pay, if any, while receiving homeless prevention or rapid re-housing assistance.

Participants who receive rental assistance through rapid rehousing or homeless prevention are expected to pay 30 percent of their income for rent and utilities. IHCDA provides an Excel based worksheet which automatically calculates the tenant rent and utility portion allowable household income is entered. Sub-recipients will be responsible for ensuring that assisted rental units meet rent reasonable standards, are below fair market rent and meet habitability standards before any rental payments are approved. The tenant's portion and ESG subsidy will be calculated upon acceptance into the program and determination of need for rental assistance.

The tenant's portion of rent is calculated on the basis of allowable household income. Tenant rents are paid directly to the landlord and are subject to the same timeliness requirements as the overall rent. Any late fees incurred while receiving ESG will be the tenant's responsibility to pay.

5) Describe the standards for determining the duration of rental assistance and whether and how the amount of assistance will be adjusted over time.

Participants can receive up to 12 months of rental assistance per award year, and up to a maximum of 24 months of rental assistance in a three year period. The award term will be 18 months. All funds associated with that award year must be expended upon completion of the award term. All rapid re-housing participants must be re-evaluated for eligibility at least once every year. Program participants receiving rental assistance must pay 30 percent of their household income each month towards rent and utilities throughout the duration of their participation with ESG. Tenant payments will not be adjusted as income is increased. Payment of rental arrears consisting of a one-time payment for up to six months of rental arrears, including any late fees on those arrears is also an eligible expense. All persons assisted with program will qualify for up to 12 months of rental assistance and up to 18 months of services. Case managers will use the Arizona Self Sufficiency Matrix tool, which is built into the HMIS, to ensure participants receive the appropriate level of assistance.

6) Describe the standards for determining the type, amount, and duration of housing stabilization or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive. Limits should include the maximum amount of assistance, maximum number of months the program participant is eligible to receive assistance; and the maximum number of times the program participants may apply for assistance.

Participants can receive up to 18 months of housing relocation and stabilization services during the award term. Participants cannot receive more than 24 months of these services within a three year period. Housing relocation and stabilization services includes financial assistance activities such as moving costs, rental application fees, security deposits, last month's rent, utility deposits and utility payments; and services such as housing search and placement, housing stability case management, mediation, legal services, credit repair. No limit will be placed on the amount or type of services provided per participant as sub-recipients are encouraged to spend the funds as needed by the tenant through active engagement with the participant. The amount and type of services will be determined largely at the time of intake when the housing case manager completes a housing assessment on the participant. The assessment largely consists of using the Arizona Self-Sufficiency matrix tool, which uses a vulnerability index to determine the most urgent needs as it relates to housing. This tool is also built into the HMIS.

Training in "housing first" case management will be provided to housing case managers on determining appropriate assistance levels and participant engagement. Participants can be assisted with housing stability case management for up to 30 days during the period the program participant is seeking permanent housing and cannot exceed 18 months total during the period the program participant is living in permanent housing.

Process for Making Sub-Awards

IHCDA plans to allocate funding to approximately 8-10 agencies to administer the ESG Rapid Re-housing and Homeless Prevention Components of the ESG program.

There will be approximately 60 agencies that will apply for the operations, essentials, financial assistance and approximately 1 agency applying for an outreach component. A request for proposals will be distributed to all the Regional Planning Councils on the Homeless throughout the state, to the current subrecipients of the ESG program, current permanent supportive housing rental assistance programs (mental health centers, housing agencies, community action agencies, non profits) who have had experience with rental assistance and also have had experience with the previous Homeless Prevention and Rapid Re-housing Program (HPRP). Each proposal will be reviewed by at least one IHCDA Community Services staff person and by the Funding and Strategies committee of the Indiana Planning Council on the Homeless. Each reviewer will complete a scoring tool, assigning points based on the following program design components: outreach system, centralized intake point, systems coordination, organizational capacity, permanent housing placement strategy, history of administering the rental assistance programs, amount of match provided and coordination with ESG Entitlement City funds (as applicable). Each sub-recipient will be awarded based upon the homeless need in their community and their ability to provide match. This amount could be between $50,000 - $350,000 each. .

Homeless Participation Requirements.

Any ESG recipient that cannot meet the participation requirement under CFR § 576.405(a) must include a plan that meets the requirements under CFR § 576.405(b). This section describes how the participation requirement has been met.

The State ESG recipient – IHCDA - has a previous homeless person that is member of the Steering Committee that provides guidance to our CoC Programs and their policies and procedures. He currently lives in a permanent supportive housing program. The State of Indiana recognizes the invaluable perspective of homeless and formerly homeless individuals in developing an effective client-centered program and system. The State program strongly encourages sub-recipients of the ESG program to incorporate this participation, to the maximum extent practicable, in a policy-making function of both the organization and the respective regional Planning Council on the Homeless. The State ESG program application requires applicants to explain how homeless participation is achieved at both an organizational level and within their regional Planning Councils on the Homeless. This issue is also reviewed at each program monitoring visit.

Performance Standards . This section describes the performance standards, which were in consultation with the Continuum(s) of Care, for evaluating success of ESG activities.

The performance standards were developed in conjunction with the governing body for the Balance of State CoC, the Steering Committee and approved by the Indiana Planning Council on the Homeless by using the national standards outlined in Section 427 of the McKinney-Vento Act, as amended by the HEARTH Act.

Baseline performance measurements will be reports generated by the HMIS system and mainly from the Annual Progress Reports and the ESG reports for the 2012 year. Two of the standards are specific to the subrecipient's program performance and the remaining two are specific to system outcomes.

For 2013, ESG rental assistance program sub-recipients: At discharge from program, 82 percent persons assisted will still be permanently housing. 65 percent of persons will increase their income.

For 2013 ESG program sub-recipients that are Emergency shelters that have activities: operations, essential services and financial assistance: 50 percent persons will discharge to permanent housing, 25 percent of person's will increase their income.

For 2013 ESG program sub-recipients that are Transitional Housing programs that have activities: operations, essential services and financial assistance: 69 percent will discharge to permanent housing, 50 percent will increase their income.

For 2013 ESG program sub-recipients that have outreach component: 50 percent of identified caseload will be permanently housed.

For 2013 ESG program sub-recipients that have outreach component: 50 percent identified caseload will increase their income.

The final two standards establish system-wide standards for the ESG program. The first sets a standard on the length of time that an individual or family remains homeless in the ESG service area.

1. The average length of stay of participants in ESG funded and other CoC programs should reduce by at least 10 percent by 2014 fiscal year.
2. The second system standard involves the extent to which individuals and families who leave homelessness experience additional episodes of homelessness. HUD has not released a recidivism methodology so until we receive a method, the Steering Committee along with the Data and Evaluation Committee will establish a methodology in the 2013 year. Since we started utilizing a new open HMIS system in March 2012, it has been an easier system to generate reports, utilize case management more thoroughly and produce special reports. Once a methodology is established, the Balance of State CoC will establish a baseline to track recidivism within ESG and all other CoC programs .The Continuum will focus on goals that will reduce returns to homelessness.

Both of these standards were set based upon HUD's stated performance targets for a high performing CoC. The CoC will use the HMIS system to measure these outcomes.

HOPWA Method of Distribution

Method of Distribution—HOPWA

Priority for funding has been given to Care Coordination sites to continue to foster the link between care plans and housing plans to meet the underserved needs of our clients who are in care coordination but not receiving HOPWA assistance or who are receiving limited housing assistance.

Funds will be made available in the following percentages of the total awards made to project sponsors:

- At least 60 percent to direct housing assistance: long-term rental assistance, short term rental assistance, and facility based operations;
- No more than 7 percent to sponsor administration and 3 percent to grantee administration;
- No more than 35 percent to housing information and permanent housing placement activities;
- No more than 35 percent to supportive services that positively affect recipients' housing stability

IHCDA uses the following indicators to determine their ability to achieve the desired outcomes:

- Rental Assistance—households/units
- Short-term rent, mortgage and utility assistance—households/units
- Facility based housing operations support—units
- Housing information services—households
- Permanent housing placement services—households
- Supportive services - households

Each of the households assisted with direct housing assistance will be required to have a housing plan completed by their case manager to identify areas of special need. IHCDA encourages the case manager completing the housing plan to work directly with the client and their care coordinator to identify how to improve their access to care. IHCDA expects the case manager to work with the client to achieve housing stability for those who are homeless and achieve housing stability and reduce risks of homelessness for those who are would be homeless but for this assistance.

Project sponsor selection process. IHCDA worked with the Indiana State Department of Health to develop the criteria for selecting project sponsors for the 2013 HOPWA program. IHCDA is a member of the Comprehensive HIV Services Planning and Advisory Council which consists of both advocates and consumers of the HIV/AIDS resources available to the State. The 2013 HOPWA project sponsors will be monitored based on the guidelines set forth in the Housing Opportunities for Persons with AIDS (HOPWA) Grantee Oversight Resource Guide. Twenty percent of the project sponsors will be monitored per year.

IHCDA will encourage the project sponsors to continue housing plans for each of their clients to increase homeless prevention activities. IHCDA will also encourage the project sponsors to make use of any items made available by the State to assist with placing clients into housing with subsidies other than HOPWA. or program year 2013 funding, IHCDA will facilitate a competitive request for qualifications (RFQ) for HIV/AIDS service providers. The RFQ will be competitive in order to allocate funding based on six criteria:

1. How long the agency has served the population as an Indiana State Department of Health care coordination site.
2. What housing services the organization provides.
3. Experience providing HOPWA assistance.
4. How HOWPA will meet the unmet housing need in an area.
5. Involvement with local Regional Planning Council/ Committees/Leadership roles within RPC.
6. How the agency has been involved with the Indiana Triage Project.

To ensure the broadest possible dissemination, IHCDA will distribute the HOPWA RFQ in April via the statewide Continua of Care network and post online. Because IHCDA allocates HOPWA to all ISDH-established care coordination regions except Region 7, it was determined that IHCDA will fund one HOPWA project sponsor per every care coordination region. This will remain true for all care coordination regions. If a distinct eligible population with specific needs exists in a region (for example, homeless men in Lake County), IHCDA will work with the regional sponsor to tailor services to meet the needs of the population. In instances where the sponsor cannot meet these needs, the sponsor will have the ability to sub-grant a portion of its HOPWA award to another service provider.

The project sponsors will be chosen in May, therefore information regarding the 2013 project sponsors is unavailable at this time. HOPWA allocations for the 2013 program year will reflect a combination of regional epidemiological need and past performance with previous HOPWA awards.

Figure V-4.
HOPWA Service Area Counties by Care of Coordination Region

Indiana HIV Care Coordination Region	Counties Served
Region 1	Lake, Porter, LaPorte
Region 2	St. Joseph, Elkhart, Starke, Marshall, Pulaski, Fulton
Region 3	LaGrange, Steuben, Kosciusko, Noble, DeKalb, Whitley, Allen, Wabash, Huntington, Wells, Adams
Region 4	Newton, Jasper, Benton, White, Warren, Tippecanoe, Carroll, Fountain, Montgomery, Clinton
Region 5	Grant, Blackford, Jay, Delaware, Randolph
Region 6	Cass, Miami, Howard, Tipton, Hamilton, Madison, Hancock
Region 7*	Boone, Hendricks, Marion, Morgan, Johnson, Shelby
Region 8	Vermillion, Parke, Putnam, Vigo, Clay, Sullivan
Region 9	Henry, Wayne, Rush, Fayette, Union, Decatur, Franklin, Ripley, Dearborn, Ohio
Region 10	Owen, Greene, Monroe, Brown, Bartholomew, Lawrence
Region 11	Jackson, Jennings, Orange, Washington, Scott, Jefferson, Switzerland, Crawford, Harrison, Floyd, Clark
Region 12	Knox, Daviess, Martin, Gibson, Pike, Dubois, Posey, Vanderburgh, Warrick, Spencer, Perry

Note: * = Not supported by IHCDA HOPWA funding.

Source: Indiana Housing and Community Development Authority.

Section 108 Loan Program

Community Enhancement and Economic Development Activities

State of Indiana Community Enhancement and Economic Development Loan Program

Section 108 Guaranteed Loan Program

Indiana Office of Community and Rural Affairs

Indiana Housing and Community Development Authority

Indiana Community Enhancement and Economic Development (CEED) Loan Fund Basics

The Indiana Office of Community Rural Affairs (OCRA) and the Indiana Housing and Community Development Authority (IHCDA) seek to establish a loan pool with federally guaranteed loan proceeds offered through the U.S. Department of Housing and Urban Development (HUD). Indiana receives an annual federal entitlement under the Community Development Block Grant (CDBG) Program. In accordance with the federal regulations found in 24 CFR 570, Subpart M, a state may develop procedures and requirements to assist non-federal entitlement public entities to apply for loans from the HUD Section 108 Loan Guarantee Program. The state proposes to assist public entities by providing access to a State managed loan pool, which shall be funded with Section 108 loan proceeds in an amount not to exceed $140,000,000.

Utilizing a non-competitive method of distribution, the State will make third party loans to units of local government for three purposes:

1. Economic Development
2. Housing Development
3. Community Development

A complete description of the standard method of distribution is available for public review in the Annual Action Plan posted at www.in.gov/ocra. This application shall serve as a first amendment for program year 2012 to the Annual Action Plan, and shall modify the Action Plan only to expand on the method of distribution for the purpose of describing the State's method for deploying and repaying the Section 108-guaranteed loan.

Only units of local government that do not receive direct allocations of Community Development Block Grant from the U.S. Department of Housing and Urban Development may apply to the State of Indiana's Indiana Housing and Economic Loan Fund, or CEED Fund, and applications for loans from the CEED fund may be only for the project types listed below. The total maximum amount of CEED financing that an eligible public entity may receive is limited to $7,000,000. A minimum loan request of $1,000,000 is required.

Loans made from the CEED fund shall be repaid from project revenue or other revenue pledged specifically for repayment of the loan, such as tax increment financing revenue. For all loans, the State will require additional security to be pledged for loan repayment. Specific security requirements depend on the loan type, as outlined below. The maximum term of CEED loans shall not exceed twenty (20) years.

All applicants to the CEED Fund must supply:

1. A complete application package
2. Business or project plan
3. Statement of detailed sources and uses
4. Statement of projected cash flow for the life of the loan
5. Current and two most recent audited consolidated financial statements for key principals (end borrowers), as well as interim financials (for corporations and partnerships) and/or personal financial statements (for individuals).

6. Supporting documentation, as appropriate, including but not limited to: market, feasibility, or demand studies; environmental studies; geotechnical reports; current real estate appraisals; proof of site control; land surveys.

CEED Loan Products

Terms Applicable to All Loan Products

- **Cost Reasonableness:** All proposed uses for the loan proceeds must be reasonable in cost, as determined by Lender in its sole discretion. Borrowers must support cost estimates as appropriate by, for example, fair-market/third-party price quotations, contractor/engineer estimates, appraisals, or executed contracts.

- **Proportional Disbursement:** To the extent practicable, the Section 108 loan funds should be disbursed on a pro rata basis with other funding sources to avoid placing the Section 108 Loan funds at a greater risk than other funding sources. a) Lender will review construction or operating business cash flow statements and Sources and Uses statements to confirm that Section 108 loan funds will be expended at the same ratio as other funding sources. b) Lender will also review other funding sources' policies on the expenditure of funds. If these policies require the public funds to be disbursed first, lender reserves the right to negotiate with other lenders, equity providers and subsidy providers to attempt to modify these policies. If Section 108 funds must still be expended first, lender reserves the right to require safeguards such as performance or completion bonds.

- **Key Principals Capacity:** To confirm this, lender will evaluate information provided by borrower in a form acceptable to lender, including but not limited to: a) Roles and responsibilities of each team member; b) Experience with similar types of developments; and c) Qualifications and background of each team member.

- **Financing Commitments:** Lender will review the Sources in the Sources and Uses statement (or cash flow statement, in the case of operating capital loans) to determine in its sole discretion if sufficient sources of funds have been identified and are committed to the project, including but not limited to debt, subsidy, sponsor equity, and outside equity. The terms and conditions of all other sources of funding, including but not limited to terms, covenants, lien position, and recourse must be disclosed. Borrower must provide evidence satisfactory to lender that all other funding sources are committed under terms acceptable to lender in its sole discretion, and that the participating financing parties have the financial capacity to provide the funds in a timely manner.

- **Loan Security:** The primary source of repayment for the Section 108 loan will be repayments of the second-level loans to third parties. The second source of repayment for the Section 108 loan will be security on the second-level loans. The third source of repayment shall be program income on the State's Disaster Recovery Community Development Block Grant. The fourth source of repayment shall be the State's annual allocation of Community Development Block Grant, as pledged in this application in accordance with Section 108 program regulations.

  All third party loans made by the State will be secured by:

1. A lien of no lower than second position on real property. Liens taken in second position will only be accepted when the State loan and superior debt together do not exceed 80 percent of the asset value as determined by a qualified appraisal; or
2. A lien of no lower than first position on new equipment. Liens on new equipment will only be accepted when the State loan does not exceed 80 percent of the asset value as determined by the purchase price; or
3. A lien of no lower than first position on used equipment. Liens on used equipment will only be accepted when the State loan does not exceed 65 percent of the asset value as determined by the purchase price; or
4. A lien of no lower than first position on personal property, inventory, or accounts receivable. Liens on personal property, inventory, or accounts receivable will only be accepted when the State loan does not exceed 65 percent of the asset value as determined by a qualified business valuation consultant; or
5. A pledge of increments in local tax receipts. Pledges of increments of local tax receipts will only be accepted for revenue streams with three or more years of demonstrated positive cash flow. The asset value shall be based on a seven percent (7%) discount rate, and the State loan shall not exceed 90 percent of the uncommitted value of the revenue stream; or
6. A pledge of other sources of public revenue, such as gaming revenue. Pledges of other public revenue will only be accepted for revenue streams with three or more years of demonstrated positive cash flow. The asset value shall be based on a seven percent (7%) discount rate, and the State loan shall not exceed 90 percent of the uncommitted value of the revenue stream; or
7. Other negotiated security, as deemed prudent and appropriate under the circumstances. Examples of such additional security that the State may require include but are not limited to: a. Liens on real and personal property; b. Debt Service Reserves; or c. Increments in local tax receipts generated by activities carried out with Section 108 loan funds.

Further, the State may at its discretion require borrowers to provide additional security including but not limited to: (a) personal guarantees, (b) debt service reserves, or (c)_other security mechanisms appropriate to the project.

Economic Development Loans

Local governments may apply for financing to be provided as a loan to a local business for expansion of its operations. Funds may be used for purposes including but not limited to: predevelopment, site acquisition, site preparation/land development, construction, purchase of machinery and equipment, or working capital. A project of this type would normally leverage other sources of funding and capital invested by the end borrower. Economic development projects must create new job opportunities to be filled by a minimum of 51% low-and-moderate income persons. The loan should be repaid by the business from net cash flow.

Site Acquisition Loans Evaluation Criteria: In addition to the criteria listed above, site acquisition loans will be evaluated against the following criteria:

- **Project Feasibility:** In addition to the financial feasibility of a project, an analysis will also be made on the feasibility of the overall development. The Section 108 loan application must be supported with additional documentation including but not limited to market studies, real estate appraisals, or feasibility studies. All such documentation must be prepared by a third party source that has the qualifications to perform the study, as determined by Lender in its sole discretion. Borrower must submit an operating pro forma clearly setting forth the sources with which the Borrower plans to repay permanent financing. Lender may also review engineering and other types of feasibility studies to properly evaluate the project.

- **Site Suitability:** Lender will also evaluate the project site and location, as follows: a) The project's structural and environmental conditions are satisfactory to lender in its sole discretion, as demonstrated by third party studies and reports including but not limited to: i) Property appraisal ii) Phase I Environmental Site Assessment, iii) Property condition assessment (iv.) If necessary, an operations and maintenance program for removal of asbestos, lead-based paint, radon, PCBs, other toxic waste, and the removal of underground storage tasks. b) The project must have appropriate and adequate zoning, as evidenced by: i) A statement from the community zoning officer that the proposed use of the site is classified as either a legal conforming or a legal non-conforming use under local zoning requirements. d) Proof of ownership and proper title to the property must be evident. e) Borrower must provide a survey of the property from a licensed land surveyor that includes, at a minimum, metes and bounds, a written legal description, easements, encumbrances, rights-of-way, physical features, and utility lines, all in form and content satisfactory to lender.
- **Financial Feasibility:** The project will be examined to determine its viability and assure that the public benefit anticipated from the Section 108 loan will be realized. a) Lender will evaluate current and historic financial statements of both the project sponsor and principals to evaluate completion risk based on sponsor financial capacity. Lender will examine income and expense statements for the proposed tenants relative to industry averages and prudent practice. Lender will also review project costs for reasonableness and feasibility. Finally, lender will analyze past, current, and projected financial data to determine if the job estimates are reasonable and supported by the data. Labor costs shall be evaluated against industry averages. b) The terms and conditions of the Section 108 loan must be appropriate. The interest rate should be set at a rate where available cash flow meets debt obligations with enough remaining cash flow to operate successfully and provide an acceptable debt-coverage ratio. Loan terms for Site Acquisition Loans are not anticipated to be longer than five (5) years, although Lender may approve exceptions in its sole discretion. If Site Acquisition Loans are to be taken out by permanent financing, they may at the lender's sole discretion be offered on an interest only basis with principal due at maturity. If the loan converts to a permanent loan, the term will not exceed the economic life of the asset being financed or twenty (20) years (whichever is shorter), as established by the Section 108 Program Guidelines. A longer loan amortization schedule (resulting in a balloon payment at maturity) may be justified on a case-by-case basis. Each loan application will include a written explanation of this assessment and the reason for requesting the loan terms and conditions.
- **Eligible Activity:** Acquisition 570.703(a); Payment of Interest 570.703(c)
- **National Objective:** Low-to-Moderate Income Benefit- Jobs

Site Preparation Loans: In addition to the criteria listed above, site preparation loans will be evaluated against the following criteria:

- **Project Feasibility:** In addition to the financial feasibility of a project, an analysis will also be made on the feasibility of the overall development. The Section 108 loan application must be supported with additional documentation including but not limited to market studies, real estate appraisals, or feasibility studies. All such documentation must be prepared by a third party source that has the qualifications to perform the study, as determined by Lender in its sole discretion. Borrower must submit an operating pro forma clearly setting forth the sources with which the Borrower plans to repay permanent financing. Lender may also review engineering and other types of feasibility studies to properly evaluate the project.
- **Site Suitability:** Lender will also evaluate the project site and location, as follows: a) The project's structural and environmental conditions are satisfactory to lender in its sole discretion, as demonstrated by third party studies and reports including but not limited to: i)

Property appraisal ii) Phase I Environmental Site Assessment, iii) Property condition assessment (iv.) If necessary, an operations and maintenance program for removal of asbestos, lead-based paint, radon, PCBs, other toxic waste, and the removal of underground storage tasks. b) The project must have appropriate and adequate zoning, as evidenced by: i) A statement from the community zoning officer that the proposed use of the site is classified as either a legal conforming or a legal non-conforming use under local zoning requirements. d) Proof of ownership and proper title to the property must be evident. e) Borrower must provide a survey of the property from a licensed land surveyor that includes, at a minimum, metes and bounds, a written legal description, easements, encumbrances, rights-of-way, physical features, and utility lines, all in form and content satisfactory to lender.

- **Financial Feasibility:** The project will be examined to determine its viability and assure that the public benefit anticipated from the Section 108 loan will be realized. a) Lender will evaluate current and historic financial statements of both the project sponsor and principals to evaluate completion risk based on sponsor financial capacity. Lender will examine income and expense statements for the proposed tenants relative to industry averages and prudent practice. Lender will also review project costs for reasonableness and feasibility. Finally, lender will analyze past, current, and projected financial data to determine if the job estimates are reasonable and supported by the data. Labor costs shall be evaluated against industry averages. b) The terms and conditions of the Section 108 loan must be appropriate. The interest rate should be set at a rate where available cash flow meets debt obligations with enough remaining cash flow to operate successfully and provide an acceptable debt-coverage ratio. Loan terms for Site Preparation Loans are not anticipated to be longer than five (5) years, although Lender may approve exceptions in its sole discretion. If Site Preparation Loans are to be taken out by permanent financing, they may at the lender's sole discretion be offered on an interest only basis with principal due at maturity. If the loan converts to a permanent loan, the term will not exceed the economic life of the asset being financed or twenty (20) years (whichever is shorter), as established by the Section 108 Program Guidelines. A longer loan amortization schedule (resulting in a balloon payment at maturity) may be justified on a case-by-case basis. Each loan application will include a written explanation of this assessment and the reason for requesting the loan terms and conditions.
- **Eligible Activity:** Payment of Interest on obligations guaranteed under this subpart 570.703(c); Relocation payments 570.703(d)(1) & 570.703(d)(2) ; Clearance/Demolition 570.703(e); Community Economic Development Projects 570.703(i)(1) & 570.703(i)(2); Site Preparation 570.703(f)(1) & 570.703(f)(2);
- **National Objective:** Low-to-Moderate Income Benefit- Jobs

Construction or Construction/Permanent Loans: In addition to the criteria listed above, construction or construction/permanent loans will be evaluated against the following criteria:

- **Project Feasibility:** In addition to the financial feasibility of a project, an analysis will also be made on the feasibility of the overall development. The Section 108 loan application must be supported with additional documentation including but not limited to market studies, real estate appraisals, or feasibility studies. All such documentation must be prepared by a third party source that has the qualifications to perform the study, as determined by Lender in its sole discretion. Borrower must submit an operating pro forma clearly setting forth the sources with which the Borrower plans to repay permanent financing. Lender may also review engineering and other types of feasibility studies to properly evaluate the project.
- **Site Suitability:** Lender will also evaluate the project site and location, as follows: a) The project's structural and environmental conditions are satisfactory to lender in its sole discretion, as demonstrated by third party studies and reports including but not limited to: i) Property appraisal ii) Phase I Environmental Site Assessment, iii) Property condition assessment (iv.) If necessary, an operations and maintenance program for removal of

asbestos, lead-based paint, radon, PCBs, other toxic waste, and the removal of underground storage tasks. b) The project must have appropriate and adequate zoning, as evidenced by: i) A statement from the community zoning officer that the proposed use of the site is classified as either a legal conforming or a legal non-conforming use under local zoning requirements. d) Proof of ownership and proper title to the property must be evident. e) Borrower must provide a survey of the property from a licensed land surveyor that includes, at a minimum, metes and bounds, a written legal description, easements, encumbrances, rights-of-way, physical features, and utility lines, all in form and content satisfactory to lender.

- **Financial Feasibility:** The project will be examined to determine its viability and assure that the public benefit anticipated from the Section 108 loan will be realized. a) Lender will evaluate current and historic financial statements of both the project sponsor and principals to evaluate completion risk based on sponsor financial capacity. Lender will examine income and expense statements for the proposed tenants relative to industry averages and prudent practice. Lender will also review project costs for reasonableness and feasibility. Finally, lender will analyze past, current, and projected financial data to determine if the job estimates are reasonable and supported by the data. Labor costs shall be evaluated against industry averages. b) The terms and conditions of the Section 108 loan must be appropriate. The interest rate should be set at a rate where available cash flow meets debt obligations with enough remaining cash flow to operate successfully and provide an acceptable debt-coverage ratio. The loan term will be based on the asset being financed. Loan terms for Construction Loans are not anticipated to be longer than five (5) years, although Lender may approve exceptions in its sole discretion. If Construction Loans are to be taken out by permanent financing, they may at the lender's sole discretion be offered on an interest only basis with principal due at maturity. If the loan converts to a permanent loan, the term will not exceed the economic life of the asset being financed or twenty (20) years (whichever is shorter), as established by the Section 108 Program Guidelines. A longer loan amortization schedule (resulting in a balloon payment at maturity) may be justified on a case-by-case basis. Each loan application will include a written explanation of this assessment and the reason for requesting the loan terms and conditions. If the loan includes a permanent financing component, Lender may at its sole discretion require borrower to capitalize a debt service reserve with loan proceeds.
- **Eligible Activity:** Rehabilitation 570.703(b); Payment of Interest 570.703(c); Relocation 570.703(d)(1) & 570.703(d)(2); Clearance, Demolition and Removal 570.703(e); Site Preparation 570.703(f)(1) & 570.703(f)(2); Community Economic Development Projects 570.703(i)(1) & 570.703(i)(2); Debt Service Reserve 570.703(k);
- **National Objective:** Low-to-Moderate Income Benefit- Jobs

Equipment Loans: In addition to the criteria listed above, equipment loans will be evaluated against the following criteria:

- **Project Feasibility:** In addition to the financial feasibility of a project, an analysis will also be made on the feasibility of the overall development. The Section 108 loan application must be supported with additional documentation including but not limited to a business expansion plan evidencing need for the equipment, cost estimates, and evidence acceptable to lender that the proposed equipment purchase is the optimal choice. All such documentation must be prepared by a third party source that has the qualifications to perform the study, as determined by Lender in its sole discretion. Borrower must submit a business operating cashflow statement clearly setting forth the sources with which the Borrower plans to repay financing. Lender may also review engineering and other types of feasibility studies to properly evaluate the project.
- **Financial Feasibility:** The project will be examined to determine its viability and assure that the public benefit anticipated from the Section 108 loan will be realized. a) Lender will

evaluate current and historic financial statements of both the project sponsor and principals to evaluate completion risk based on sponsor financial capacity. Lender will examine income and expense statements for the proposed tenants relative to industry averages and prudent practice. Lender will also review project costs for reasonableness and feasibility. Finally, lender will analyze past, current, and projected financial data to determine if the job estimates are reasonable and supported by the data. Labor costs shall be evaluated against industry averages. b) The terms and conditions of the Section 108 loan must be appropriate. The interest rate should be set at a rate where available cash flow meets debt obligations with enough remaining cash flow to operate successfully and provide an acceptable debt-coverage ratio. The term will not exceed the economic life of the asset being financed or twenty (20) years (whichever is shorter), as established by the Section 108 Program Guidelines. A longer loan amortization schedule (resulting in a balloon payment) may be justified on a case-by-case basis. Each loan application will include a written explanation of this assessment and the reason for requesting the loan terms and conditions. Lender reserves the right to require: a) pre-approval of the cost, condition, and quality of the equipment to be financed; and b) a debt service reserve capitalized with loan proceeds.

- **Eligible Activity:** Payment of Interest 570.703(c); Community Economic Development Projects 570.703(i)(1) & 570.703(i)(2); Debt Service Reserve 570.703(k);
- **National Objective:** Low-to-Moderate Income Benefit- Jobs; Elimination of Slum and Blight

Working Capital Loans: In addition to the criteria listed above, working capital loans will be evaluated against the following criteria:

- **Project Feasibility:** In addition to the financial feasibility of a project, an analysis will also be made on the feasibility of the development. The Section 108 loan application must be supported with additional documentation including but not limited to business cash flow statements, a business plan, and information on the borrower's product cycle. All such documentation must be prepared by a third party source that has the qualifications to perform the study, as determined by Lender in its sole discretion. For non-revenue producing projects such as community facilities, Borrower must submit an operating pro forma clearly setting forth the sources with which the Borrower plans to repay loan funds. Lender may also review engineering and other types of feasibility studies to properly evaluate the project
- **Financial Feasibility:** The project will be examined to determine its viability and assure that the public benefit anticipated from the Section 108 loan will be realized. a) Lender will evaluate current and historic financial statements of both the project sponsor and principals to evaluate completion risk based on sponsor financial capacity. Lender will examine income and expense statements for the proposed tenants relative to industry averages and prudent practice. Lender will also review project costs for reasonableness and feasibility. Finally, lender will analyze past, current, and projected financial data to determine if the job estimates are reasonable and supported by the data. Labor costs shall be evaluated against industry averages. b) The terms and conditions of the Section 108 loan must be appropriate. The interest rate should be set at a rate where available cash flow meets debt obligations with enough remaining cash flow to operate successfully and provide an acceptable debt-coverage ratio. Operating Capital Loans are anticipated to be repaid primarily from business income, including revenue from sales or services provided. Each loan application will include a written explanation of the anticipated source of repayment and the reason for requesting the loan terms and conditions. Lender reserves the right to require a debt service reserve capitalized with loan proceeds.
- **Eligible Activity:** Payment of Interest 570.703(c); Community Economic Development Projects 570.703(i)(1) & 570.703(i)(2); Debt Service Reserve 570.703(k);

- **National Objective:** Low-to-Moderate Income Benefit- Jobs; Elimination of Slum and Blight

Housing Development Loans

Local governments may apply for financing to support a nonprofit housing developer's efforts to produce new construction or rehabilitated housing for sale or rent. Housing projects must achieve a CDBG national objective.

Site Acquisition Loans: In addition to the criteria listed above, housing site acquisition loans will be evaluated against the following criteria:

- **Project Feasibility:** In addition to the financial feasibility of a project, an analysis will also be made on the feasibility of the development. The Section 108 loan application must be supported with additional documentation including but not limited to market studies, real estate appraisals, housing demand studies, or feasibility studies. All such documentation must be prepared by a third party source that has the qualifications to perform the study, as determined by Lender in its sole discretion. For non-revenue producing projects such as community facilities, Borrower must submit an operating pro forma clearly setting forth the sources with which the Borrower plans to repay loan funds. Lender may also review engineering and other types of feasibility studies to properly evaluate the project
- **Site Suitability:** Lender will also evaluate the project site and location, as follows: a) The project's structural and environmental conditions are satisfactory to lender in its sole discretion, as demonstrated by third party studies and reports including but not limited to: i) Property appraisal ii) Phase I Environmental Site Assessment, iii) Property condition assessment (iv.) If necessary, an operations and maintenance program for removal of asbestos, lead-based paint, radon, PCBs, other toxic waste, and the removal of underground storage tasks. b) The project must have appropriate and adequate zoning, as evidenced by: i) A statement from the community zoning officer that the proposed use of the site is classified as either a legal conforming or a legal non-conforming use under local zoning requirements. d) Proof of ownership and proper title to the property must be evident. e) Borrower must provide a survey of the property from a licensed land surveyor that includes, at a minimum, metes and bounds, a written legal description, easements, encumbrances, rights-of-way, physical features, and utility lines, all in form and content satisfactory to lender.
- **Financial Feasibility:** The project will be examined to determine its viability and assure that the public benefit anticipated from the Section 108 loan will be realized. a) Lender will evaluate current and historic financial statements of both the project sponsor and principals to evaluate completion risk based on sponsor financial capacity. Lender will examine income and expense statements for the proposed tenants relative to industry averages and prudent practice. Lender will also review project costs for reasonableness and feasibility. Finally, lender will analyze past, current, and projected financial data to determine if the job estimates are reasonable and supported by the data. Labor costs shall be evaluated against industry averages. b) The terms and conditions of the Section 108 loan must be appropriate. The interest rate should be set at a rate where available cash flow meets debt obligations with enough remaining cash flow to operate successfully and provide an acceptable debt-coverage ratio. Loan terms for Construction Loans are not anticipated to be longer than five (5) years, although Lender may approve exceptions in its sole discretion. If Site Acquisition Loans are to be taken out by permanent financing, they may at the lender's sole discretion be offered on an interest only basis with principal due at maturity. If the loan converts to a permanent loan, the term will not exceed the economic life of the asset being financed or twenty (20) years (whichever is shorter), as established by the Section 108 Program Guidelines. A longer loan amortization schedule (resulting in a balloon payment at maturity) may be justified on a case-

by-case basis. Each loan application will include a written explanation of this assessment and the reason for requesting the loan terms and conditions.

- **Eligible Activity:** Acquisition 570.703(a); Payment of Interest 570.703(c)
- **National Objective:** Low-to-Moderate Income Benefit- Housing; Elimination of Slum and Blight

Construction or Construction/Permanent Loans: In addition to the criteria listed above, housing site acquisition loans will be evaluated against the following criteria:

- **Project Feasibility:** In addition to the financial feasibility of a project, an analysis will also be made on the feasibility of the development. The Section 108 loan application must be supported with additional documentation including but not limited to market studies, real estate appraisals, housing demand studies, or feasibility studies. All such documentation must be prepared by a third party source that has the qualifications to perform the study, as determined by Lender in its sole discretion. For non-revenue producing projects such as community facilities, Borrower must submit an operating pro forma clearly setting forth the sources with which the Borrower plans to repay loan funds. Lender may also review engineering and other types of feasibility studies to properly evaluate the project
- **Site Suitability:** Lender will also evaluate the project site and location, as follows: a) The project's structural and environmental conditions are satisfactory to lender in its sole discretion, as demonstrated by third party studies and reports including but not limited to: i) Property appraisal ii) Phase I Environmental Site Assessment, iii) Property condition assessment (iv.) If necessary, an operations and maintenance program for removal of asbestos, lead-based paint, radon, PCBs, other toxic waste, and the removal of underground storage tasks. b) The project must have appropriate and adequate zoning, as evidenced by: i) A statement from the community zoning officer that the proposed use of the site is classified as either a legal conforming or a legal non-conforming use under local zoning requirements. d) Proof of ownership and proper title to the property must be evident. e) Borrower must provide a survey of the property from a licensed land surveyor that includes, at a minimum, metes and bounds, a written legal description, easements, encumbrances, rights-of-way, physical features, and utility lines, all in form and content satisfactory to lender.
- **Financial Feasibility:** The project will be examined to determine its viability and assure that the public benefit anticipated from the Section 108 loan will be realized. a) Lender will evaluate current and historic financial statements of both the project sponsor and principals to evaluate completion risk based on sponsor financial capacity. Lender will examine income and expense statements for the proposed tenants relative to industry averages and prudent practice. Lender will also review project costs for reasonableness and feasibility. Finally, lender will analyze past, current, and projected financial data to determine if the job estimates are reasonable and supported by the data. Labor costs shall be evaluated against industry averages. b) The terms and conditions of the Section 108 loan must be appropriate. Loan terms for Construction Loans are not anticipated to be longer than five (5) years, although Lender may approve exceptions in its sole discretion. If Construction Loans are to be taken out by permanent financing, they may at the lender's sole discretion be offered on an interest only basis with principal due at maturity. If the loan converts to a permanent loan, the term will not exceed the economic life of the asset being financed or twenty (20) years (whichever is shorter), as established by the Section 108 Program Guidelines. A longer loan amortization schedule (resulting in a balloon payment at maturity) may be justified on a case-by-case basis. Each loan application will include a written explanation of this assessment and the reason for requesting the loan terms and conditions. If the loan includes a permanent financing component, Lender may at its sole discretion require borrower to capitalize a debt service reserve with loan proceeds.

- **Eligible Activity:** Payment of Interest 570.703(c); Relocation 570.703(d)(1) & 570.703(d)(2); Community Economic Development Projects 570.703(i)(1) & 570.703(i)(2); Debt Service Reserve 570.703(k);
- **National Objective:** Low-to-Moderate Income Benefit- Housing; Elimination of Slum and Blight

Housing Rehabilitation Loans In addition to the criteria listed above, housing rehabilitation loans will be evaluated against the following criteria:

- **Project Feasibility:** In addition to the financial feasibility of a project, an analysis will also be made on the feasibility of the development. The Section 108 loan application must be supported with additional documentation including but not limited to market studies, real estate appraisals, housing demand studies, or feasibility studies. All such documentation must be prepared by a third party source that has the qualifications to perform the study, as determined by Lender in its sole discretion. For non-revenue producing projects such as community facilities, Borrower must submit an operating pro forma clearly setting forth the sources with which the Borrower plans to repay loan funds. Lender may also review engineering and other types of feasibility studies to properly evaluate the project
- **Site Suitability:** Lender will also evaluate the project site and location, as follows: a) The project's structural and environmental conditions are satisfactory to lender in its sole discretion, as demonstrated by third party studies and reports including but not limited to: i) Property appraisal ii) Phase I Environmental Site Assessment, iii) Property condition assessment (iv.) If necessary, an operations and maintenance program for removal of asbestos, lead-based paint, radon, PCBs, other toxic waste, and the removal of underground storage tasks. b) The project must have appropriate and adequate zoning, as evidenced by: i) A statement from the community zoning officer that the proposed use of the site is classified as either a legal conforming or a legal non-conforming use under local zoning requirements. d) Proof of ownership and proper title to the property must be evident. e) Borrower must provide a survey of the property from a licensed land surveyor that includes, at a minimum, metes and bounds, a written legal description, easements, encumbrances, rights-of-way, physical features, and utility lines, all in form and content satisfactory to lender.
- **Financial Feasibility:** The project will be examined to determine its viability and assure that the public benefit anticipated from the Section 108 loan will be realized. a) Lender will evaluate current and historic financial statements of both the project sponsor and principals to evaluate completion risk based on sponsor financial capacity. Lender will examine income and expense statements for the proposed tenants relative to industry averages and prudent practice. Lender will also review project costs for reasonableness and feasibility. Finally, lender will analyze past, current, and projected financial data to determine if the job estimates are reasonable and supported by the data. Labor costs shall be evaluated against industry averages. b) The terms and conditions of the Section 108 loan must be appropriate. The interest rate should be set at a rate where available cash flow meets debt obligations with enough remaining cash flow to operate successfully and provide an acceptable debt-coverage ratio. Loan terms for Housing Rehabilitation Loans are not anticipated to be longer than five (5) years, although Lender may approve exceptions in its sole discretion. If Housing Rehabilitation Loans are to be taken out by permanent financing, they may at the lender's sole discretion be offered on an interest only basis with principal due at maturity. If the loan converts to a permanent loan, the term will not exceed the economic life of the asset being financed or twenty (20) years (whichever is shorter), as established by the Section 108 Program Guidelines. A longer loan amortization schedule (resulting in a balloon payment at maturity) may be justified on a case-by-case basis. Each loan application will include a written explanation of this assessment and the reason for requesting the loan terms and

conditions. If the loan includes a permanent financing component, Lender may at its sole discretion require borrower to capitalize a debt service reserve with loan proceeds.

- **Eligible Activity:** Rehabilitation 570.703(b); Payment of Interest 570.703(c); Relocation 570.703(d)(1) & 570.703(d)(2); Clearance, Demolition and Removal 570.703(e); Site Preparation 570.703(f)(1) & 570.703(f)(2); Community Economic Development Projects 570.703(i)(1) & 570.703(i)(2); Debt Service Reserve 570.703(k);
- **National Objective:** Low-to-Moderate Income Benefit- Housing; Elimination of Slum and Blight

Community Development Loans

Local governments may apply for financing to undertake large-scale public facilities and infrastructure projects. These projects may be beyond the annual budget limitations of communities. Community development projects must achieve a CDBG national objective.

Site Preparation Loans: In addition to the criteria listed above, community development site preparation loans will be evaluated against the following criteria:

- **Project Feasibility:** In addition to the financial feasibility of a project, an analysis will also be made on the feasibility of the overall development. The Section 108 loan application must be supported with additional documentation including but not limited to market studies, real estate appraisals, or feasibility studies. All such documentation must be prepared by a third party source that has the qualifications to perform the study, as determined by Lender in its sole discretion. Borrower must submit an operating pro forma clearly setting forth the sources with which the Borrower plans to repay permanent financing. Lender may also review engineering and other types of feasibility studies to properly evaluate the project.
- **Site Suitability:** Lender will also evaluate the project site and location, as follows: a) The project's structural and environmental conditions are satisfactory to lender in its sole discretion, as demonstrated by third party studies and reports including but not limited to: i) Property appraisal ii) Phase I Environmental Site Assessment, iii) Property condition assessment (iv.) If necessary, an operations and maintenance program for removal of asbestos, lead-based paint, radon, PCBs, other toxic waste, and the removal of underground storage tasks. b) The project must have appropriate and adequate zoning, as evidenced by: i) A statement from the community zoning officer that the proposed use of the site is classified as either a legal conforming or a legal non-conforming use under local zoning requirements. d) Proof of ownership and proper title to the property must be evident. e) Borrower must provide a survey of the property from a licensed land surveyor that includes, at a minimum, metes and bounds, a written legal description, easements, encumbrances, rights-of-way, physical features, and utility lines, all in form and content satisfactory to lender.
- **Financial Feasibility:** The project will be examined to determine its viability and assure that the public benefit anticipated from the Section 108 loan will be realized. a) Lender will evaluate current and historic financial statements of both the project sponsor and principals to evaluate completion risk based on sponsor financial capacity. Lender will examine income and expense statements for the proposed tenants relative to industry averages and prudent practice. Lender will also review project costs for reasonableness and feasibility. Finally, lender will analyze past, current, and projected financial data to determine if the job estimates are reasonable and supported by the data. Labor costs shall be evaluated against industry averages. b) The terms and conditions of the Section 108 loan must be appropriate. The interest rate should be set at a rate where available cash flow meets debt obligations with enough remaining cash flow to operate successfully and provide an acceptable debt-coverage ratio. The loan term will be based on the asset being financed. The term will not exceed the economic life of the asset being financed or twenty (20) years (whichever is shorter), as established by the Section 108 Program Guidelines. A longer loan amortization schedule

(resulting in a balloon payment at maturity) may be justified on a case-by-case basis. Each loan application will include a written explanation of this assessment and the reason for requesting the loan terms and conditions.

- **Eligible Activity:** Acquisition 570.703(a); Rehabilitation 570.703(b); Payment of Interest 570.703(c); Relocation 570.703(d)(1) & 570.703(d)(2); Clearance, Demolition and Removal 570.703(e); Site Preparation 570.703(f)(1) & 570.703(f)(2);
- **National Objective:** Low-to-Moderate Income Benefit- Area Benefit; Low-to-Moderate Income Benefit- Limited Clientele; Elimination of Slum and Blight – Spot, Area

Streetscape Loans In addition to the criteria listed above, streetscape loans will be evaluated against the following criteria:

- **Project Feasibility:** In addition to the financial feasibility of a project, an analysis will also be made on the feasibility of the overall development. The Section 108 loan application must be supported with additional documentation including but not limited to feasibility studies or infrastructure/capital needs assessments. All such documentation must be prepared by a third party source that has the qualifications to perform the study, as determined by Lender in its sole discretion. Borrower must submit an operating pro forma clearly setting forth the sources with which the Borrower plans to repay permanent financing. Lender may also review engineering and other types of feasibility studies to properly evaluate the project.
- **Site Suitability:** Lender will also evaluate the project site and location, as follows: a) The project's structural and environmental conditions are satisfactory to lender in its sole discretion, as demonstrated by third party studies and reports including but not limited to: i) Property appraisal ii) Phase I Environmental Site Assessment, iii) Property condition assessment (iv.) If necessary, an operations and maintenance program for removal of asbestos, lead-based paint, radon, PCBs, other toxic waste, and the removal of underground storage tasks. b) The project must have appropriate and adequate zoning, as evidenced by: i) A statement from the community zoning officer that the proposed use of the site is classified as either a legal conforming or a legal non-conforming use under local zoning requirements. d) Proof of ownership and proper title to the property must be evident. e) Borrower must provide a survey of the property from a licensed land surveyor that includes, at a minimum, metes and bounds, a written legal description, easements, encumbrances, rights-of-way, physical features, and utility lines, all in form and content satisfactory to lender.
- **Financial Feasibility:** The project will be examined to determine its viability and assure that the public benefit anticipated from the Section 108 loan will be realized. a) Lender will evaluate current and historic financial statements of both the project sponsor and principals to evaluate completion risk based on sponsor financial capacity. Lender will examine income and expense statements for the proposed tenants relative to industry averages and prudent practice. Lender will also review project costs for reasonableness and feasibility. Finally, lender will analyze past, current, and projected financial data to determine if the job estimates are reasonable and supported by the data. Labor costs shall be evaluated against industry averages. b) The terms and conditions of the Section 108 loan must be appropriate. The interest rate should be set at a rate where available cash flow meets debt obligations with enough remaining cash flow to operate successfully and provide an acceptable debt-coverage ratio. The loan term will be based on the asset being financed. The term will not exceed the economic life of the asset being financed or twenty (20) years (whichever is shorter), as established by the Section 108 Program Guidelines. A longer loan amortization schedule (resulting in a balloon payment at maturity) may be justified on a case-by-case basis. Each loan application will include a written explanation of this assessment and the reason for requesting the loan terms and conditions. Lender may at its sole discretion require borrower to capitalize a debt service reserve with loan proceeds.

- **Eligible Activity:** Acquisition 570.703(a); Rehabilitation 570.703(b); Payment of Interest 570.703(c); Relocation 570.703(d)(1) & 570.703(d)(2); Clearance, Demolition and Removal 570.703(e); Site Preparation 570.703(f)(1) & 570.703(f)(2); Debt Service Reserve 570.703(k)
- **National Objective:** Low-to-Moderate Income Benefit- Area Benefit; Low-to-Moderate Income Benefit- Limited Clientele; Elimination of Slum and Blight – Spot, Area

Public Facility Loans: In addition to the criteria listed above, public facility loans will be evaluated against the following criteria:

- **Project Feasibility:** In addition to the financial feasibility of a project, an analysis will also be made on the feasibility of the overall development. The Section 108 loan application must be supported with additional documentation including but not limited to market/demand studies, real estate appraisals, or feasibility studies evidencing a clear need for the proposed facility. All such documentation must be prepared by a third party source that has the qualifications to perform the study, as determined by Lender in its sole discretion. Borrower must submit an operating pro forma clearly setting forth the sources with which the Borrower plans to repay permanent financing. Lender may also review engineering and other types of feasibility studies to properly evaluate the project.
- **Site Suitability:** Lender will also evaluate the project site and location, as follows: a) The project's structural and environmental conditions are satisfactory to lender in its sole discretion, as demonstrated by third party studies and reports including but not limited to: i) Property appraisal ii) Phase I Environmental Site Assessment, iii) Property condition assessment (iv.) If necessary, an operations and maintenance program for removal of asbestos, lead-based paint, radon, PCBs, other toxic waste, and the removal of underground storage tasks. b) The project must have appropriate and adequate zoning, as evidenced by: i) A statement from the community zoning officer that the proposed use of the site is classified as either a legal conforming or a legal non-conforming use under local zoning requirements. d) Proof of ownership and proper title to the property must be evident. e) Borrower must provide a survey of the property from a licensed land surveyor that includes, at a minimum, metes and bounds, a written legal description, easements, encumbrances, rights-of-way, physical features, and utility lines, all in form and content satisfactory to lender.
- **Financial Feasibility:** The project will be examined to determine its viability and assure that the public benefit anticipated from the Section 108 loan will be realized. a) Lender will evaluate current and historic financial statements of both the project sponsor and principals to evaluate completion risk based on sponsor financial capacity. Lender will examine income and expense statements for the proposed tenants relative to industry averages and prudent practice. Lender will also review project costs for reasonableness and feasibility. Finally, lender will analyze past, current, and projected financial data to determine if the job estimates are reasonable and supported by the data. Labor costs shall be evaluated against industry averages. b) The terms and conditions of the Section 108 loan must be appropriate. The interest rate should be set at a rate where available cash flow meets debt obligations with enough remaining cash flow to operate successfully and provide an acceptable debt-coverage ratio. The loan term will be based on the asset being financed. The term will not exceed the economic life of the asset being financed or twenty (20) years (whichever is shorter), as established by the Section 108 Program Guidelines. A longer loan amortization schedule (resulting in a balloon payment at maturity) may be justified on a case-by-case basis. Each loan application will include a written explanation of this assessment and the reason for requesting the loan terms and conditions. Lender may at its sole discretion require borrower to capitalize a debt service reserve with loan proceeds.
- **Eligible Activity:** Acquisition 570.703(a); Rehabilitation 570.703(b); Payment of Interest 570.703(c); Relocation 570.703(d)(1) & 570.703(d)(2); Clearance, Demolition and Removal

570.703(e); Site Preparation 570.703(f)(1) & 570.703(f)(2); Debt Service Reserve 570.703(k)

- **National Objective:** Low-to-Moderate Income Benefit- Area Benefit; Low-to-Moderate Income Benefit- Limited Clientele; Elimination of Slum and Blight – Spot, Area

Additional Information

Underwriting Experience

Although we will retain qualified consultant support when necessary and appropriate, the State of Indiana has established a strong record of accomplishment in underwriting, closing, and securing repayment of a broad range of loans, equity investments and equity equivalent investments. For example, Indiana Housing & Community Development Authority underwriting and management staff have over 50 years of collective experience underwriting residential construction and permanent loans, home mortgages, and interim as well as permanent loans for the development of commercial and residential as well as community facilities. IHCDA staff are experienced in structuring leveraged financing that provides the critical first and last dollars, while closing financing gaps that facilitate investment by other lenders. Through subordinate (but still prudent) lien and payment position, our loans have Debt-Service Coverage Ratio as low as 1.1 and Loan To Value ratios of up to 100%; of course, we will follow more conservative HUD guidelines in both of these regards for Section 108 financing. In spite of these risks, our delinquency and default rate consistently outperforms comparable market debt.

IHCDA manages a range of investments to support the development of affordable housing, all of which carry the same requirements for underwriting, due diligence, servicing, reporting to investors and asset management as a Section 108-Guaranteed Loan:

- **Single Family Homeownership:** Though we are not a direct originator, IHCDA provides access to low-interest flexible financing for home purchase, downpayment assistance, and homeownership counseling. In 2011, our participating lenders closed $118.7 million in 1,274 loans and allocated 627 Mortgage Credit Certificates (generating almost $14.6 million in Credits on over $67 million in loans). Through June 30 2012, our participating lenders closed 636 loans totaling $61.1 million and allocated 344 Mortgage Credit Certificates leveraging $36.8 million in financing.

- **Rental Housing Tax Credits:** IHCDA is responsible for allocation of Indiana's allotment of Rental Housing Tax Credits. In 2011, IHCDA awarded a total of $14.35 million in annual credits for projects generating 2,424 units, with total development cost of $241.6 million.

- **Tax Credit Exchange Program (TCEP)/Tax Credit Assistance Program (TCAP):** IHCDA manages $235 million in TCEP proceeds and $38 million in TCAP funds to assist projects that were awarded credits in prior years but have been unable to find equity, have been subject to cost increases as a result of the tightening credit market, or both. Through the end of 2010, IHCDA has allocated and closed on funding of the entire amount, to support production of nearly 6,400 units in 92 projects with total development cost in excess of $570 million. These funds are structured as loans, with many of the features set forth in our proposal for Section 108 debt, including below-market fees and interest rates, subordination to financial institution debt, less strict collateral and credit underwriting standards, and longer than standard amortization relative to market debt.

- **Neighborhood Stabilization Program:** IHCDA is the administrator of $83.76 million in Neighborhood Stabilization Program funds allocated through HERA, as well as $8.2 million in NSP funds allocated through Dodd-Frank. We are working with partners throughout the state to effectively leverage those funds with other IHCDA-controlled resources and private funding to both mitigate the effects of foreclosure statewide and engage in comprehensive community development in select areas.

- **USDA Rural Development Section 515 loan program:** IHCDA leverages its resources through strategic partnerships with a range of funders. For example, IHCDA has worked with the US Department of Agriculture to secure an allocation of $2.125 million in USDA 515 funds for renovation, upgrades and ownership transfers on existing Rural Development properties built in the 1960s and 1970s. With a dollar for dollar match for 515 funds from the Indiana Housing and Community Development Fund (the State's housing trust fund, supported by an annual allocation of a portion of the state tax on non-cigarette tobacco), IHCDA is substantially leveraging USDA's investment while diffusing the risk for both entities.

With regard to non-residential real estate, IHCDA is among the partners working to support a community development financial institution serving disadvantaged businesses and communities throughout Indiana. The CDFI, The Community Investment Fund of Indiana, Inc., or CIFI, has to date made $540,000 in direct loans to serve eligible Low Income Targeted Populations. IHCDA staff are providing primary underwriting and deal structuring support. CIFI's board members and partners come from a broad range of Indiana communities, and the organization will be a critical partner in identifying and facilitating future Section 108 investments; moreover, CIFI will offer predevelopment financing and seed capital for projects and businesses serving disadvantaged communities to help them advance to a state of readiness for Section 108 investments and leveraged debt.

In addition, IHCDA staff have approximately 30 years of collective experience underwriting construction and permanent financing for non-residential loans and investments, including new construction and rehab projects for mixed use retail/residential, traditional retail and office properties, historic community landmarks, community facilities such as health clinics, recreational facilities and assisted living/nursing care facilities, land development efforts, and industrial parks.

Planned Lending Capacity and Repayment

State of Indiana anticipates making $140,000,000 in loans over the next five years. The State will repay loan funds that it advances over a twenty year term with a twenty year amortization. The primary source for repayment will be project revenue from third party loans to units of local government. The second source of repayment will be security on those loans. The third source of repayment will be the State's annual allocation as pledged in this application. Federal statute requires that the State of Indiana pledge its CDBG allocation as a source of repayment.

Pursuant to 570.703(g), the State will utilize Section 108 funds where appropriate to cover the cost of Payment of issuance, underwriting, servicing, trust administration and other costs associated with private sector financing of debt service obligations.

Application Process

A. Project Proposal

Eligible public entities must submit a project proposal as a requirement for the Indiana Section 108 Loan Program. The proposal will be submitted using the Section 108 Loan

Proposal Form.

B. Site Visit
A site visit to discuss the potential project and the need for Section 108 loan funds will be required. Eligible public entities are encouraged to request a site visit with OCRA/IHCDA staff as early in the process as possible. Attendees must include the eligible public entity, the for-profit business, non-profit developer, for-profit developer, and any other parties to the Section 108 Loan.

C. Threshold Review
OCRA/IHCDA staff will review each application submitted for compliance with the state and federal threshold requirements for a Section 108 loan, including proper design to meet eligibility and national objective requirements and demonstration of non-replacement of federal funding.

D. Final Application
Once the public entity has held the public hearing and published the proposed application the public entity must consider any comments received and if it deems appropriate, modify the proposed application. The final application must be made available to the public.

E. Final Review and Approval
The State of Indiana will review the final application submitted for a Section 108 loan. OCRA (in consultation with IHCDA) may disapprove or reduce the amount of the loan when it determines that the loan constitutes an unacceptable financial risk. OCRA reserves the right to not approve an application based on any other combination of factors and will notify the public entity in writing that the loan application has been approved, reduced, or disapproved. If the request is reduced or disapproved, the public entity will be informed of the specific reasons for reduction or disapproval.

If the request is approved, OCRA will request from HUD a final determination regarding the eligibility and national objective of the proposed activity. OCRA will allocate funds from its Section 108 loan fund for all approved projects.

Information for Local Government Borrowers

All additional information related to this application for Section 108 guaranteed loan funds, including local government application guidelines, is available at www.in.gov/ocra.

For more information, please visit www.in.gov/ocra or contact the Indiana Office of Community and Rural Affairs at (800) 824-2476.

U.S. Department of Housing
and Urban Development
Office of Community Planning
and Development

Pursuant to 24 CFR §570.704(b)(9), the SECTION 108 LOAN GUARANTEE State Certifications Related to Nonentitlement Public Entities

State of ______________________, with regard to the Section 108 Loan guarantee application submitted by the ____________________ (Nonentitlement Public Entity), certifies that:

i. It agrees to make the pledge of grants required under 24 CFR §570.705(b)(2).
ii. It possesses the legal authority to make such pledge.
iii. At least 70 percent of the aggregate use of the CDBG grant funds received by the State, guaranteed loan funds, and Unconditional pledge of Program Income during the one, two, or three consecutive years specified by the State for its CDBG program will be for activities that benefit low and moderate income persons.
iv. It agrees to assume the responsibilities described in 24 CFR §570.710.

____
Signature

____
Name

____
Title

____
Date (mm/dd/yyyy)

Consultation and Participation

Summary of Stakeholder Consultation and Citizen Participation Processes

Public Consultation

Public consultation for the development of the State of Indiana 2013 Action Plan included focus groups, public meetings and a comprehensive stakeholder survey. This chapter summarizes results of the stakeholder survey; community development priorities identified in public meetings; and public hearings sponsored by OCRA and IHCDA.

Findings

Key findings from consultation with the public about housing, homeless and community development needs include:

- The recession, foreclosure crisis and high unemployment have increased demand for affordable housing and supportive services;
- A growing share of the homeless population consists of families with children, most of whom are homeless for the first time;
- Stakeholders' top five most urgent housing needs are:
  - Housing for persons at 30 percent of AMI or less;
  - Emergency shelter for homeless/homeless shelter;
  - Housing rehabilitation for low income homeowners;
  - Housing for seniors; and
  - Housing for persons with serious mental illness.
- From the perspective of stakeholders, the five most urgent community development needs are:
  - Public transit for all;
  - Job training programs;
  - Water and sewer infrastructure;
  - Sidewalks; and
  - Stormwater infrastructure.
- A lack of accessible housing for persons with disabilities and severe mental illness that is affordable to persons living on SSI/SSDI or below 30 percent AMI is a significant problem in many communities across the state.
- Stakeholders shared a number of barriers (in addition to funding) that make it difficult to address unmet housing, homeless and community development needs. These include a lack of local capacity; difficulties developing affordable housing; lack of community awareness and support; NIMBYism and housing discrimination; need for housing rehabilitation and

maintenance; regulatory barriers; state tax sale regulations; and decreased program funding.

Public Hearings

On April 25, 2013 two public hearings were held to receive comments on the Draft 2013 Action Plan. The hearings were held in six locations throughout the state at 2 p.m. and again at 5:30 p.m. The hearings had 28 attendees altogether (excluding agency representatives).

The hearings included a presentation that provided background information about the Action Plan process and requirements; discussed program changes for 2013; and presented the proposal program allocation for the program year.

Many participants provided verbal comments about the 2013 Action Plan; some followed with written comments, which are appended to Action Plan.

Verbal comments included:

- Indiana lacks accessible housing for persons with disabilities. The state should make visitability and accessibility in new construction a priority.
- The Central Indiana Fair Housing Center recently reported findings on housing discrimination testing. The testing found very high rates of differential treatment in rental transactions for African American and Hispanic residents. Attendees called for additional testing statewide, emphasizing that testing is a “critical ingredient” in mitigating housing discrimination.
- Statistics in the CAPER were questioned, as they show that only 5 percent of HOME beneficiaries were African Americans.
- A shelter which assists victims of domestic violence in rural Indiana expressed concern about the State’s rapid rehousing priority in ESG funding. The primary need for their clients is transitional housing, safe from the victims’ perpetrators.

Survey Participant Characteristics

A total of 332 stakeholders participated in the online stakeholder survey. Participants represented more than 40 types of industries and organizations offering services at the municipal, county, regional and statewide level.

Industry/organization. Figure 1 presents the types of industries and organizations represented by survey respondents. The greatest proportions of respondents provide services to low income residents and persons with disabilities. Respondents represent the public, private and nonprofit sectors.

Figure 1.
Type of Industry/Organization

Industsy/Organization Type	Percent	Industry/Organization Type	Percent
Services for low income residents	26%	Services for immigrants	5%
Services for persons with disabilities	26%	Other	4%
Government	23%	Business owner/manager	4%
Local government	22%	Landlord/tenant services	4%
Homeless services	22%	Public housing authority	3%
Economic development	17%	Services for refugees	3%
Services for seniors	17%	Services for businesses	3%
Affordable housing advocacy	15%	Transit provider	3%
Affordable housing development	14%	Domestic violence shelter/services	2%
Services for veterans	13%	Market rate housing development	2%
Services for persons with drug or alcohol addictions	12%	Foundation	2%
Own rental property	11%	Mental health services	2%
Property management	11%	Sales	2%
Affordable housing provision	9%	Independent living services/advocacy	1%
Services for persons with HIV/AIDS	9%	Criminal justice	1%
Education	9%	Health care	1%
Fair housing	9%	Lending	1%
Food pantry	8%	Services for youth	1%
Regional planning	8%	Insurance	1%
Homeownership counseling or services	7%	Residential appraisals	0%
Land use planning	5%		

Note: n=332. Numbers add to greater than 100 percent due to multiple response.

Source: BBC Research & Consulting 2013 Action Plan Stakeholder Survey.

Housing & Homeless Needs

Stakeholders responded to a series of questions regarding housing and homeless needs in their community, including how needs may have changes in the past two to three years.

Recent changes in housing needs. Stakeholders shared their perceptions of how housing needs have changed in the past two to three years in the communities they serve. Only a few stakeholders (less than 10%) did not think housing needs have changed. Among those who shared how housing needs have changed, several themes emerged:

- Impact of foreclosures on the housing market, including upward pressure on rental housing costs and increased number of vacant homes in the community;
- Loss of low income housing units due to floods or other natural disasters;
- Increased demand for low income housing;
- Increased need for rental housing, exacerbated by foreclosures;
- Housing stock is becoming increasingly distressed as landlords and homeowners delay repairs;
- Increased need for affordable accessible housing for persons with disabilities;
- Increased need for senior housing options, including home modification programs, affordable senior housing and assisted living;

- Need for affordable housing for larger families;
- Recent fair housing testing found incidences of discrimination against African Americans and persons with disabilities;
- Increased need for housing with supportive services for persons with disabilities and severe mental illness;
- Increased homeless population, including veterans and families with children; and
- Increased demand for assistance to help families keep their home.

Recent changes in homeless needs. For approximately 20 percent of stakeholders, homeless needs in their community have not changed in the last two to three years. For the majority of stakeholders, the recession, increasing unemployment and foreclosures have increased the number of individuals and families experiencing homelessness. Recent changes in homeless needs observed by stakeholders include:

- Increased numbers of homeless families and these tend to be "newly" homeless;
- Increased number of homeless under the age of 30 and increased number of young adults couch surfing;
- Increased number of women needing shelter—some communities only have shelter beds for men;
- Increase in the number of families sharing housing, "doubling up";
- Shelters are always full, some communities need additional shelter beds;
- Increased need for transitional housing units;
- Reductions in funding as need for shelter, housing and services increases;
- Rising need for temporary housing and services to help families get back on their feet;
- Not all shelters are accessible to persons with physical disabilities; and
- Services for homeless veterans have improved.

Greatest unmet housing needs. Figure 5 presents the proportion of stakeholders who selected particular needs as one of three top unmet housing needs in their area. The greatest proportion of stakeholders (26%) selected housing for seniors as a top unmet need, followed by housing rehabilitation for low income homeowners and homeownership opportunities for low income residents.

Figure 5.
Greatest Unmet Housing Needs

Note:

n=293 stakeholders. Numbers add to greater than 100 percent due to multiple response.

Source:

BBC Research & Consulting 2013 Action Plan Stakeholder Survey.

Unmet housing needs	Percent
Housing for seniors	26%
Housing rehabilitation for low income homeowners	25%
Homeownership opportunities for low income residents	24%
Emergency shelter for homeless/homeless shelter	22%
Housing rehabilitation for moderate income homeowners	21%
Housing rehabilitation for low income renters	21%
Housing for persons at 30% AMI or less	19%
Homeownership opportunities for moderate income residents	19%
Housing for homeless families	19%
Housing for persons with serious mental illness	18%
Housing for persons with physical disabilities	16%
Housing for adults with criminal histories (felonies)	14%
Housing for chronic homeless	9%
Housing for homeless women	9%
Other	9%
Housing for persons with cognitive disabilities	8%
Housing for persons at 60% AMI or less	7%
Housing for persons at 80% AMI or less	7%
Housing rehabilitation for moderate income renters	6%
Housing for homeless veterans	5%
Housing for youth transitioning out of foster care	4%
Housing for homeless men	3%
Housing for persons with HIV/AIDS	1%

Ranking of unmet housing needs. Stakeholders also ranked housing needs according to urgency; Figure 6 presents the results of the ranking. The most urgent unmet housing needs as ranked by stakeholders are:

- Housing for persons at 30 percent of AMI or less;
- Emergency shelter for homeless/homeless;
- Housing rehabilitation for low income homeowners;
- Housing for seniors; and
- Housing for persons with serious mental illness.

Unmet housing needs are color-coded based on their ranking in the #1 Most Urgent Unmet Housing Need column. For example, those with a light red shading were most commonly ranked at "Most Urgent" but also were included by some respondents as "#2 or #3 Most Urgent."

Figure 6.
Ranking the Top Three Most Urgent Housing Needs

Ranking	#1 Most Urgent	Ranking	#2 Most Urgent	Ranking	#3 Most Urgent
1	Housing for persons at 30% AMI or less	1	Housing for seniors	1	Housing for seniors
2	Emergency shelter for homeless/homeless shelter	2	Housing rehabilitation for low income homeowners	2	Homeownership opportunities for low income residents
3	Housing rehabilitation for low income homeowners	3	Housing rehabilitation for low income renters	3	Housing rehabilitation for low income renters
4	Housing for seniors	4	Housing for homeless families	4	Housing for persons with serious mental illness
5	Housing for persons with serious mental illness	5	Homeownership opportunities for low income residents	5	Emergency shelter for homeless/homeless shelter
6	Housing rehabiliation for moderate income homeowners	6	Homeownership opportunities for moderate income residents	6	Housing for homeless families
7	Housing for persons with physical disabilities	7	Housing for adults with criminal histories (felonies)	7	Housing rehabiliation for moderate income homeowners
8	Homeownership opportunities for moderate income residents	8	Housing for homeless women	8	Housing rehabilitation for low income homeowners
9	Housing for adults with criminal histories (felonies)	9	Housing for persons with serious mental illness	9	Housing for chronic homeless
10	Housing for homeless families	10	Emergency shelter for homeless/homeless shelter	10	Homeownership opportunities for moderate income residents
11	Homeownership opportunities for low income residents	11	Housing for persons at 30% AMI or less	11	Housing for adults with criminal histories (felonies)
12	Housing for homeless women	12	Housing for chronic homeless	12	Housing for persons at 30% AMI or less
13	Housing rehabilitation for low income renters	13	Housing for persons with cognitive disabilities	13	housing for persons at 80% AMI or less
14	Housing for chronic homeless	14	Housing for persons at 60% AMI or less	14	Housing for persons with physical disabilities
15	Housing for homeless veterans	15	Housing for persons with physical disabilities	15	Housing for persons with cognitive disabilities
16	Housing for persons at 60% AMI or less	16	Housing for youth transitioning out of foster care	16	Housing for homeless women
17	housing for persons at 80% AMI or less	17	Housing for homeless men	17	Housing for persons at 60% AMI or less
18	Housing rehabilitation for moderate income renters	18	housing for persons at 80% AMI or less	18	Housing for homeless veterans
19	Housing for persons with cognitive disabilities	19	Housing rehabilitation for moderate income homeowners	19	Housing for youth transitioning out of foster care
20	Housing for people with disabilities	20	Emergency shelter for teens	20	Housing for homeless men
21	Housing for homeless men	21	Housing for homeless veterans	21	Housing for people with disabilities
22	Housing for youth transitioning out of foster care	22	Housing for low income renters		
		23	Housing for people with disabilities		

Note: n=269 stakeholders. Unmet housing needs are color-coded based on their ranking in the #1 Most Urgent column.

Source: BBC Research & Consulting 2013 Action Plan Stakeholder Survey.

Housing for Persons with Disabilities

Stakeholders responded to a series of questions about the availability of and type of housing needed in their community for persons with physical or cognitive disabilities and severe mental illnesses.

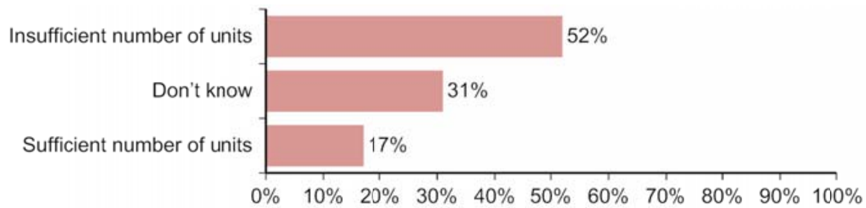
Housing for persons with physical disabilities. With respect to housing units accessible to persons with physical disabilities, stakeholders responded to questions about unit availability and quality as well as the types of units needed in their community.

Availability of accessible units. Less than one in five stakeholders (17%) report that a sufficient number of units for persons with physical disabilities are available in their community, as shown in Figure 7. The majority believe there is an insufficient number of units.

Figure 7.
Availability of Housing for Persons with Physical Disabilities

Note:
n=207.

Source:
BBC Research & Consulting 2013 Action Plan Stakeholder Survey.

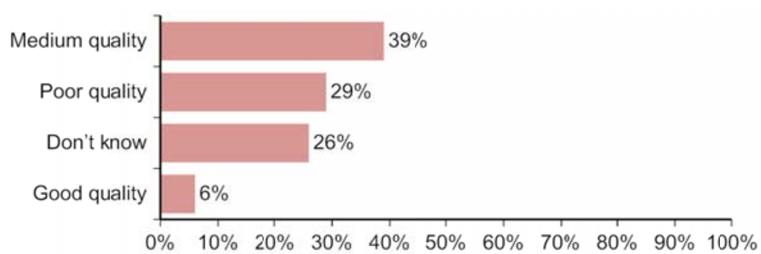


Quality of accessible units. With respect to the quality of units accessible to persons with physical disabilities, only one in twenty stakeholders considered these units to be of good quality. About 30 percent rated accessible unit quality to be poor and one in four did not know how to rate the quality, as shown in Figure 8.

Figure 8.
Quality of Housing Accessible to Persons with Physical Disabilities

Note:
n=207.

Source:
BBC Research & Consulting 2013 Action Plan Stakeholder Survey.



With respect to a lack of quality accessible units, stakeholders' comments included:

- Accessibility modification challenges are exacerbated in communities with old (pre-1960) housing stock;
- In some communities, accessible units are found in seniors-only buildings;

- Many units that are affordable to persons living on SSI are not accessible and are not located in safe areas or areas with amenities (e.g., grocery stores, good schools, good transit access); and
- Regardless of accessibility, affordable rental units are often in poor condition.

Type of housing needed. Those respondents who reported an insufficient number of units available in their community for persons with physical disabilities shared the types of housing units they believe are most needed. Stakeholders' comments about the types of housing needed generally fell into the following categories:

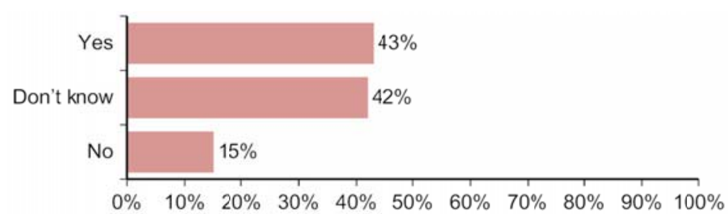
- Accessible housing affordable to persons living on SSI;
- Accessible, affordable multi-bedroom units needed for persons with disabilities living with family;
- Accessible, affordable housing that is not senior housing;
- Tenant based rental assistance is needed;
- While landlords are willing to make modifications, the tenant cannot afford the cost;
- Need for single family homes and townhomes that are accessible and visitable; and
- Accessible housing needs to be connected to or near public transit.

Challenges accessing housing. As shown in Figure 9, about two in five stakeholders believe that persons with physical disabilities encounter challenges accessing housing in their area. About the same proportion of stakeholders did not know if persons with physical disabilities have challenges accessing housing.

Figure 9.
Challenges Accessing Housing for Persons with Physical Disabilities

Note:
n=198.

Source:
BBC Research & Consulting 2013 Action Plan
Stakeholder Survey.



With respect to the challenges persons with physical disabilities face when trying to access housing, stakeholders' comments focused largely on the lack of accessible and affordable units in their community. In addition, stakeholders named the following challenges:

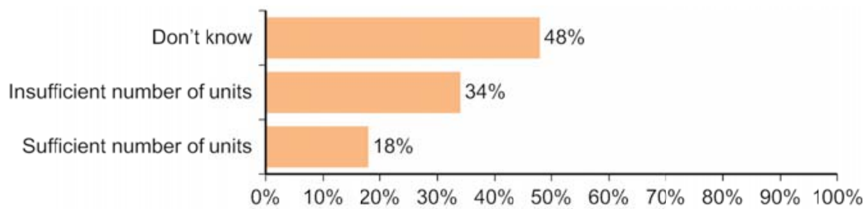
- A lack of public transportation limits where persons with disabilities can live;
- Sidewalks and curbs are not accessible to persons using wheelchairs;
- Many building entrances are not accessible, including some buildings built post-2000;

- Long waitlists for accessible and affordable housing, particularly for those with incomes less than 30 percent of AMI; and
- Few, if any, accessible units have more than one bedroom.

Housing for persons with cognitive disabilities. As with housing for persons with physical disabilities, stakeholders responded to a series of questions about the accessibility and quality of housing for persons with cognitive disabilities, the types of housing needed and challenges faced by this population in securing housing.

Availability of units. Compared to availability of units for persons with physical disabilities, about the same proportion of stakeholders (18%) believe there are a sufficient number of units available to persons with cognitive disabilities. A much greater proportion of respondents (52%) did not know if a sufficient number of units are available.

Figure 10.
Availability of Units Accessible to Persons with Cognitive Disabilities

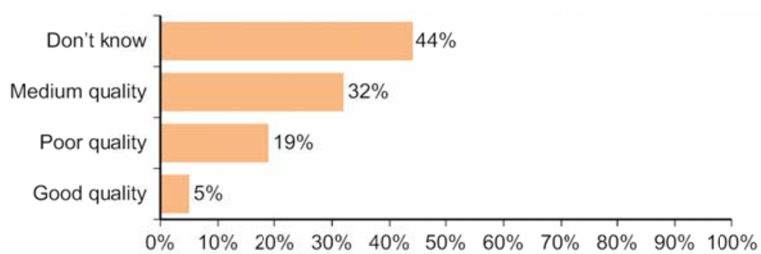


Note:
n=196.

Source:
BBC Research & Consulting 2013 Action Plan Stakeholder Survey.

Quality of available units. The greatest proportion of stakeholders (44%) did not know how to characterize the quality of housing units accessible to persons with cognitive disabilities. Of those rating the quality, only 5 percent rated the quality as good.

Figure 11.
Quality of Housing Available to Persons with Cognitive Disabilities



Note:
n=194.

Source:
BBC Research & Consulting 2013 Action Plan Stakeholder Survey.

With respect to the quality of housing available to persons with cognitive disabilities, the primary concern among stakeholders is that these individuals rely on SSI/SSDI and are very low income; therefore, the quality of the units they can afford to rent is often poor. Other comments about the quality of housing include:

- Group homes being located in undesirable areas with limited access to grocery stores, medical services or transportation;

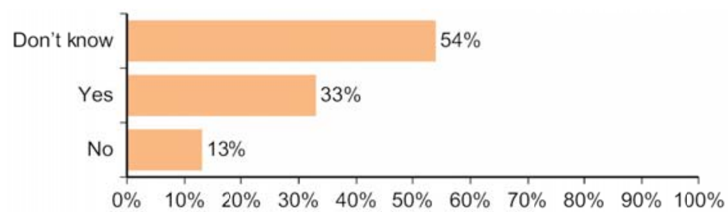
- Because alternative living arrangements are either not available or affordable, people with cognitive disabilities may be forced to live in group homes, nursing homes or other institutions when they would prefer another living arrangement; and
- A desire among stakeholders to see housing opportunities for persons with cognitive disabilities developed to be more integrated into the larger community.

Type of housing units/arrangements needed. Stakeholders suggested several types of housing units or living arrangements that are needed for housing persons with cognitive disabilities:

- Affordable and accessible units, particularly units affordable to individuals living on SSI/SSDI or on incomes below 30 percent of AMI;
- More group home living arrangements;
- Shared housing arrangements (not formal group homes) such as three individuals with cognitive disabilities and live-in supportive/supervisory staff;
- Living arrangements that are integrated into the community; and
- Living arrangements that promote independent living to the greatest extent possible, while also providing some degree of supportive services/supervision.

Challenges accessing housing. One in three stakeholders report that they believe persons with cognitive disabilities encounter challenges in accessing housing. The greatest proportion of stakeholders (52%) did not know if persons with cognitive disabilities have challenges accessing housing.

Figure 12.
Challenges Accessing Housing Encountered by Persons with Cognitive Disabilities



Note:
n=200.

Source:
BBC Research & Consulting 2013 Action Plan
Stakeholder Survey.

Those stakeholders who believe persons with cognitive disabilities encounter challenges described their perceptions of the challenges faced. These include:

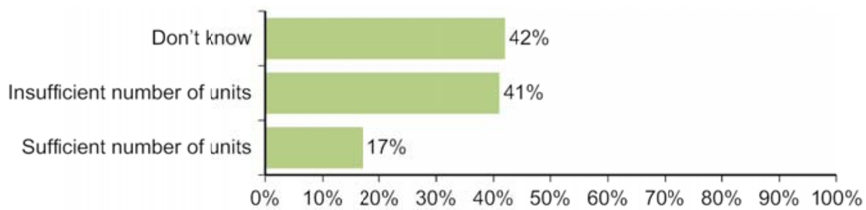
- Limited availability of affordable units to rent overall, regardless of quality—in many cases, the units persons with cognitive disabilities can afford to rent are substandard and located in undesirable neighborhoods;
- Discriminatory practices by landlords (e.g., refusal to rent);
- Zoning limits placement of group homes to only certain areas or restricts the number of unrelated persons able to live together;

- Insufficient opportunities for non-group home or non-institutional living arrangements; and
- Difficulties associated with having a sufficient number of housemates to secure caregiver or other supportive benefits.

Housing for persons with severe mental illness. Stakeholders gauged the availability and quality of housing accessible to persons with severe mental illness and the types of housing/living arrangements needed by this population.

Availability of units. As with persons with physical or cognitive disabilities, about the same proportion of stakeholders (17%) believe the availability of housing units accessible to persons with severe mental illness are sufficient.

Figure 13.
Availability of Housing Accessible to Persons with Severe Mental Illness

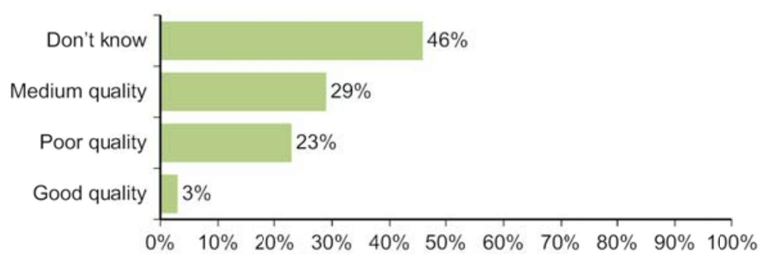


Note:
n=196.

Source:
BBC Research & Consulting 2013 Action Plan Stakeholder Survey.

Quality of units. Stakeholders' perceptions of the quality of housing accessible to persons with severe mental illness generally fell into the "medium" and "poor" categories, but the greatest proportion of respondents (46%) did not know how to assess the quality.

Figure 14.
Quality of Units Accessible to Persons with Severe Mental Illness



Note:
n=195.

Source:
BBC Research & Consulting 2013 Action Plan
Stakeholder Survey.

Since many persons with severe mental illness live on fixed disability income, stakeholders' perceive the types of units this population can afford to rent (without additional subsidy) tends to be older, in need of rehabilitation, and often located in higher crime areas and away from community mental health services. Stakeholders also discussed the need for housing for persons with severe mental illness with supportive services and the need for increased attention and funding for mental health services.

Type of housing units/arrangements needed. Stakeholders shared the types of housing needed most for persons with severe mental illness in their community. By far, the greatest number of responses stressed the need for housing that is affordable to someone living on SSI/SSDI that is located in safe areas with access to social service and psychiatric supports. Other needs identified include:

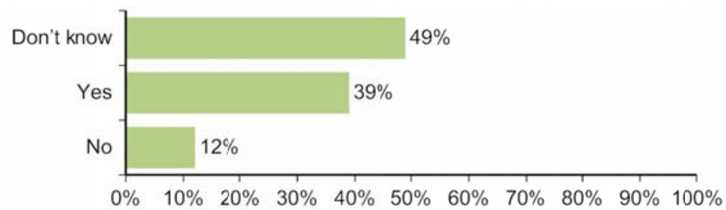
- Group homes with supervision;
- Permanent supportive housing integrated into the community;
- Transitional housing; and
- Private landlords willing to rent to this population.

Challenges in accessing housing. As shown in Figure 15, about half of stakeholders do not know if persons with severe mental illness have challenges accessing housing, and 39 percent believe they do have challenges.

Figure 15.
Challenges Accessing Housing for Persons with Severe Mental Illness

Note:
n=196.

Source:
BBC Research & Consulting 2013 Action Plan
Stakeholder Survey.



From the perspective of stakeholders, persons with severe mental illness face numerous challenges in accessing safe, quality housing they can afford. These include:

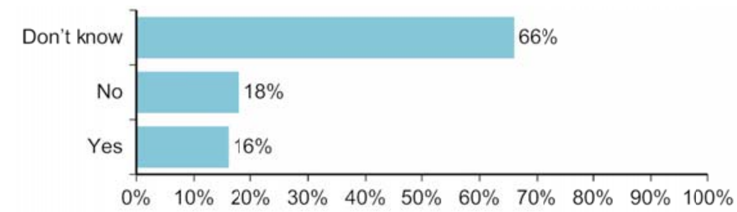
- Lack of safe, quality units affordable to those on SSI/SSDI or at 30 percent or below AMI;
- NIMBYism and zoning restrictions on group homes;
- Discrimination or unwillingness to lease by private landlords;
- Lack of sufficient community mental health services;
- Lack of housing with supportive services;
- Poor credit or rental histories; and
- Lack of affordable housing near transit and services.

Challenges in accessing housing for persons with HIV/AIDS. As shown in Figure 16, the majority of stakeholders (66%) do not know if persons with HIV/AIDS encounter challenges accessing housing.

Figure 16.
Challenges Accessing Housing for Persons with HIV/AIDS

Note:
n=199.

Source:
BBC Research & Consulting 2013 Action Plan
Stakeholder Survey.



Among stakeholders who believe persons with HIV/AIDS face challenges securing housing, two themes emerged:

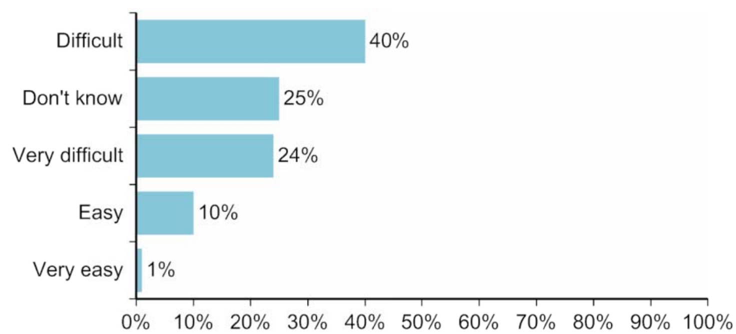
- A lack of units affordable to persons living on 30 percent or less of AMI; and
- Discrimination in the private rental market due to the stigma of HIV/AIDS.

Ease of accessing loan and grant programs. Overall, the majority of stakeholders (64%) believe it is difficult or very difficult for persons with disabilities to get information about loan or grant programs to make accessibility improvements to their homes.

Figure 17.
Ease of Accessing Information about Loan and Grant Programs to Make Accessibility Improvements to their Homes

Note:
n=203.

Source:
BBC Research & Consulting 2013 Action Plan Stakeholder Survey.

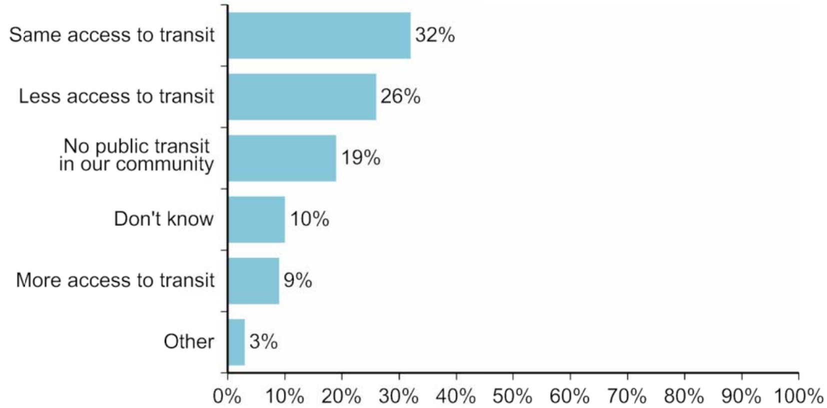


Ease of accessing public transit. Figure 18 presents stakeholders' opinions of the ease with which persons with disabilities can access public transit compared to the general population. About one in three believe that persons with disabilities have the same access as the general population, and one in ten believe persons with disabilities have more access to transit. For one in five stakeholders, public transit is not available in their community.

Figure 19.
Ease of Accessing Public Transit for Persons with Disabilities Compared to the Rest of the Community

Note:
n=201.

Source:
BBC Research & Consulting 2013 Action Plan Stakeholder Survey.



Community Development Needs

In the survey, stakeholders responded to a series of questions regarding community development needs. In public meetings held in seven communities across the state, participants identified and prioritized community development needs.

Greatest unmet community development needs. Stakeholders identified the top three greatest unmet community development needs in their area. As shown in Figure 20, more than two in five stakeholders identified public transportation for all as an unmet community development need, followed by job training programs, water and sewer infrastructure and sidewalks.

Figure 20.
Greatest Community Development Needs

Unmet community development needs	Percent
Public transit for all	43%
Job training programs	36%
Water and sewer infrastructure	31%
Sidewalks	29%
Stormwater infrastructure	22%
Infrastructure for Internet access	15%
Technical assistance—Identifying loan/grant opportunities	14%
Youth center	13%
Accessibility (ADA) improvements to community amenities (e.g., parks, trails)	12%
Public transportation for persons with disabilities	11%
Public safety support (e.g., fire stations, fire trucks)	10%
Accessibility (ADA) improvements to public buildings	10%
Technical assistance—Business plan development, entrepreneurship training	7%
Public transportation for seniors	6%
Technical assistance—Energy efficiency and renewable energy services	6%
Street lighting	5%
Senior center	5%
Flood plain mitigation	5%
Other	5%
Technical assistance—Business skills development (e.g., accounting, software training)	4%
Street repair/maintenance	3%
Technical assistance—Market research and competitive intelligence	2%
Local and regional planning/Liveable communities planning	2%
Technical assistance—Water conservation services	1%
Employment/jobs/economic development	1%
Technical assistance—Internet and social media strategy/search engine	1%
Technical assistance—other	1%

Note: n=290 stakeholders. Numbers add to greater than 100 percent due to multiple response

Source: BBC Research & Consulting 2013 Action Plan Stakeholder Survey.

Ranking of unmet community development needs. As with unmet housing needs, stakeholders identified and ranked their top three unmet community development needs, in order of priority. The most urgent unmet community development needs as ranked by stakeholders are:

- Public transit for all;
- Job training programs;
- Water and sewer infrastructure;
- Sidewalks; and
- Stormwater infrastructure.

These are consistent with the top three priority community development needs presented in Figure 20.

Unmet community development needs are color-coded based on their ranking in the #1 Most Urgent Unmet Community Development Need column.

Figure 21.
Ranking the Top Three Most Urgent Community Development Needs

Ranking	#1 Most Urgent	Ranking	#2 Most Urgent	Ranking	#3 Most Urgent
1	Public transit for all	1	Public transit for all	1	Sidewalks
2	Job training programs	2	Job training programs	2	Job training programs
3	Water and sewer infrastructure	3	Stormwater infrastructure	3	Infrastructure for Internet access
4	Sidewalks	4	Sidewalks	4	Stormwater infrastructure
5	Stormwater infrastructure	5	Water and sewer infrastructure	5	Technical assistance—Identifying loan/grant opportunities
6	Public safety support (e.g., fire stations, fire trucks)	6	Youth center	6	Water and sewer infrastructure
7	Youth center	7	Technical assistance—Identifying loan/grant opportunities	7	Youth center
8	Accessibility (ADA) improvements to public buildings	8	Public safety support (e.g., fire stations, fire trucks)	8	Accessibility (ADA) improvements to community amenities (e.g., parks, trails)
9	Infrastructure for Internet access	9	Technical assistance—Business plan development, entrepreneurship training	9	Public transit for all
10	Technical assistance—Identifying loan/grant opportunities	10	Accessibility (ADA) improvements to community amenities (e.g., parks, trails)	10	Technical assistance—Energy efficiency and renewable energy services
11	Accessibility (ADA) improvements to community amenities (e.g., parks, trails)	11	Accessibility (ADA) improvements to public buildings	11	Accessibility (ADA) improvements to public buildings
12	Public transportation for persons with disabilities	12	Infrastructure for Internet access	12	Street lighting
13	Flood plain mitigation	13	Flood plain mitigation	13	Public safety support (e.g., fire stations, fire trucks)
14	Senior center	14	Public transportation for seniors	14	Technical assistance—Business plan development, entrepreneurship training
15	Public transportation for seniors	15	Senior center	15	Technical assistance—Business skills development (e.g., accounting, software training)
16	Technical assistance—Business skills development (e.g., accounting, software training)	16	Technical assistance—Energy efficiency and renewable energy services	16	Public transportation for persons with disabilities
17	Employment/jobs/economic development	17	Technical assistance—Business skills development (e.g., accounting, software training)	17	Senior center
18	Technical assistance—Energy efficiency and renewable energy services	18	Infrastructure	18	Flood plain mitigation
19	Street repair/maintenance	19	Technical assistance	19	Public transportation for seniors
20	Other	20	Other	20	Street repair/maintenance
				21	Technical assistance
				22	Technical assistance—Market research and competitive intelligence
				23	Other

Note: n=272 stakeholders. Unmet community development needs are color-coded based on their ranking in the #1 Most Urgent column.

Source: BBC Research & Consulting 2013 Action Plan Stakeholder Survey.

Community development priorities—public meetings. In a series of public meetings held in seven communities—Columbia City, Francisville, Green Castle, Huntingburg, Kokomo, Rushville and Scottsburg—participants identified and ranked community development priorities. Details for each individual community are found in an appendix to this document. In general, each community prioritized infrastructure investments, such as upgrading utilities, water and sewer systems, streets and sidewalks. Several communities prioritized quality of life investments in recreation facilities, trails, downtown revitalization, code enforcement, and education. Investments in attracting employers and jobs include broadband service, workforce training, commercial and industrial growth, affordable child care and public transportation. Planning services, such as comprehensive plans, downtown plans and regional planning were a priority in several communities. Drainage and flood plain control were a priority in a few communities.

Barriers to Addressing Needs

Stakeholders had the opportunity to share their perceptions of barriers to addressing housing and community development needs.

Greatest barriers, excluding funding. Overall, 220 stakeholders commented on the greatest barriers to meeting community development and housing needs (excluding additional funding). Several themes emerged from the comments.

Lack of local capacity. Many stakeholders referenced a lack of capacity among local nonprofit organizations and local government staff and officials to proactively and effectively address low income housing needs in their community. Examples of lack of capacity include inability to effectively coordinate, challenges applying for state and federal grant programs, and a lack of local government planning resources. One stakeholder mentioned that not all communities have access to the HMIS system, making it difficult to maintain continuity in services. Some stakeholders requested technical assistance for developing affordable housing, such as navigating the tax credit program, working with developers and HUD requirements.

Challenges developing affordable housing. A number of stakeholders from rural communities cited a lack of developers interested in or knowledgeable about developing affordable housing. Others noted that the timing for state and federal programs for developing affordable housing are mismatched, causing problems in getting projects developed. Several noted delays in funding commitments and receipt of funds results in increased costs and the development of fewer affordable units, particularly those targeted for less than 30 percent of AMI.

Accessibility. Many stakeholders raised different concerns about accessibility of housing and community amenities to persons with disabilities. One of the primary concerns was a lack of affordable, accessible housing that is also near public transportation and services. Of particular concern was the linkage between accessible housing and housing that is affordable to someone living on SSI/SSDI or below 30 percent AMI. Several stakeholders expressed the desire for communities to adopt visitability policies for new home construction.

Lack of community awareness and support. Many stakeholders described a lack of knowledge and support from community members—and often, elected officials—to address the needs of homeless and very low income residents.

NIMBY. Several stakeholders discussed barriers to developing housing for low income residents, seniors, and residents with disabilities or severe mental illness due to NIMBY opposition.

Discrimination. Several stakeholders cited examples of discriminatory housing practices by private landlords against persons with disabilities or severe mental illness. Some encouraged a more proactive approach to identifying discriminatory behavior than the current reliance on victim originated complaints. Others believe education (for landlords and tenants) is needed.

Home maintenance and rehabilitation. Some stakeholders expressed the need for homeowners to properly maintain their properties. Others were concerned about the impact of absentee landlords on the quality of housing in the community. Several stakeholders would like to develop loan programs for energy efficiency improvements and other health and safety improvements for low income homeowners. There is also a need for rehabilitating vacant properties. For communities with rehabilitation programs in place, some encounter challenges in finding qualified contractors willing to complete the paperwork required for these projects.

Regulatory barriers. Although stakeholders did not necessarily cite specific examples, several considered "red tape," "paperwork," "artificial bureaucratic barriers" and "unrealistic programmatic administration requirements" to be challenges to obtaining funding and getting projects completed.

State tax sale rules. Several stakeholders discussed the challenges associated with the state's regulations for the sale of properties due to unpaid taxes. These stakeholders suggest that the long process (two to three years) and eventual auction prevents communities from acting quickly to prevent blight. They suggested the need for legislative change to allow the community to quickly purchase the property, make necessary improvements, and use the property for affordable housing, perhaps through a sweat-equity style program.

Local zoning barriers and public practices. Several stakeholders named zoning and land use practices as a barrier to the provision of affordable housing in their community, including one example of a moratorium on multifamily development.

Employment and job training. A barrier raised by some stakeholders is the lack of job training accessible to residents of rural communities. While job training programs may exist, the residents to need the service the most may not be able to access these programs due to a lack of transportation. Other stakeholders focused on the need for more employment opportunities in their community.

Barriers created by the State of Indiana. Stakeholders discussed their perceptions of barriers created by the State of Indiana to meeting local housing and community development needs. Nearly 200 stakeholders offered their opinion, including 43 stakeholders (22%) who did not think the State creates any barriers. The majority of stakeholders shared examples of barriers created by the State. Examples were wide-ranging, but several themes emerged.

Decreased funding for programs and services. One of the most common barriers discussed by stakeholders is decreased funds for certain programs and services.

Rural community challenges. Many of the stakeholders representing rural communities shared that the State places the same administrative and financial requirements on their small community as larger places with more staff capacity. Suggestions for improvement include streamlining application processes to reduce staff time and allowing communities more flexibility with regard to local match requirements. Others suggested the need for technical assistance to staff in small communities so that they can qualify for state and federal funds.

Administrative burdens. Regardless of community size, a number of stakeholders discussed the burdens placed on staff for administering and applying for program funds. Applications are deemed to be complex and the pace of approval to be slow.

Regulatory burdens. Several stakeholders cited regulatory burdens such as obtaining permits from multiple state agencies that increase project costs and delay projects as a State-created barrier. Several suggested the need for INDOT to allow regional transportation coordination, particularly for public transit.

Lack of flexibility. Some stakeholders have the perception that the State proscribes the nature and type of project that communities must develop, rather than taking local needs into consideration. Examples included mandating a community undertake a very large project rather than developing small components over time; the emphasis on permanent housing for the homeless rather than funding emergency shelters or transitional housing; and requiring funds be used to rehabilitate multifamily buildings rather than allowing new construction. One stakeholder was concerned that the State's implementation of the Money Follows the Person (MFP) program is resulting in a much higher proportion of persons with disabilities being housing in nursing homes compared to rates achieved by other states.

Home rule limitations. Several stakeholders discussed their perception that the legislature and state agencies have and continue to impose rules that limit the ability of local governments to raise funds (e.g., TIF limitations) and manage their community (e.g., proposed legislation to limit rental property inspections).

Recommendations to the State of Indiana

Stakeholders provided recommendations to the State for increasing program effectiveness and discussed how they would change current policies and practices.

Opportunities to improve program effectiveness. Stakeholders offered numerous (nearly 200) suggestion for improving program effectiveness. Ideas suggested by multiple stakeholders include the following.

Provide technical assistance for local staff. Many stakeholders requested technical assistance for local staff and elected officials. Examples of the types of assistance desired include aid with funding applications, project development, community development planning, and education about different funding opportunities. Some would like assistance communicating with the development community and attracting affordable housing developers to their area.

Facilitate opportunities for information exchange and collaboration. A number of stakeholders would like to be educated about best practices in housing and homeless services and community development. Suggestion for how the State could facilitate this exchange include developing a website of best practices from Indiana communities, sponsoring workshops and webinars, and training sessions on implementing best practices.

Increase engagement with local communities. Several stakeholders would like to see the State engage with the local community outside of the audit process. They would like one-to-one communications, and site visits to help improve local program delivery—before audits, so that changes can be made. A number of stakeholders from very rural communities requested information from the State about grant programs they may qualify for.

Revisit QAP scoring. A few stakeholders suggested changing QAP scoring to reward projects that include visitability, more than the minimum number of accessible units, and projects proposed along transit corridors. They would like to see the needs of persons with disabilities be given a higher priority. Representatives from rural communities would like to see the scoring adjusted so that even small projects in rural communities are competitive. There is a perception among some stakeholders that rural communities do not benefit from this program.

Consider incentivizing adoption of visitability policies. A number of stakeholders urged the State to demonstrate support for adoption of visitability policies or practices that result in visitable housing.

Suggestions for change. Stakeholders made numerous suggestions for how they would change policies and practices for addressing housing, homeless and community development needs. The majority of ideas reiterated those discussed above.

Frequency and timing of grant programs. Several stakeholders suggested increasing the frequency of programs such as the Community Focus Fund to several times per year (quarterly) or even monthly like the planning grant application process. Others suggested developing an infrastructure grant round aligned to the federal funding cycle so that communities can leverage resources from both sources.

Educating rural communities about opportunities. Many stakeholders emphasized the need for communication from the State about opportunities for grants and loans as well as best practices for addressing housing, homeless and community development needs in small communities. Some suggested that the State consider offering meetings, workshops or programs in the evenings so that elected officials, many who work full-time jobs, could participate.

Learn from OCRA. With respect to easing the burden on rural units of local government to apply for funding and implement programs, one stakeholder complimented OCRA and urged other units of state government to adopt similar practices.

Increase the effectiveness of rural economic development and job training. Several stakeholders encouraged the State to increase the effectiveness of rural economic development efforts and to tailor job training programs to unmet needs of employers.

Explore opportunities to create economies of scale. One stakeholder suggested the State consider purchasing certain items, such as fire trucks, in bulk so as to achieve savings from a larger order. The stakeholder acknowledged this would reduce choice in the type of product purchased, but felt the cost savings would outweigh the lack of choice.

Maintain transitional housing programs. A number of stakeholders expressed concern about the focus of homeless policy on rapid re-housing solutions rather than transitional housing. One stakeholder serving victims of domestic violence emphasized that this population must have safe, secure transitional housing and that permanent housing solutions are not effective for this population. Other providers of transitional housing programs encouraged the State to find funding to maintain these programs.

Minimize staff turnover. Several stakeholders expressed concern about turnover in key positions at state agencies and the impact on such change on institutional knowledge, program administration knowledge and understanding of rural issues.

Anticipated outcomes if change is made. If the recommended changes are made, stakeholders believed that affordable housing opportunities would increase, rural communities would see positive change and programs would be administered more efficiently and to greater effect.

NOTICE OF PUBLIC HEARING
FY 2013 CONSOLIDATED PLAN FOR FUNDING

Para ver una versión española de este anuncio de la audición, www.in.gov/ocra visita. Para traducciones al español de los documentos mencionados en este anuncio, escribir al Indiana Office of Community and Rural Affairs, One North Capitol, Suite 600, Indianapolis, Indiana 46204, o E-mail bdawson2@ocra.in.gov.

INDIANA OFFICE OF COMMUNITY AND RURAL AFFAIRS
INDIANA HOUSING AND COMMUNITY DEVELOPMENT AUTHORITY

Pursuant to 24 CFR part 91.115(a)(2), the State of Indiana wishes to encourage citizens to participate in the development of the State of Indiana Consolidated Plan for 2013. In accordance with this regulation, the State is providing the opportunity for citizens to comment on the 2013 Consolidated Plan draft report, which will be submitted to the US Department of Housing and Urban Development (HUD) on or before May 15, 2013. The Consolidated Plan defines the funding sources for the State of Indiana's four (4) major HUD-funded programs and provides communities a framework for defining comprehensive development planning. The FY 2013 Consolidated Plan will set forth the method of distribution of funding for the following HUD-funded programs:

State Community Development Block Grant (CDBG) Program
Home Investment Partnership Program
Emergency Solutions Grant Program
Housing Opportunities for Persons With AIDS Program

These public hearings will be conducted **on Tuesday, April 23** at several **Ivy Tech Community College** campuses (http://www.ivytech.edu/) across the state. Your choices of Ivy Tech campuses are:

Indianapolis
Fairbanks Building,
Room F230
9301 E. 59th St.
Lawrence, IN 46216
2:00 p.m. or
5:30 p.m. EDT

Valparaiso
Auditorium
3100 Ivy Tech Drive
Valparaiso, IN 46383
1:00 p.m. or
4:30 p.m. CDT

Lafayette
3101 South Creasy Lane
Griffin Hall, Room 131
Lafayette, IN 47903
2:00 p.m. or
5:30 p.m. EDT

Madison
590 Ivy Tech Drive
Room 1075
Madison, IN 47250
2:00 p.m. or
5:30 p.m. EDT

Richmond
Stidham Auditorium, #1239
2357 Chester Boulevard
Richmond, IN 47374
2:00 p.m. EDT

Evansville
Room 201
3501 North First Ave.
Evansville, IN 47710
1:00 p.m. or
4:30 p.m. CDT

All members of the public are invited to review the draft Plan prior to submission April 10, 2013 through May 10, 2013 during normal business hours of 8:30am to 5:00pm, Monday-Friday, at the Indiana Office of Community and Rural Affairs. A draft Plan will also be available on the IHCDA website (www.in.gov/ihcda) and the OCRA website (www.in.gov/ocra).

Written comments are invited from Wednesday, April 10, 2013 through Friday, May 10, 2013, at the following address:

Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027

Persons with disabilities will be provided with assistance respective to the contents of the Consolidated Plan. Interested citizens and parties who wish to receive a free copy of the Executive Summary of the FY 2013 Consolidated Plan or have any other questions may contact the Indiana Office of Community and Rural Affairs at its toll free number 800.824.2476, or 317.232.8911, during normal business hours or via electronic mail at bdawson2@ocra.in.gov.

Describe consultation with the Continuum(s) of Care that serves the State 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.

The Indiana Planning Council on the Homeless is the governing body for the Balance of State Continuum. In March 2013, , the State ESG program presented its plans on the use of ESG funds for rapid re-housing activities, homeless prevention, outreach, essential services, operations and data entry (HMIS) including the plan to merge the ESG allocation process with the Continuum of Care planning and funding policy and procedures. The Planning Council has four primary committees: Data Collection and Evaluation, Funding and Strategies, Quality and Performance, and Housing and Program Continuum Development. The State ESG program will be part of the work of each committee.

During the 2013 program year, the State ESG program will continue to further the goals of Continuum of Care and further the state's efforts to end homelessness by establishing common performance goals. The guiding philosophies include a Housing First model for homelessness solutions, the need for an effective outreach and triage infrastructure to prevent homelessness and rapidly re-house individuals and families experiencing homelessness, and the proven efficacy of permanent supportive housing and rapid re-housing. The strategic objectives of the Planning Council are to:

1. Decrease shelter stays by increasing rapid re-housing to stable housing.
2. Reduce recidivism of households experiencing homelessness.
3. Decrease the number of Veterans experiencing homelessness.
4. Decrease the number of persons experiencing Chronic Homelessness.
   - Create new permanent supportive housing beds for chronically homeless persons.
   - Increase the percentage of participants remaining in Continuum of Care funded permanent housing projects for at least six months to 86 percent or more.
5. Decrease the number of homeless households with children.
   - Increase the number of rapid re-housing vouchers and services.
   - Increase the percentage of participants in Emergency Solutions Grant funded rapid re-housing that move into permanent housing to 82 percent or more.
   - Increase the percent ate of participants in Continuum of Care funded transitional housing that move into permanent housing to 70 percent or more.
6. Increase the percentage of participants in Continuum of Care funded projects that are employed at exit to 38 percent or higher.
7. Increase persons experiencing homelessness access to mainstream resources.

8. Collaborate with local education agencies to assist in the identification of homeless families and inform them of their eligibility for McKinney-Vento education services.

9. Improve homeless outreach and triage to housing and services.

10. Improve HMIS data quality and coverage, and use data to develop strategies and policies to end homelessness.

11. Develop effective discharge plans and programs for individuals leaving State Operated Facilities at risk of homelessness.

The Data Collection and Evaluation Committee will provide oversight and monitor the use of HMIS to measure performance measures such as length of shelter stays and recidivism as well as tracking housing stability measures for the rapid re-housing program. This committee will also advise the HMIS lead agency during the implementation of the Arizona Matrix as both a vulnerability index to inform case managers developing housing plans with participants and program level performance reports for the Funding and Strategies committee.

The State ESG program allocation process is now being merged with the Funding and Strategies committee which has oversight of the Balance of State competitive McKinney Vento Homeless Assistance funds. By aligning ESG and CoC funding, the State will be in a position to use ESG rapid re-housing funds strategically with Supportive Housing Program and Shelter Plus Care funds. In addition, the alignment will also allow allocation of ESG funds to be better informed by the Point in Time Count, Housing Inventory Count, and HMIS data. This committee will participate in reviewing the ESG Rapid Re-housing proposals submitted.

The Quality and Performance committee is being consulted to develop shelter and rapid re-housing quality standards using national best practices and a housing first approach to homeless assistance. The shared quality standards will focus on reduction in the length of homelessness, reduction in the return to homelessness and improved engagement and efficacy of all homeless assistance programs.

The Housing and Program Continuum Development committee will work with the state ESG program to develop and coordinate regional central intake and triage centers to insure access to assistance is driven by the needs of persons experiencing homelessness. The Housing and Program Continuum Development committee will also coordinate the State ESG program with the Continuum of Care strategic planning around key community service systems: housing, employment, child care, youth services, primary health care, behavior health care, addiction treatment and other mainstream resources.

INDIANA OFFICE OF Community & Rural Affairs
Where Rural Matters

ihcda
Indiana Housing & Community Development Authority

Presented by:

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aggeler@bbcresearch.com
www.bbcresearch.com

STATE OF INDIANA

Consolidated Plan, 2013 Action Plan

Public Hearing — April 23, 2013

Agenda

- Introductions and hearing rules
- Background on the Consolidated Plan
- What's New in 2013
- 2013 Action Plan
- Public comments and input

Introduction and Forum Rules

- **To ensure that everyone in attendance has a chance to voice their opinion and to make sure we can hear all comments:**
  - **Please hold your comments to 2 minutes on each subject. This will give everyone an equal chance to make comments.**
  - **Please do not interrupt or debate others. There are no right or wrong answers in our discussion today!**
  - **If you have more to say, or have very detailed questions about programs, visit with us after the hearing or contact one of us later (contact information is on both the cover and last slide).**

Purpose of the Consolidated Plan

- **In 1995, the U.S. Department of Housing and Urban Development (HUD) began requiring states and local communities to prepare a Consolidated Plan in order to receive federal housing and community development funding.**
- **The purpose of the Consolidated Plan is:**
  - **To identify a state's housing and community development needs, priorities, goals and strategies.**
  - **To stipulate how funds will be allocated to state housing and community development non-profit organizations and local governments.**
- **This is the State of Indiana's Consolidated Plan 2013 Action Plan (4th Action Plan in 5 year cycle).**

The State of Indiana's Consolidated Plan

- **Five-Year Strategic Plan and Annual Action Plans**
  - **Pertains to specific HUD funding programs:**
    - ***Community Development Block Grant (CDBG)***
    - ***Home Investment Partnerships Program (HOME)***
    - ***Emergency Solutions Grant Program (ESG)***
    - ***Housing Opportunities for Persons with AIDS (HOPWA)***
- **The last Analysis of Impediments to Fair Housing Choice (AI) was completed in 2010. The Five-year Consolidated Plan includes a Fair Housing Assessment and Fair Housing Action Plan (FHAP). The AI update will be updated this summer and fall after release of new requirements from HUD.**

What will the State receive from HUD?
(2013 estimated funding allocations)

CDBG	$27,100,000
HOME	$9,700,000
ESG	$3,400,000
HOPWA	$1,000,000
TOTAL	$41,200,000

What's New in 2013?

- The 2013 Action Plan is prepared using HUD's required online eCon Plan suite. This format will be used for Action Plans and CAPERs in the future.

- Program modifications:

  - HUD is in the process of reviewing Indiana's proposal to issue debt backed by future CDBG allocations through the Section 108 Loan Guaranty program. See the "Grantee Unique Appendices" in the 2013 Action Plan for program details and requirements.

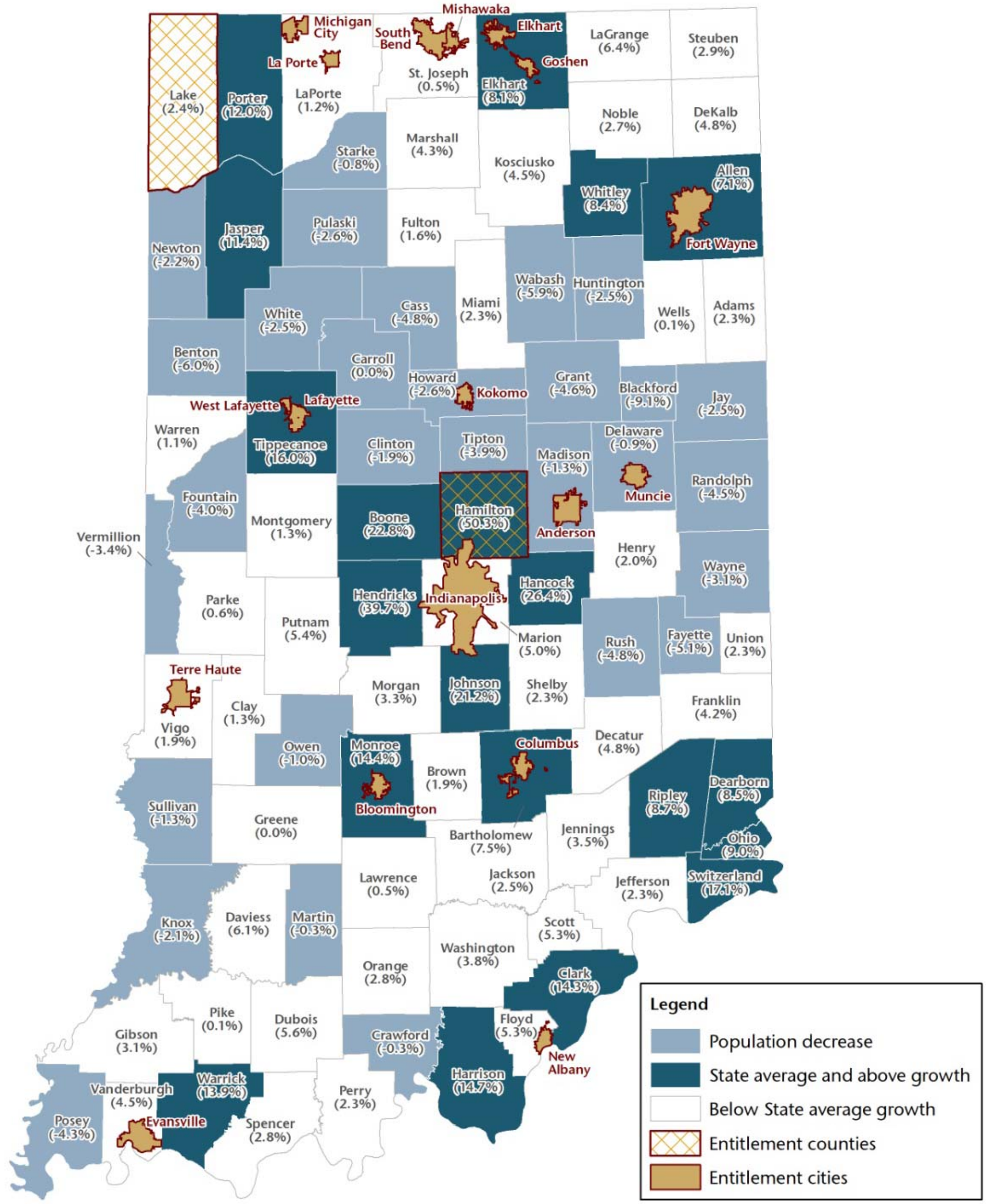
  - IHCDA is eliminating the “Strategic Investment Process” or SIP used in past years. HOME and CDBG-Housing will now be allocated through a competitive scoring process, with set application rounds and deadlines.

  - ESG continues to focus on programs to prevent homelessness, including rapid rehousing of persons who are newly homeless or at imminent risk of homelessness. Allocation for operating support is higher.

2000-2010 Population Change by County

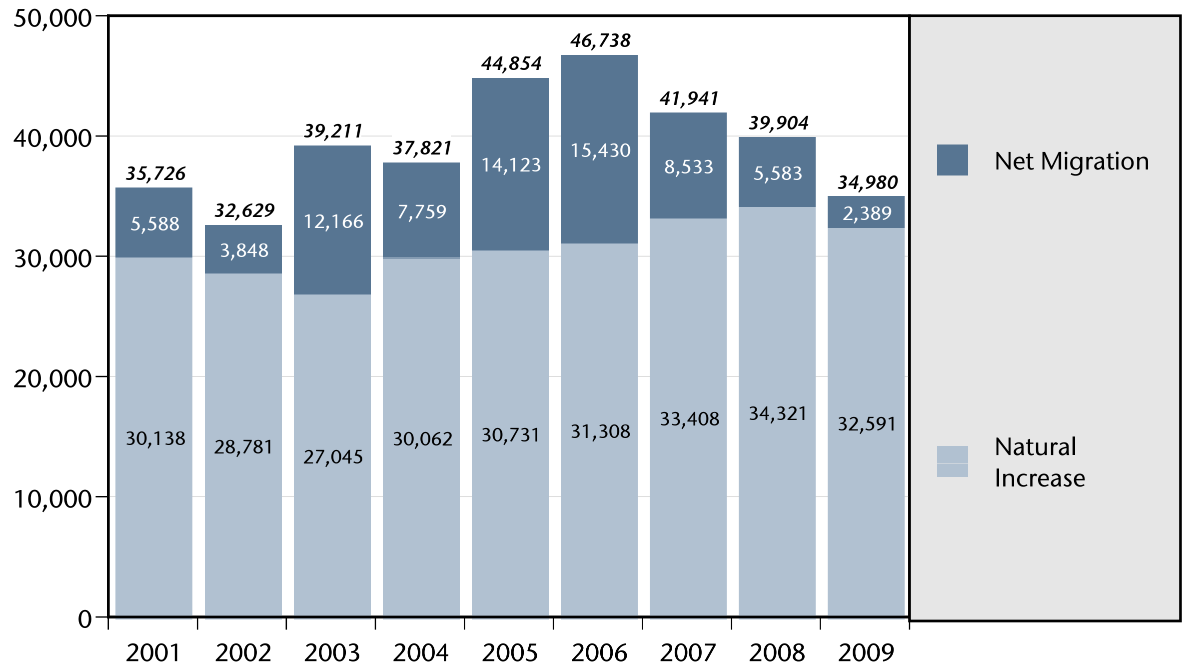
Indiana's population grew 6.6% from 2000 to 2010

- **Illinois = 3.3%**
- **Kentucky = 7.4%**
- **Michigan = -0.6%**
- **Ohio = 1.6%**



Reasons for Population Change

Components of Population Change, State of Indiana, 2001 to 2009



Note:
Population changes for each year are from July 1 to July 1 of the next year.
The 2000 population change is not included because it is from April 1 to July 1 of 2000.

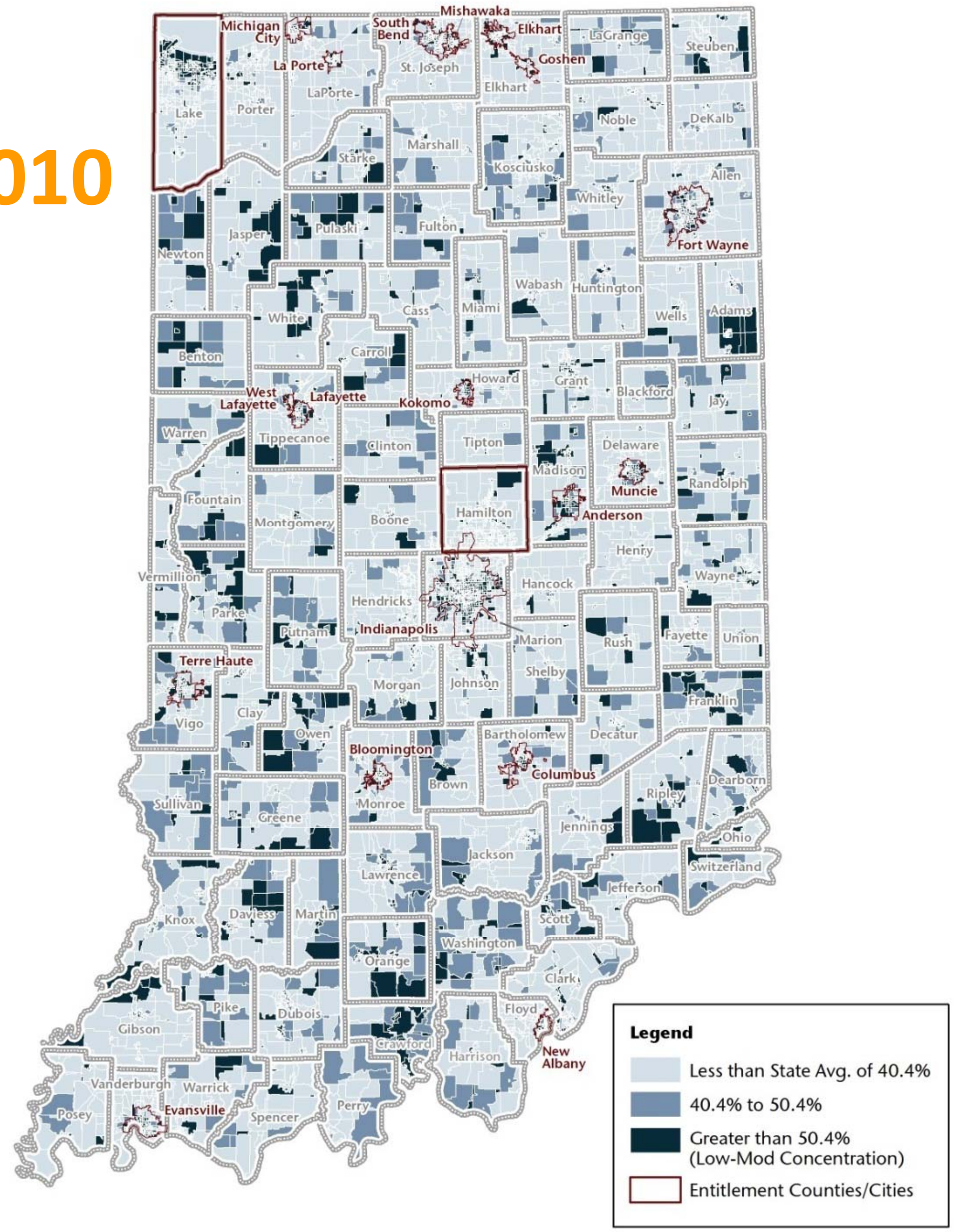
Source:
U.S. Census Bureau's Population Estimates.

Low and Moderate Income Concentrations, 2010

Block Groups in which Low and Moderate Income Population is Greater than the State Average of 40.4%

Note:
In 2010, the low and moderate income universe made up 40.4 percent of the State's population. The shaded Block Groups have a higher percentage of their population that is low and moderate Income than the State overall.

Source:
U.S. Department of Housing & Urban Development (HUD)



Income and Poverty in Indiana, 2010

- **Indiana household's income distribution changed little between 2000 and 2010 except for high end growth**
- **15% of Indiana's population lived in poverty in 2010**
  - **Poverty rates are highest for children**
  - **Minorities have much higher rates of poverty**
  - **21% of persons with disabilities (or 166,121 people) lived in poverty in 2009**

Percent Living Below the Poverty Level, State of Indiana, 2000 and 2010

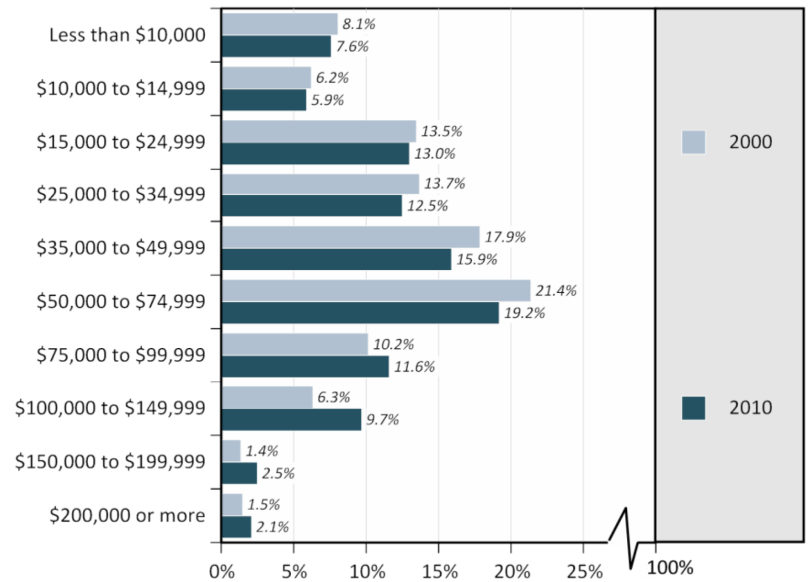
Source:
U.S. Census Bureau's 2000 Census and 2009 American Community Survey.

	2000	2010	Net Change from 2000 to 2010
All residents	9%	15%	6%
Persons under age 18	12%	22%	10%
Persons age 18 to 64	9%	15%	6%
Persons age 65 and older	8%	7%	(1%)
Families with related children under 18 years	10%	18%	8%
Female head of household w/related children present	30%	41%	11%

Income and Poverty in Indiana, 2010

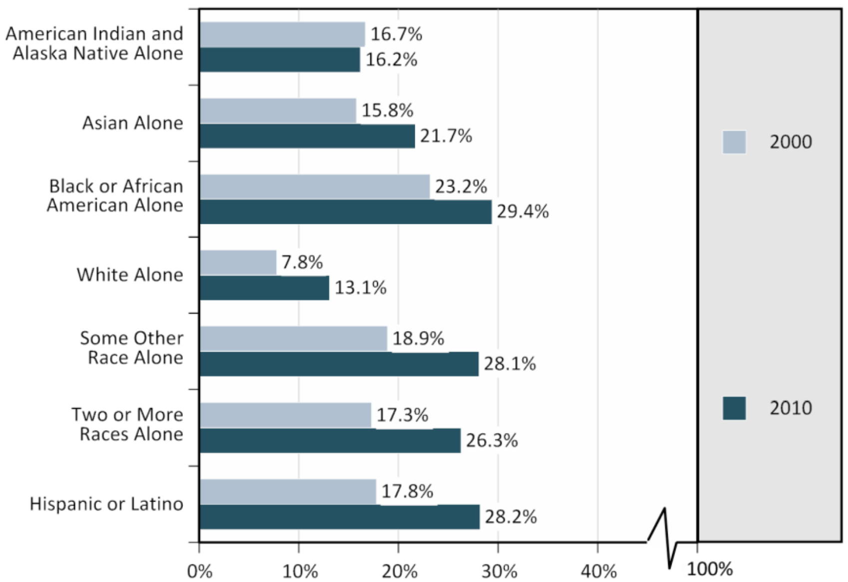
Percent of Households by Income Bracket, State of Indiana, 2000 and 2010

Source: 2010 Census.



Percentage of Population Living Below the Poverty Level by Race and Ethnicity, State of Indiana, 2000 and 2010

Source:
2000 Census and 2010 American Community Survey.

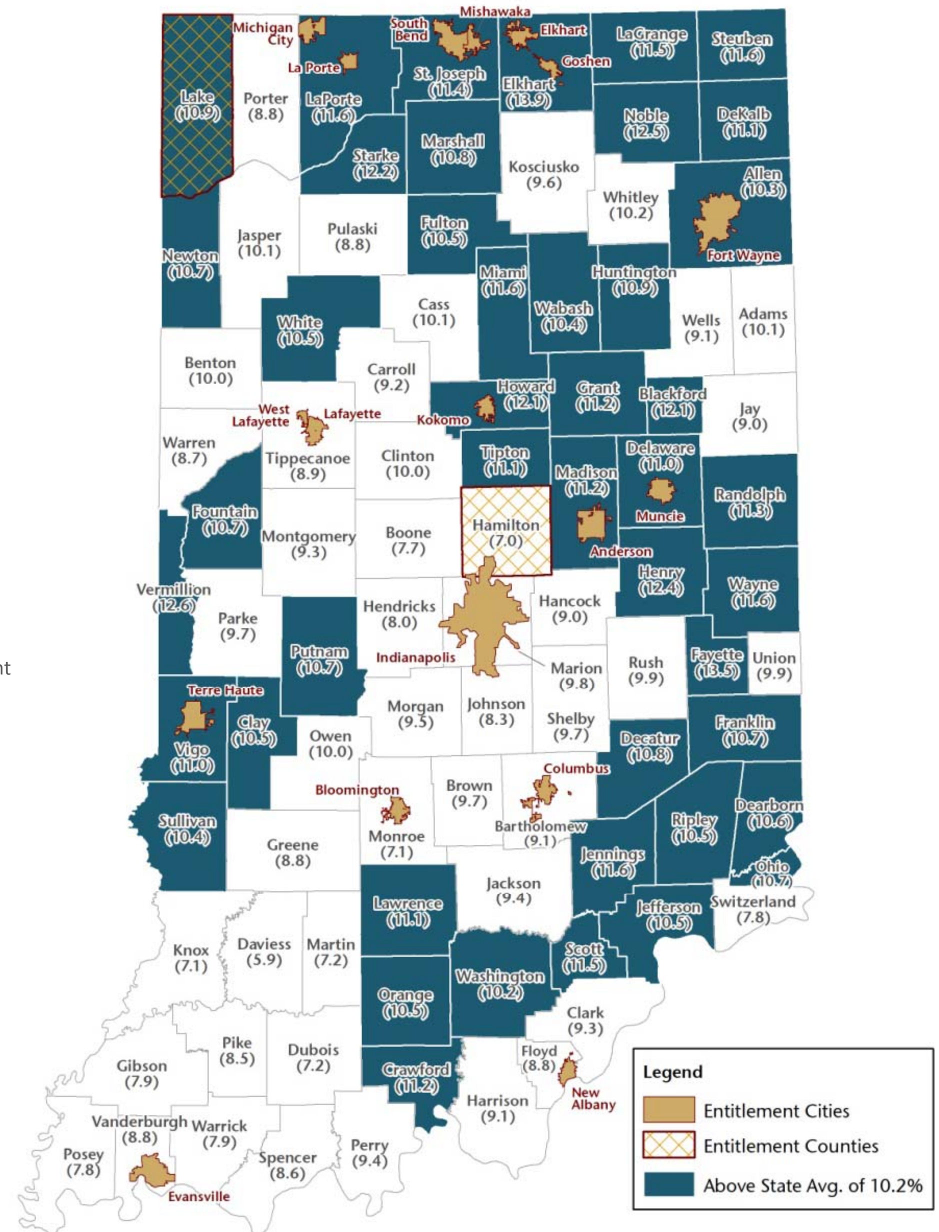


Unemployment and Wages

Average Annual Unemployment Rate, by County, State of Indiana, 2010

Note:
Indiana's average unemployment rate was 10.2 percent in 2010.
Shaded counties have rates higher than the State's average unemployment rate overall.

Source:
Bureau of Labor Statistics as compiled by the Indiana Business Research Center, IU Kelley School of Business.

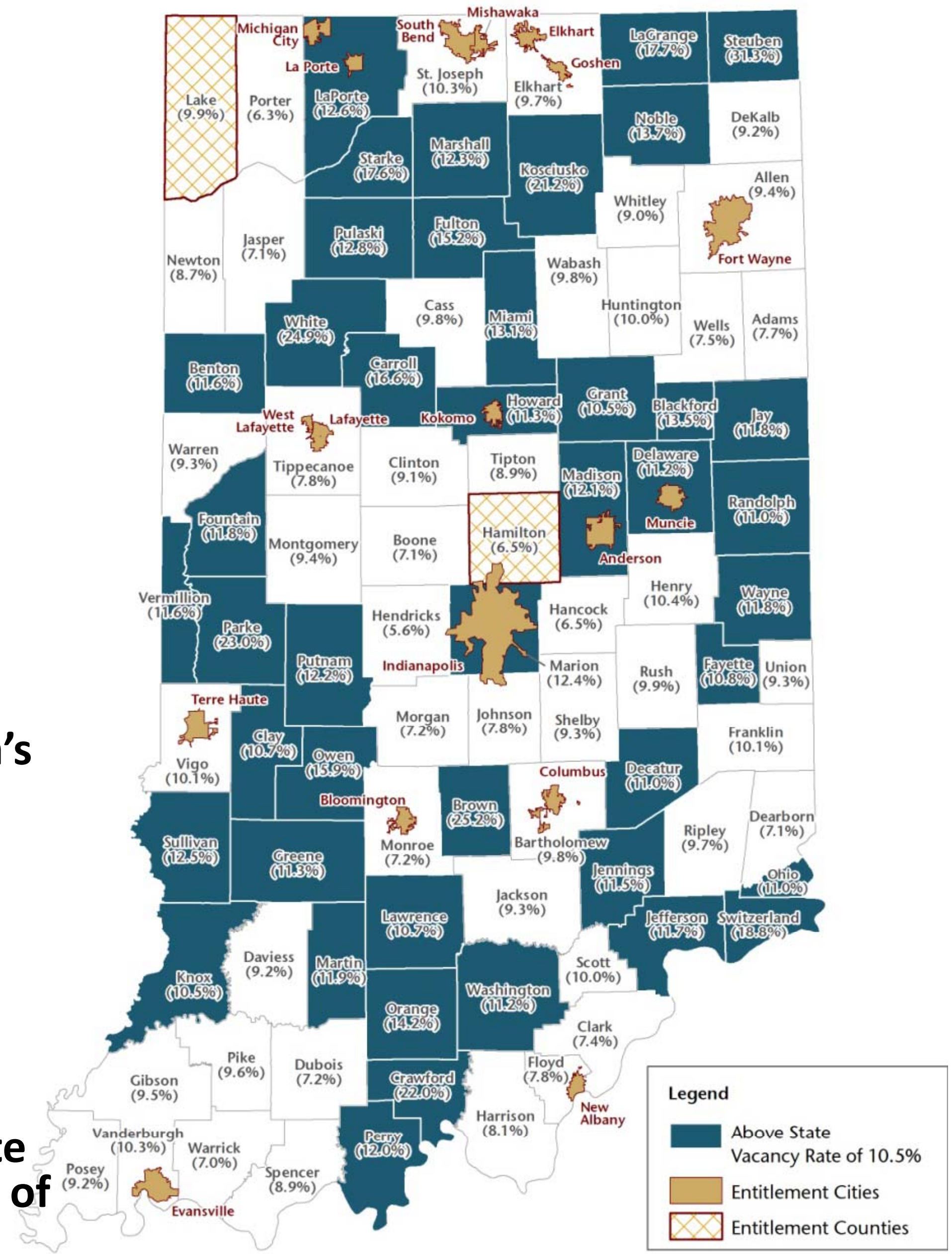


Housing

Percent of Housing Units That Are Vacant, Indiana Counties, 2010

Note:
Indiana's overall housing unit vacancy rate was 10.5 percent in 2010.

Source:
U.S. Census Bureau, compiled by Indiana Business Research Center

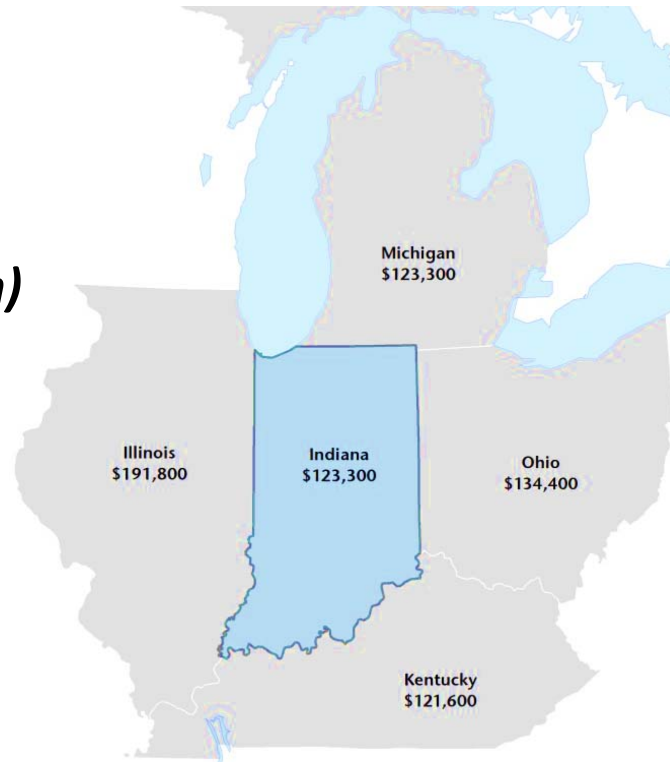


- 2010 Census indicates Indiana's housing stock increased by 263,222 housing units (or by 10%) from 2000 to 2010.
- In 2010, 10.5% of Indiana's housing units were vacant
- An increase of the vacancy rate compared to 2000 when 7.7% of the units were vacant

Housing Costs and Affordability

- **Median home price, 2010 = $123,300**
  (up 31% from 2000 — $94,300)
- **Median rent, 2010 = $683 per month**
  (up 32% from 2000 — $521 per month)

Regional Median Owner Occupied Home Value, State of Indiana, 2010

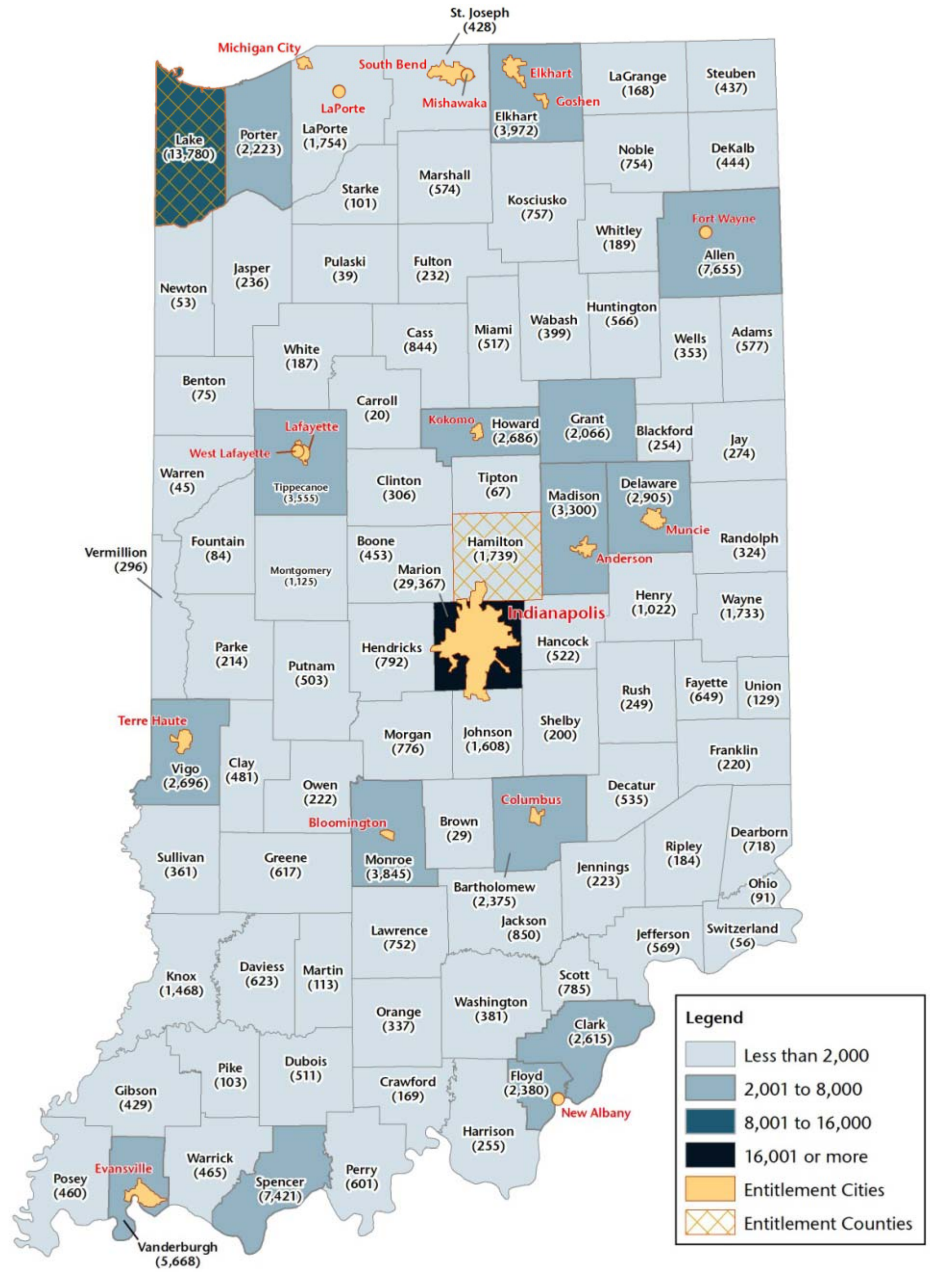


Source:
U.S. Census Bureau's 2010 American Community Survey.

Housing Costs and Affordability

Number of Subsidized Housing Units by County, 2008

Source:
HUD's Picture of Subsidized Housing 2008.



Public Input/Consultation

- **A Housing and Community Development Needs Survey was made available to many types of stakeholders in Indiana. The survey was sent to more than 800 organizations that provide assisted housing (public housing authorities and nonprofits), social service and health care services, and that assist low income and special needs residents. Access the survey at:**

  https://www.surveymonkey.com/s/IN_AnnualPlan_and_AI

- **Focus groups with stakeholders and residents were conducted and are ongoing. The purpose of these groups is to discuss the allocation of HUD block grant funds, state programs and priorities and fair housing barriers.**

Five-Year Consolidated Plan, Strategic Goals

Goal 1: **Expand and preserve affordable housing opportunities throughout the housing continuum**

Goal 2: **Reduce homelessness and increase housing stability for special-needs populations**

Goal 3: **Promote livable communities and community revitalization through addressing unmet community development needs**

Goal 4: **Promote activities that enhance local economic development efforts**

Priorities (also Five-year Goals)		HUD Objective Code	2013 Goals and Projects	Indicator	Project Outcomes: Five Year	Project Outcomes: Year Four	Funding for Year Four: CDBG	Funding for Year Four: HOME	Funding for Year Four: ESG	Funding for Year Four: HOPWA	2013 Year Funds
1. Expand and preserve affordable housing opportunities throughout the housing continuum.	Rental housing.	DH-2.1	➢ Rehabilitation and new construction	Units	675	100		$4,700,000			**$ 4,700,000**
	Homeownership opportunities.	DH-2.2	➢ Homeownership education and counseling and downpayment assistance	Households	2,500	700		$1,000,000			**$ 1,000,000**
			➢ Homebuyer development	Units	125	25		$1,000,000			**$ 1,000,000**
			➢ Owner-occupied rehabilitation	Units	1,500	240	$2,752,934				**$ 2,752,934**
	Build capacity for affordable housing developers.	DH-2.3	➢ Predevelopment loans	Units	25	5		$250,000			**$ 250,000**
			➢ Organizational capacity	Units	80	8		$250,000			**$ 250,000**
2. Reduce homelessness and increase housing stability for special needs populations.	Improve the range of housing options for homeless and special needs populations.	DH-1.1	➢ Permanent supportive housing	Units	250	40		$1,500,000			**$ 1,500,000**
			➢ Rental assistance	Units	1,000	200		$500,000			**$ 500,000**
			➢ Migrant farmworker housing	Units	N/A	40	$500,000				
	Support activities to improve the range of housing options for special needs populations and to end chronic homelessness.	DH-1.2	➢ Operating support	Shelters	55	55			$1,600,000		**$ 1,600,000**
			➢ Essential services	Persons	80,000	15,000			$282,386		**$ 282,386**
			➢ Rapid re-housing	Persons	N/A	130			$1,254,924		**$ 1,254,924**
	Improve the range of housing options for special needs populations living with HIV/AIDS.	DH-1.3	➢ Housing information services	Households	375	75				$100,000	**$ 100,000**
			➢ Permanent housing placement services	Households	500	100				$50,000	**$ 50,000**
			➢ Supportive services	Households	1,000	0				$0	**$ -**
		DH-2.4	➢ Tenant based rental assistance	Units	1,000	110				$500,000	**$ 500,000**
			➢ Short-term rent, mortgage and utility assistance	Units	1,500	220				$200,000	**$ 200,000**
			➢ Facility based housing operations support	Units	35	15				$50,000	**$ 50,000**
			➢ Short term supportive housing	Units	100	5				$50,000	**$ 50,000**
3. Promote livable communities and community revitalization through addressing unmet community development needs.	Improve the quality and/ or quantity of neighborhood services for low and moderate income persons.	SL-1.1	➢ Community Focus Fund								
			—Emergency services (stations & fire struck)	Projects	35-45	8	$2,000,000				**$ 2,000,000**
			— Public facilities	Facilities	30	7	$2,000,000				**$ 2,000,000**
			—Historic preservation projects	Projects	10	2	$500,000				**$ 500,000**
			—Brownfield/clearance projects	Projects	10-25	8	$150,000				**$ 150,000**
	Improve the quality and/or quantity of public improvements for low and moderate income persons.	SL-1.1	➢ Public Facilities Program								
			—Emergency services (stations & fire trucks)	Projects		2	$800,000				**$ 800,000**
			— Public facilities	Facilities		2	$800,000				**$ 800,000**
			— Historic preservation projects	Projects		1	$400,000				**$ 400,000**
		SL-3.1	➢ Community Focus Fund								**$ -** **$ -**
			—Infrastructure systems	Systems	120	6	$3,441,616				**$ 3,441,616**
		SL-3.1	➢ Water/Wastwater Partnership Program								
			— Infrastructure systems	Systems		9	$3,500,000				
		SL-3.1	➢ Stormwater Improvements Program								
			— Infrastructure systems	Systems		4	$2,000,000				
		SL-3.2	➢ Planning Fund	Grants	145	50	$1,300,000				**$ 1,300,000**
		SL-3.3	➢ Stellar Communities	Projects		6	$4,000,000				**$ 4,000,000**
			➢ Main Street Revitalization Program	Projects		4	$1,300,000				**$ 1,300,000**
4. Promote activities that enhance local economic development efforts.	Coordinate with private industry, businesses and developers to create jobs for low to moderate income populations in rural Indiana.	EO-3.1	➢ Section 108 Loan Program	Jobs	1,300	150	$2,000,000				$ -
		EO-3.1	➢ Comprehensive Brownfield Redevelopment Program	Projects		5	$750,000				
Administrative and supportive services			➢ CDBG admin. (OCRA and IHCDA)				$642,156				**$ 642,156**
			➢ HOME admin. (IHCDA)					$500,000			**$ 500,000**
			➢ HOPWA admin. (IHCDA)							$100,000	**$ 100,000**
			➢ ESG program admin. (IHCDA)						$257,156		**$ 257,156**
			➢ Tech. assist. set-aside (OCRA)				$271,078				**$ 271,078**
						TOTAL	**$27,107,784**	**$9,700,000**	**$3,394,466**	**$1,050,000**	**$ 41,252,250**

Your Input

- What do you think of the changes in the 2013 Action Plan?
- What do you like best? The least?
- What questions do you have today?
- How would you like to be involved in this planning process in the future?

How to Comment on the 2013 Action Plan

- **Through May 11, 2013 you may send email to:**

  bdawson2@ocra.IN.gov

- **Send a letter to:**

  Indiana Office of Community and Rural Affairs
  One North Capitol Avenue, Suite 600
  Indianapolis, IN 46204-22288

  Attn: Consolidated Plan

- **Access the draft Plan at:**

  http://www.in.gov/ihcda

  OR

  http://www.in.gov/ocra

INDIANA OFFICE OF Community & Rural Affairs Where Rural Matters

ihcda Indiana Housing & Community Development Authority

Indy

State of Indiana Consolidated Plan
2013 Annual Action Plan
Public Hearing, April 23, 2013

SIGN IN

Thank you for attending the 2013 Annual Action Plan Public Hearing. Please sign your name.
If you would like to receive a final copy of the Action Plan, please leave your mailing or email address.

Name	*Organization/Address (mailing or email)*
Eric A Frey	ARC, 748 Franklin, 47203
Brand Dickerson	accessABILITY, 5302 E. Washington St
Deborah McCarty	Back Home in Indiana Alliance dlmccart1@aol.com
Amber O'Haver	accessABILITY → aohaver@abilityindiana.org

INDIANA OFFICE OF Community & Rural Affairs Where Rural Matters

SEAL OF THE STATE OF INDIANA 1816

ihcda Indiana Housing & Community Development Authority

State of Indiana Consolidated Plan
2013 Annual Action Plan
Public Hearing, April 23, 2013

Lafayette

SIGN IN

Thank you for attending the 2013 Annual Action Plan Public Hearing. Please sign your name.

If you would like to receive a final copy of the Action Plan, please leave your mailing or email address.

Name	*Organization/Address (mailing or email)*
Todd P. Westbrook	The Salvation Army - todd_westbrook@usc.salvationarmy.org
Major Jim Irvine	The salvation Army jim_irvine@usc.salvationarmy.org
Angie Hass	ahass@ihcda.in.gov IHCDA
Barbara AHLER	Habitat for Humanity of Lafayette barb@lafayettehabitat.org
JONI BIESECKER	MHA jonib@mhalafayette.org
Shay Johnson in place of Joyce Fasani at	Lafayette Urban ministry

INDIANA OFFICE OF Community & Rural Affairs Where Rural Matters

ihcda Indiana Housing & Community Development Authority

Indiana Consolidated Plan

Lafayette

2013 Annual Action Plan

Public Hearing, April 23, 2013

PUBLIC COMMENTS

We want to hear from you!

Please leave us your comments about the Consolidated Plan. We want to know your thoughts about everything, ranging from the draft report to the funding allocation plans.

If you would like to receive a final copy of the 2013 Action Plan, please make sure you have put your name and address on the sign-in sheet. Thank you!

Name: BARBARA AHLER

Habitat for Humanity of Lafayette
420 S. 1st ST., Lafayette, IN 47905
barb@lafyettehabitat.org
Please send a copy of the Cons Plan by email
or if necessary by mail.

MHA of Tipp.
914 SOUTH STREET
LAFAYETTE. IN 47902

jonib@mha.lafayette.org

INDIANA OFFICE OF
Community & Rural Affairs
Where Rural Matters

ihcda
Indiana Housing & Community Development Authority

State of Indiana Consolidated Plan
2013 Annual Action Plan

Richmond

Public Hearing, April 23, 2013

SIGN IN

Thank you for attending the 2013 Annual Action Plan Public Hearing. Please sign your name.

If you would like to receive a final copy of the Action Plan, please leave your mailing or email address.

Name	Organization/Address (mailing or email)
TRaci TAYLOR	Back Home in Indiana Alliance + Independent Living Center of Eastern Indiana (ILCEIn)
Mike Recker	IHCDA mrecker@ihcda.in.gov
Matt Rayburn	IHCDA mrayburn@ihcda.in.gov
Lori Dimick	IHCDA ldimick@ihcda.in.gov

INDIANA OFFICE OF
Community & Rural Affairs
Where Rural Matters

ihcda
Indiana Housing & Community Development Authority

Indiana Consolidated Plan

2013 Annual Action Plan

Public Hearing, April 23, 2013

PUBLIC COMMENTS

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Name: Valparaiso 1pm Central / 2pm Eastern

Alora Johnson Housing Opportunities 219-548-2800

LaTosha Knight 2001 Calumet Avenue Housing Opportunities Inc.

INDIANA OFFICE OF
Community & Rural Affairs
Where Rural Matters

SEAL OF THE STATE OF INDIANA 1816

ihcda
Indiana Housing & Community Development Authority

Indiana Consolidated Plan

2013 Annual Action Plan

Public Hearing, April 23, 2013

PUBLIC COMMENTS

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Name: Valparaiso 4:30 Central/5:30 Eastern

twilliams@steppingstoneshelter.org

Tanya Williams Stepping Stone Shelter for Women, Inc

PO Box 1045, MC, IN 46361

Jessica Jepsen, Stepping Stone Shelter for Women Inc.

PO Box 1045 Michigan City, IN 46361

INDIANA OFFICE OF Community & Rural Affairs Where Rural Matters

ihcda Indiana Housing & Community Development Authority

State of Indiana Consolidated Plan
2013 Annual Action Plan
Public Hearing, April 23, 2013

Madison

SIGN IN

Thank you for attending the 2013 Annual Action Plan Public Hearing. Please sign your name.

If you would like to receive a final copy of the Action Plan, please leave your mailing or email address.

Name	Organization/Address (mailing or email)
Deb Bedwell	ahshelter@anchorhouseshelter.org anchor house
Carrie Kruse	carriekruse@turningpointdv.org

2:00

INDIANA OFFICE OF Community & Rural Affairs Where Rural Matters

ihcda Indiana Housing & Community Development Authority

1:00 CDT SESSION

Evansville

State of Indiana Consolidated Plan
2013 Annual Action Plan
Public Hearing, April 23, 2013

SIGN IN

Thank you for attending the 2013 Annual Action Plan Public Hearing. Please sign your name.

If you would like to receive a final copy of the Action Plan, please leave your mailing or email address.

Name	*Organization/Address (mailing or email)*
Theresa Hartwig	Commonwealth Engineers
JENNY BALLARD	ALBION FELLOWS BACON CENTER
Jennifer Smith	Aurora Inc.
Sharon Gillespie	ECHO Housing Corp. sharon-gillespie@sbcglobal.net
Debbie Bennett Stearsman	EDC
Wylie Zeigler	"
Megan Southwell	"
Tony Pappano	Insight 2000, Inc. insight2000inc@yahoo.com
JENNY BALLARD - COULD YOU SCAN THE SIGN IN SHEET (jenny.ballard@albionfellowsbacon.org	

INDIANA OFFICE OF
Community & Rural Affairs
Where Rural Matters

ihcda
Indiana Housing & Community Development Authority

4:30 CDT SESSION
Evansville

Indiana Consolidated Plan

2013 Annual Action Plan

Public Hearing, April 23, 2013

PUBLIC COMMENTS

We want to hear from you!

Please leave us your comments about the Consolidated Plan. We want to know your thoughts about everything, ranging from the draft report to the funding allocation plans.

If you would like to receive a final copy of the 2013 Action Plan, please make sure you have put your name and address on the sign-in sheet. Thank you!

Name: ______________________________

Tony Pagg

TOWN OF MONTGOMERY

May 8, 2013

Consolidated Plan
ATTN: Ms. Kathleen Weissenberger
Director of Community Affairs
Indiana Office of Community and Rural Affairs
One North Capitol, Suite 600
Indianapolis, IN 46204-2027

RE: 2014 Consolidated Plan

Dear Ms. Weissenberger:

It has come to my attention that the Consolidated Plan for the State in 2014 may have some drastic changes to its programs. It is a concern to us for the small rural areas that the CDBG program is intended for could be left out or unable to obtain the current proposed programs, specifically for infrastructure improvements to systems for water and wastewater.

I understand that the State strives to help correct or improve our systems when health and safety issues are present. The proposed plan seems to limit small areas to substantial debt or not being able to make improvements at all. The other funding agencies are often needed, but are not always a necessity for a community's improvements or in order to meet regulations that have been placed on a community by a regulatory office such as IDEM. A lot of communities may not need their entire system overhauled but rather they just need a certain piece improved or upgraded to meet current standards or functions of the system.

Bonding a project adds significant non-construction costs for attorneys and rate professionals that truly aren't needed for some smaller sized projects that have to be made to keep a system up and running. This sometimes adds additional engineering fees for jumping through these agencies hoops. Some bigger projects warrant these requirements but not all projects do or should. These requirements often cause delays in being able to get the fix done to a system in a timely manner, unless warranted for substantial change in scope of operation. Not to mention leave a community in debt for 30-40 years and then their system is in need again before these debts are fully paid off.

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MAY 09 2013

Personal experience tells me that the timing between agencies is the true problem or concern that needs to be addressed in order to better accommodate for the CDBG programs that are a truly great benefit to our communities when you can get them to fit the requirements of everyone.

We do thank the State for their continued support to communities in Indiana, but fear some of these changes could significantly hinder communities that you strive to help.

Sincerely,

J. Michael Healy
President
Town Council of Montgomery

INDIANA OFFICE OF
Community & Rural Affairs
Where Rural Matters

May 9, 2013

J. Michael Healy
Montgomery Town Council President
PO Box 57
Montgomery, IN 47558

Dear Mr. Healy:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

City Of Washington

May 3, 2013

Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol, Suite 600
Indianapolis, IN 46204-2027

Re: Comments on changes to CDBG-Community Focus Fund Program

To Whom It May Concern:

Please accept this respectfully-submitted letter opposing the new proposed guidelines included in the Draft Indiana 2013 Action Plan. I believe the new restrictions, while I'm sure are well-intended, will severely restrict the ability of cites & towns, particularly smaller rural ones, to obtain benefits from the Community Focus Fund Program.

The requirement to use SRF and/or USDA RD funds can be cumbersome. The engineering and bond counsel expenses in order to participate in these programs are high and many smaller communities will be unable to afford those additional expenses that add to the cost of water & wastewater projects. The restriction to allow communities to apply only every 15 years also reduces a community's flexibility in future planning. The existing 7 years is already a burden that can be hard to overcome, especially in unforeseen circumstances or projects.

I understand another proposed requirement is that a community address and fix its entire system at one time. That can be unduly cumbersome. Staging of repairs and improvements in phases tends to allow more level rate adjustments for citizens; a complete overhaul of a community's system could result in huge rate increases upfront for consumers rather than gradual, staged increases over time.

Please review the proposed plan to remove these new restrictions. Thank you for your consideration.

Sincerely,

Mayor

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MAY 06 2013

Joseph (Joe) Wellman, Mayor
Ph. (812) 254-5575 • Fax (812) 254-8223
mayor@washingtonin.us • www.washingtonin.us
Municipal Bldg. • 200 Harned Ave. • Washington, IN 47501

May 9, 2013

The Honorable Joseph Wellman
Mayor of Washington
Municipal Building
200 Harned Drive
Washington, IN 47501

Dear Mayor Wellman:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

City of Monticello

Kenneth P. Houston
Mayor

...together, we are making a great community greater

April 26, 2013

Indiana Office of Community and Rural Affairs
One North Capital
Suite 600
Indianapolis, IN 46204-2027
Attention: Lieutenant Governor Sue Ellspermann

RE: 2013 Consolidated Plan

Dear Lieutenant Governor Ellspermann,

I would like to take this opportunity to submit comments on the State of Indiana's proposed 2013 Consolidated Action Plan on behalf of the City of Monticello

Water is our most valuable resource, and it is essential to maintaining our quality of life. Access to safe, reliable drinking water and wastewater sanitation services are basic, fundamental human rights. Here in Indiana, we fortunately are able to supply these services to our residents. The crucial and unseen hero of this story is the vast infrastructure — thousands of miles of water distribution and wastewater collection lines and countless storage, treatment, and distribution facilities — that treat and transport water for our use. These systems have worked silently for years, in some cases more than a century, without major interruptions.

We are rapidly approaching a critical time for our water infrastructure. Aging and outdated infrastructure threatens the ability of our community, and others throughout the state, to continue to supply safe, reliable drinking water and wastewater sanitation services to our residents. Failure of this critical infrastructure can be catastrophic. Without action, our communities face more frequent service disruptions, threats to public health, and increases in environmental pollution. We know that we need to invest in our infrastructure, but unfortunately, most communities do not have sufficient funds available to do so. Without support from our State, this crisis will only continue to grow.

Investing in our water infrastructure is also an investment in our economy. Every business and industry relies on our water and wastewater infrastructure. Pumping water accounts for approximately 7% of our nation's total electricity consumption, much of which is wasted due to aging infrastructure such as leaky pipes and inefficient pumps. Of the total domestic water usage, an estimated 46% is utilized by industry or industrial processes, and another 41% is used for agricultural purposes.

Furthermore, the Environmental Protection Agency (EPA) has estimated Indiana's 20 year water infrastructure investment needs are to be $13 billion. A recent study by the Associated General Contractors found that every $1 billion in infrastructure spending led to the creation of 28,500 jobs in the construction and construction-related industries. As a result, an estimated 371,600 jobs could potentially be created with this 20-year investment. According to the US Department of Treasury, 90% of infrastructure jobs created would be middle class jobs, defined as those between the 25th and 75th percentile of national distribution of wages. Visit www.waterisyourbusiness.org and

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APR 29 2013

227 NORTH MAIN • MONTICELLO, IN 47960 • 574-583-9889 • FAX 574-583-9244
www.monticelloin.gov

City of Monticello
Kenneth P. Houston
Mayor

...together, we are making a great community greater

www.waterforjobs.org for additional information on these figures and the impacts of water infrastructure on our economy.

The city of Monticello is facing approximately a $16 million dollar expenditure over the coming 6 years to comply with an agreed order with the Indiana Dept. of Environmental Management to comply with the City's long term control plan. The cost of the projects is expected to increase future sewer rates 50%. This could be quite a burden on certain segments of the City's population. Monticello is not the only city or town in this situation. Funding of these infrastructure projects will be beneficial by creating jobs, keeping wastewater and water rates within the budgets of many citizens, and keeping our lakes and streams clean.

Our water and wastewater infrastructure is the backbone upon which our society survives and prospers. Our communities are built on water, and we owe it to our current and future generations to invest in these systems. I applaud your organization's efforts to provide funding for water infrastructure, and I encourage you to consider expanding these efforts in the future. Investing in our water infrastructure improves the quality of life for all citizens, now and for generations to come.

Sincerely,

Kenneth Houston

Kenneth Houston, Mayor
City of Monticello
225 N. Main
Monticello, IN.
(574) 583-9889

INDIANA OFFICE OF
Community & Rural Affairs
Where Rural Matters

May 10, 2013

The Honorable Kenneth Houston
Mayor of Monticello
225 N. Main
Monticello, IN 47960

Dear Mayor Houston:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

May 2, 2013

Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027

Dear: Dax Norton, Executive Director

I have a few concerns I would like to address for the State Consolidated Plan.

Issue 1: Persons with disabilities are "priced out, shut out and segregated" from most affordable housing.

"Priced Out" report from the Technical Assistance Cooperative in Boston (www.tacinc.org) indicates that there is not one single bedroom apartment in the U.S. that a person with SSI Income can afford.

Recommendation for "Priced Out": Increase the availability of rental subsidies for those with SSI income levels through a variety of affordable housing programs (e.g., HOME Funds, Project-based Section 8 in Tax Credit Multi-family housing, Section 811, etc.)

Recommendation for "Shut Out": Assure compliance with fair housing accessibility standards in multi-family housing; continue incentives for 10% or more Section #504 accessible units; establish a threshold requirement for basic access or "visitability" in new construction of single family homes and townhomes.

Recommendation: "Segregated": Stop additional investments in affordable housing that separate "special needs group" into their own building or development, including persons with a history of homelessness. Provide strong incentives for individualized and dispersed housing within the context of a development, following the guidelines/requirements of the new Section #811 HUD program.

Support the development of an advisory group comprised of stakeholders to address the barriers to persons living in nursing homes and affiliated with Money Follows the Person to accessing the Section 8 vouchers available for housing. Maintain Section 8 preference while barriers are being addressed.

Issue 2: There are very high rates of uncovered discrimination in housing for African Americans, Hispanics and Persons with Disabilities in Central Indiana.

The Fair Housing Center of Central Indiana released the findings of a fair housing audit in Central Indiana These findings included:

- **Black apartment seekers experienced discrimination 82% of the time**
- **Differential treatment of Hispanic apartment seekers 70% of the time**
- **Accessibility barriers 73% of the time**

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Recommendation: Create a statewide fair housing testing program to "affirmatively further fair housing." Develop and require fair housing training for all IHCDA members & beneficiaries of funds, including local governments.

Issue 3: There are not a lot of visitable homes available to rent or buy in Indiana. I personally do not have a rental that is visitable and I find it hard to keep up with family and friends who can not visit with me or each other. We are a nation that is very sociable. It does not take that much to make sure all new home and apartment builds are visitable.

Recommendation: Make a threshold that all new construction is visitable.

Issue 4: There are not a lot of "Livable Communities" in Indiana. I would like the opportunity to walk to shop, bank, eat in restaurants, and attend community activities. currently there are not a lot of safe travel paths. No sidewalks, overrun sidewalks, or sidewalks those are not wide enough for even a stroller is the biggest problem.

Recommendation: Do a Livable Community study and implement suggested alterations. The study will give you the information as to where the worst areas are in any city. This would help every person to have a healthier choice to riding in cars and also help those who are not able to drive.

Thank you for the opportunity to give feedback.
Sincerely,

Lisa Poole

Lisa Poole
3904 Newport Avenue Apt #11
Fort Wayne, IN 46805
260.482.2868
prinkayla@frontier.com

INDIANA OFFICE OF
Community & Rural Affairs
Where Rural Matters

May 10, 2013

Ms. Lisa Poole
3904 Newport Avenue, Apt. # 11
Fort Wayne, IN 46805

Dear Ms. Poole:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

May 2, 2013

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Indiana Office of Community and Rural Affairs
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Recommendation: Do a Livable Community study and implement suggested alterations. The study will give you the information as to where the worst areas are in any city. This would help every person to have a healthier choice to riding in cars and also help those who are not able to drive.

Thank you for the opportunity to give feedback.

Sincerely,

Anne Palmer

Anne Palmer
2815 Thompson Ave
Fort Wayne IN 46807
260.456.1447
Email: apalmer1900@aol.com

INDIANA OFFICE OF
Community & Rural Affairs
Where Rural Matters

May 10, 2013

Ms. Anne Palmer
2815 Thompson Ave.
Fort Wayne, IN 46807

Dear Ms. Palmer:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

Please consider the environment before printing this e-mail.

From: Tina Henderson [tinah@mendenhallgrants.com]
Sent: Monday, May 06, 2013 10:55 AM
To: Dawson, Beth
Subject: Consolidation Plan Comment

Dear State of Indiana:

I would like to comment on the State Of Indiana's Consolidated Plan.

My comment on the water and sewer funding pertains to the local match. I hope you consider opening it up to Section 108 loans as well as local bank loans. Most of the time the communities that use local bank loans like the shorter loan terms instead of financing that locks them into a 20 to 40 year commitment.

Thank you,
Tina Henderson

From: Dawson, Beth
Sent: Friday, May 10, 2013 9:31 AM
To: tinah@mendenhallgrants.com
Subject: Con Plan comments
Attachments: Henderson.doc

May 10, 2013

Ms. Tina Henderson
Via Email: tinah@mendenhallgrants.com

Dear Ms. Henderson:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

Dawson, Beth

From:	Debbie Bennett-Stearsman [DBennett@southwestindiana.org]
Sent:	Tuesday, May 07, 2013 1:39 PM
To:	Dawson, Beth
Cc:	Weissenberger, Kathleen A.
Subject:	2013 Action Plan for State of Indiana
Attachments:	EDCSWI Comment Letter.pdf
Follow Up Flag:	Follow up
Flag Status:	Flagged

Please accept the same as comments to the F/Y 2013 Action Plan for the State of Indiana Consolidated Plan.

Thank you.

Debra Bennett-Stearsman
Vice President, Community Development

ECONOMIC DEVELOPMENT COALITION

Economic Development Coalition of Southwest Indiana
318 Main Street, Suite 400
Evansville, IN 47708
P: 812-423-2020
F: 812-423-2080
Cell: 812-549-5335

www.southwestindiana.org

ONE REGION-ONE ECONOMY-ONE VOICE

ECONOMIC DEVELOPMENT COALITION OF SOUTHWEST INDIANA

One Region — One Economy — One Voice

318 Main Street, Suite 400
Evansville, Indiana 47708
Phone 812-423-2020 Fax 812-423-2080
www.southwestindiana.org

May 7, 2013

Ms. Kathleen Weissenberger
Indiana Office of Community and Rural Affairs
Community Development Division
One North Capitol, Suite 600
Indianapolis, IN 46204

RE: 2013 State of Indiana Action Plan

This letter is in response to the State of Indiana's proposed Action Plan for the 2013 Consolidated Plan which includes allocation of CDBG grant funding for F/Y 13.

Our organization represents four counties in the Southwest corner of the State of Indiana – Gibson, Posey, Vanderburgh and Warrick. The cities, towns, sewer districts, water corporations, libraries, fire departments, township trustees as well as county government in our region have been successful in receiving over $50M in grant funding in the last five years from grant opportunities offered by this program. We are very pleased with the successful management and distribution of funding offered by the State. In fact in many cases this is the only grant opportunity for our communities. We commend the hard work of Kathleen Weissenberger and her staff in the plan and distribution of funding opportunities and encourage the state to continue in the direction chosen for the future.

However, we would like to make the following suggestions and/or comments regarding the proposed 2013 plan:

1. We are pleased with the various cycles of funding for calendar year 2013. This gives communities the opportunity to submit applications in a timely fashion. We would agree that in this fiscal year and future years the programs and opportunities continue to be broken down in the categorical cycles and suggest that the Program application due dates be broken down into quarterly or bi-monthly cycles not due at the same time in a given year affording the grant administrators as well as the communities the proper time to prepare a successful grant application. Maximum successful grants open at any given time should not exceed two for cities and towns, and three for counties.

2. We do NOT concur with the Water/Waste Water Improvements Program as suggested in the plan. Our main concern lies with tying the grant opportunity with ONLY the State Revolving Fund and USDA Rural Development as local match. This is due to the following:

a. Timing on approval of PERs for each agency with OCRA funding cycles. In many instances this could cause a community to wait an additional year to apply for funding.

b. Each agency has a different PER requirements which causes additional soft costs to be incurred by communities in preparing the PER. This would not be necessary if the communities use local reserve funds on hand or funding given by a sponsor agency, or other, for match dollars.

c. Additional soft costs will be incurred by communities due to the requirement of bond counsel and rate consultants for SRF and USDA. This increases project costs. This would not be necessary if the communities use local reserve funds on hand or funding given by a sponsor agency, or other, for match dollars.

d. Use of either the SRF or USDA program as match will result in rate increases to communities in order to provide the collateral required for the loan required by the agencies. This would not be necessary if the communities use reserve funds on hand or funding given by a sponsor agency, or other, for match dollars.

e. The proposed "tier" of funding distribution as listed in the Program is unfair. For instance, if a community is in the Tier I category because it is HUD Census automatic LMI community it will fall within the lowest available funding opportunity. However, if a community that is, for example, HUD Census 45% LMI and an income study is conducted to qualify, the results of the survey must be 55 LMI percentage or above placing them in the Tier II and Tier III to qualify for grant funding. This would force HUD Census automatic LMI communities to conduct income surveys when they already qualify. It appears the State is going against assisting automatic LMI communities.

f. The SRF and USDA program does not allow for payment of administration of loan dollars. This is generally incurred by grant administrators. Grant administration is capped at 8%. This amount is not sufficient to administer both programs. We suggest raising the administration fee allowed by CDBG grant funding to 10% when matched with SRF and USDA.

g. We suggest that this Program be revised and allow a community to use local funds on hand, a bank loan, sponsor or other cash as match for this

Program. It is understood that the purpose of the Program is to encourage communities to make a comprehensive fix to a problem and to develop a reserve plan to sustain the system for the future with repeated request for grant funding. A potential solution would be to allow a community one utility funding opportunity every 15 years.

3. We are pleased that the State is proposing a loan program for communities in order to create additional funding for economic and community development projects. We suggest that the State allow this loan pool to serve as local match for all individual grant opportunities listed in the Action Plan. This appears to be an innovative plan to offer to the communities.

Again, thank you for this opportunity to comment. We commend the hard work of the State to provide assistance to our communities.

Sincerely,

Debra Bennett-Stearsman
Vice President, Community Development

Wylie Zeigler
Wylie Zeigler, Manager
Grant Development

Megan Southwell
Megan Southwell
Community Development Specialist

From: Dawson, Beth
Sent: Friday, May 10, 2013 9:33 AM
To: dbennett@southwestindiana.org
Subject: Consolidated Plan
Attachments: Bennett.doc

May 10, 2013

Ms. Debbie Bennett
Via Email: dbennett@southwestindiana.org

Dear Ms. Bennett:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

From: Jackie Evans [jackie@atticindiana.org]
Sent: Wednesday, May 08, 2013 1:15 PM
To: Dawson, Beth; Sipe, Jacob
Subject: Con Plan

Date:05/08/2013

Re: Consolidated Plan

Dear Mr. Sipe and Ms. Dawson,

I am writing to give input into the Consolidated Plan. I have summarized barriers to integrated, affordable and accessible housing for persons with disabilities and identified recommended actions or proposed solutions for each barrier.

Barrier # 1. People with SSI income levels cannot afford "affordable housing."

Solution #1.

- Make more units affordable to people at 30% or lower Area Median Income by developing incentives for affordable housing developers. Conversion of Section 8 vouchers to project based Section 8 within Tax Credit properties is another avenue to increase the available housing for those with SSI incomes, especially when the tenant can then use this voucher to move to another affordable unit, if preferred.

- Designate the use of Tenant Based Rental Assistance (TBRA) for: 1). assisting persons to move out of nursing homes, and; 2). to assist with the high cost of Section #504 accessible units. TBRA could be replaced by funding through the Section 8 Housing Choice Voucher program when the person's name came up on the IHCDA Section 8 Waitlist. Historically most HOME dollars have substantially benefited homebuyers and developers of multi-family housing. I am asking that a fair share of HOME funds be allocated for persons with very low income.

- Use a percentage of all Con Plan related funding to assist persons exit institutions with access to integrated, affordable housing within communities and housing of choice.

Barrier #2. Newly constructed or renovated housing is not accessible.

Solution #2.

- Make all new construction of single family homes & townhouses usable for all by adopting visitability standards as a requirement (unless topography of land prohibits these design features).

- Assure that home modifications funds are available for making appliances accessible for persons with sensory/mobility disabilities.

- Enforce fair housing accessibility standards (e.g. lower light switches, door handles vs. knobs; wider doors, turning space in bath & kitchen).

- Maintain incentives for tax credit properties that use federal housing dollars to increase the number of Section 504 units beyond the 5% minimum.

Barrier #3. Existing programs/providers do not practice scattered site or individualized and dispersed (integrated) housing.

Solution #3

- Develop accessible units across the state to increase the options of where to live.

- Options are often limited to segregated housing where others with disabilities or seniors live.

- Do not differentiate persons with disabilities by type of disability in housing, surveys, agency literature.

- Educate landlords that having persons with disabilities is not "scary" or a liability.

- Enforce fair housing law and provide education on fair housing accommodations and modifications.

- Do not develop any new housing that separates persons with disabilities, including those with a history of homelessness.

–

Barrier #4. The highest rate of fair housing discrimination complaints are received from persons with disabilities.

Solution #4

- Enforce fair housing law and educate <u>all</u> on fair housing reasonable accommodations and modifications.

- Make sure that people who are renting are given information (written and in tenant meetings) about fair housing law and procedures about filing complaints about fair housing discrimination.

- Require landlords/property managers to attend fair housing seminars on a regular basis.

- Fund/create a fair housing testing program. Report publicly testing results and enforcement actions.

Thank you for this opportunity,

Jackie Evans
ATTIC, INC.
Back Home in Indiana Alliance

From: Dawson, Beth
Sent: Friday, May 10, 2013 9:35 AM
To: Jackie Evans
Subject: Con Plan
Attachments: Evans.doc

May 10, 2013

Ms. Jackie Evans
Via Email: Jackie@atticindiana.org

Dear Ms. Evans:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

From: Beverly Harding [advocacycoordbah@yahoo.com]
Sent: Wednesday, May 08, 2013 4:12 PM
To: Dawson, Beth
Subject: Re; Consolidation Plan

May 7, 2013
Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol - Suite #600
Indianapolis, IN 46204-2027

Dear: Ms Dawson,

Sorry I was unable to make the last meeting, but I will write a letter with some concerns I have as a Back Home In Indiana member.

Issue 1: Persons with disabilities are "priced out, shut out and segregated" from most affordable housing.
"Priced Out" report from the Technical Assistance Cooperative in Boston (www.tacinc.org) indicates that there is not one single decent, affordable bedroom apartment in the U.S. that a person with a fixed income like Social Security Supplemental Income or Social Security Disability Income can afford.
Recommendation for "Priced Out": Increase the availability of rental subsidies for those on fixed incomes through a variety of affordable housing programs (e.g., HOME Funds, Project-based Section 8 in Tax Credit Multi-family housing, Section 811, etc.)
Recommendation for "Shut Out": Assure compliance with fair housing accessibility standards in multi-family housing; continue incentives for at least 10% or more Section 504 accessible units; establish a basic requirements for basic access or "visitability" in new construction of single family homes and town homes.
Recommendation: "Segregated": Stop additional investments in affordable housing that separate "special needs group" into their own building or development, including persons with a history of homelessness. Provide strong incentives for individualized and dispersed housing within the context of a development, following the guidelines/requirements of the new Section #811 HUD program.
Establish an advisory group comprised of stakeholders to address the barriers to persons living in nursing homes and affiliated with Money Follows the Person so accessing the Section 8 vouchers will be readily available for housing. Maintain and expand Section 8 while barriers are being addressed.

Issue 2: There are very high rates of uncovered discrimination in housing for African Americans, Hispanics and Persons with Disabilities in Central Indiana.
The Fair Housing Center of Central Indiana released the findings of a fair housing audit in Central Indiana These findings included:
- Black apartment seekers experienced discrimination 82% of the time
- Differential treatment of Hispanic apartment seekers 70% of the time
- Accessibility barriers 73% of the time
Recommendation: Expand a statewide fair housing testing program to "affirmatively further fair housing." Develop and require fair housing training and diversity training if necessary for all IHCDA members & beneficiaries of funds, including local governments.

Issue 3: Make more "Livable Communities" in Indiana. Like in Litton, IN. It would be wonderful if all had the opportunity to walk to shops, banks, eat in restaurants, and attend community activities in an accessible city, where everyone would be neighbors looking out for each other

and displaying how our neighborhood is concerned with visitability being a model neighborhood for others.
Recommendation: A group to study and use the Litton project as a template to establish other liveable neighborhoods.
Thank you for the opportunity to lend my concerns to you

Respectfully Submitted,

Beverly Harding, Advocate Coordinator
The League for the Blind and Disabled/Back Home in Indiana
5821 South Anthony Blvd.
Fort Wayne, IN 46816

From: Dawson, Beth
Sent: Friday, May 10, 2013 9:53 AM
To: 'Beverly Harding'
Subject: Con Plan
Attachments: Harding.doc

May 10, 2013

Ms. Beverly Harding
Via Email: advocacycoordbah@yahoo.com

Dear Ms. Harding:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

From: Julia Whitson [julia@mattisoncorp.com]
Sent: Thursday, May 09, 2013 1:39 PM
To: Dawson, Beth
Subject: Consolidated Plan Comments
Attachments: IOCRA_Letter.pdf

Good afternoon,

I left a voicemail but also wanted to follow up by email should that be more convenient for you. The Indiana Water Environment Association (IWEA) would like to submit the attached comments for the 2013 Consolidated Plan. I wasn't sure if comments were permitted to be sent in by email or not. If not, I'd be happy to bring a copy by your office before the close of business tomorrow. If you could let me know either way, that would be great.

Thank you!

INDIANA Water Environment Association
Julia Whitson
Association Manager
Indiana Water Environment Association

200 South Meridian Street, Suite 410 | Indianapolis, IN 46225
Office: 317.686.2664 | Cell: 765.620.0153 | Fax: 317.686.2672

IWEA Annual Conference – *November 20-22, 2013 – Westin Indianapolis*

INDIANA
Water
Environment
Association

200 South Meridian Street, Suite 410
Indianapolis, Indiana 46225
indianawea.org
P: (317)686-2664

Annual Conference - November 20-22, 2013 - Westin Indianapolis
Preserving Our Water. Protecting Our Future.

May 7, 2013

Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027

RE: 2013 Consolidated Plan

To Whom it May Concern:

I would like to take this opportunity to submit comments on the State of Indiana's proposed 2013 Consolidated Action Plan on behalf of The Indiana Water Environment Association (IWEA). IWEA is a professional organization comprised of approximately 1,300 members state-wide working in the wastewater/water field. Our organization is *dedicated to preserving and protecting Indiana's waterways through educating our members and the citizens of Indiana about the importance of our water environment.* More information about our organization can be found at www.indianawea.org.

Water is our most valuable resource, and it is essential to maintaining our quality of life. Access to safe, reliable drinking water and wastewater sanitation services are basic, fundamental human rights. Here in Indiana, we fortunately are able to supply these services to our residents. The crucial and unseen hero of this story is the vast infrastructure — thousands of miles of water distribution and wastewater collection lines and countless storage, treatment, and distribution facilities — that treat and transport water for our use. These systems have worked silently for years, in some cases more than a century, without major interruptions.

We are rapidly approaching a critical time for our water infrastructure. Aging and outdated infrastructure threatens the ability of our community, and others throughout the state, to continue to supply safe, reliable drinking water and wastewater sanitation services to our residents. Failure of this critical infrastructure can be catastrophic. Without action, our communities face more frequent service disruptions, threats to public health, and increases in environmental pollution. We know that we need to invest in our infrastructure, but unfortunately, most communities do not have sufficient funds available to do so. Without support from our State, this crisis will only continue to grow.

Investing in our water infrastructure is also an investment in our economy. Every business and industry relies on our water and wastewater infrastructure. Pumping water accounts for approximately 7% of our nation's total electricity consumption, much of which is wasted due to aging infrastructure such as leaky pipes and inefficient pumps. Of the total domestic water usage, an estimated 46% is utilized by industry or industrial processes, and another 41% is used for agricultural purposes.

Furthermore, the Environmental Protection Agency (EPA) has estimated Indiana's 20 year water infrastructure investment needs are to be $13 billion. A recent study by the Associated General Contractors found that every $1 billion in infrastructure spending led to the creation of 28,500 jobs in the construction and construction-related industries. As a result, an estimated 371,600 jobs could potentially be created with this 20-year investment. According to the US Department of Treasury, 90% of infrastructure jobs created would be middle class jobs, defined as those between the 25th and 75th percentile of national distribution of wages. Visit www.waterisyourbusiness.org and www.waterforjobs.org for additional information on these figures and the impacts of water infrastructure on our economy.

Our water and wastewater infrastructure is the backbone upon which our society survives and prospers. Our communities are built on water, and we owe it to our current and future generations to invest in these systems. I applaud your organization's efforts to provide funding for water infrastructure, and I encourage you to consider expanding these efforts in the future. Investing in our water infrastructure improves the quality of life for all citizens, now and for generations to come.

Sincerely,

Gary Merriman

Gary Merriman
President
Indiana Water Environment Association

Jessica S. Bastin

Jessica S. Bastin, PE
President-Elect
Indiana Water Environment Association

From: Dawson, Beth
Sent: Friday, May 10, 2013 9:58 AM
To: Julia Whitson
Subject: Con Plan

May 10, 2013

Ms. Julia Whitson
Via Email: julia@mattisoncorp.com

Dear Ms. Whitson:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

From: Weissenberger, Kathleen A.
Sent: Thursday, May 09, 2013 3:29 PM
To: Dawson, Beth
Subject: Consolidated Plan Comments
Attachments: Consolidated Plan Comments.doc

From: Susan Craig [mailto:susan.craig@sirpc.org]
Sent: Thursday, May 09, 2013 2:25 PM
To: 'Weissenberger, Kathleen A.'
Subject: Consolidated Plan Comments

Hi Kathleen-

Attached are my comments - sorry I couldn't resist getting on my soapbox a bit. I have done this work for so long, that I am very passionate about helping small communities - I tried not to get carried away!

Thanks so much for giving all of us a chance to offer our input - I know you have a tough job and appreciate everything you do. Thanks Kathleen!

Susan

Susan Craig, Executive Director
Southeastern Indiana Regional Planning Commission
P.O. Box 765
Versailles, Indiana 47042
Phone: 812-689-5505 Fax: 812-689-3526
susan.craig@sirpc.org
Web Site: www.sirpc.org

Office of Community & Rural Affairs
Consolidated Plan Input

In my 30+ years of experience working with the CDBG program, funds spent towards water, wastewater and storm drainage make incalculable impact on small Indiana communities.

In fact, many of the community benefits I have witnessed over the years are incalculable. I have seen senior citizen centers, community centers, and libraries funded with CDBG funds change the entire fabric of communities where many would write off as not having anything going for them.

CDBG funds have provided the needed impetus for improvement to so many small communities. While I realize that as custodians of public funds, we must be responsive to insuring the wisdom of each dollar invested into CDBG projects, I am concerned that there seems to be a growing mentality of viewing the program as strictly business.

The CDBG program has been an incredible tool to help revitalize small impoverished communities. Sometimes a community center, a senior center, or a library, just may be the spark that starts the fire. Can we measure this? Yes, we can, but if we rely only on numbers we are doing a serious disservice to the intent of the CDBG program and those who it was meant to help.

The proposed tiered structure, and the proposed SRF/and or RD participation requirement severely limits the flexibility, as well as the accessibility of these program funds to small communities.

From my experience working with small communities, I have witnessed the success of small infrastructure projects that "fixed' the system's problems. I have also witnessed the torture communities must endure when navigating multiple funding sources (outside of local match). I would not, in good conscience recommend utilizing multiple outside governmental funding sources unless absolutely necessary. Which, of course, it often is. But requiring RD or SRF participation will hinder the progress of many small communities.

I was glad to see that the Stellar program will be "tightened up". At the risk of being politically incorrect, I am not a big fan of this program. Investing large amounts of funds into a few communities does not seem to make sense when funds are limited. There are many communities that do not have the resources to compete in this program and it is certainly not anything close to a level playing field.

I understand the concerns of those who ask , "where is the private investment?" This is certainly responsible and needs to be addressed. However, it has always been my understanding that CDBG funds are to serve community needs the community is unable to address on their own. In my experience, more times than not – these needs are related to infrastructure. Infrastructure should always, in my opinion, receive the majority of funding from the program.

I appreciate the challenges involved in developing a fair and responsible method of distributing CDBG funds. I am sure that the cuts in the program make this job even more difficult, and I certainly don't envy those who are charged with this responsibility. I do appreciate the opportunity to provide my comments and opinions. Thank you.

From: Dawson, Beth
Sent: Friday, May 10, 2013 10:00 AM
To: susan.craig@sirpc.org
Subject: Con Plan

May 10, 2013

Ms. Susan Craig
Via Email: susan.craig@sirpc.org

Dear Ms. Craig:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

Dawson, Beth

To: Cynthia Hyde
Subject: RE: Events You Can't Miss & How You Can Support Infrastructure Funding

From: Cynthia Hyde [mailto:tceahyde@yahoo.com]
Sent: Thursday, May 09, 2013 7:13 PM
To: Dawson, Beth
Subject: Fw: Events You Can't Miss & How You Can Support Infrastructure Funding

Hello Beth,

Thank you so much for the e-mail. I did mail the "hard" copy this morning, in hopes that it would reach your office by the deadline. I am glad to be able to send a digital copy via e-mail.

Thanks again,
Cynthia D. Hyde,
Town of Spencer

Town Of Spencer
Founded February 12, 1820
Municipal Building
90 N. West Street , Spencer, Indiana 47460
Phone 812-829-3213 Fax 812-829-1567

May 9, 2013

Indiana Office of Community and Rural Affairs
One North Capital
Suite 600
Indianapolis, IN 46204-2027
Attention: Kathleen Weissenberger

RE: 2013 Consolidated Plan

Dear Ms. Weissenberger:

I would like to take this opportunity to submit comments on the State of Indiana's proposed 2013 Consolidated Action Plan on behalf of Town of Spencer.

Water is our most valuable resource, and it is essential to maintaining our quality of life. Access to safe, reliable drinking water and wastewater sanitation services are basic, fundamental human rights. Here in Indiana, we fortunately are able to supply these services to our residents. The crucial and unseen hero of this story is the vast infrastructure – thousands of miles of water distribution and wastewater collection lines and countless storage, treatment, and distribution facilities – that treat and transport water for our use. These systems have worked silently for years, in some cases more than a century, without major interruptions.

We are rapidly approaching a critical time for our water infrastructure. Aging and outdated infrastructure threatens the ability of our community, and others throughout the state, to continue to supply safe, reliable drinking water and wastewater sanitation services to our residents. Failure of this critical infrastructure can be catastrophic. Without action, our communities face more frequent service disruptions, threats to public health, and increases in environmental pollution. We know that we need to invest in our infrastructure, but unfortunately, most communities do not have sufficient funds available to do so. Without support from our State, this crisis will only continue to grow.

Investing in our water infrastructure is also an investment in our economy. Every business and industry relies on our water and wastewater infrastructure. Pumping water accounts for approximately 7% of our nation's total electricity consumption, much of which is wasted due to aging infrastructure such as leaky pipes and inefficient pumps. Of the total domestic water usage, an estimated 46% is utilized by industry or industrial processes, and another 41% is used for agricultural purposes.

Furthermore, the Environmental Protection Agency (EPA) has estimated Indiana's 20 year water infrastructure investment needs are to be $13 billion. A recent study by the Associated General Contractors found that every $1 billion in infrastructure spending led to the creation of 28,500 jobs in the construction and construction-related industries. As a result, an estimated 371,600 jobs could potentially be created with this 20-year investment. According to the US Department of Treasury, 90% of infrastructure jobs created would be middle class jobs, defined as those between the 25th and 75th percentile of national distribution of wages. Visit www.waterisyourbusiness.org and www.waterforjobs.org for additional information on these figures and the impacts of water infrastructure on our economy.

The Town of Spencer has recently completed a waste/storm water plan utilizing OCRA planning grant funds, and subsequently DR2 funding to completed the first of seven projects identified by the engineering study. If there were additional funds available for water infrastructure projects we could be more proactive in addressing needs. When utilizing grant funding for such projects, it is often several years later when subsequent grant applications become competitive and receive requested funding, leaving many projects unfinished. The addition funding opportunities could possibly allow our community to plan rehabilitation projects on an annual basis and therefore avoid many issues before they seriously impact community residents. This would be more cost effective than waiting for some type of catastrophic failure, requiring a large and very expensive remedy. These projects are extremely expensive for small communities such as ours to complete, and are often impossible to fund wholly through local revenue. If funding could be structured to allow for smaller, but more frequent projects, as opposed to large projects every few years, this would increase the stability of local employment, increase consumer dollars in the local economy, and provide a more sustainable positive impact on local tax revenues.

Our water and wastewater infrastructure is the backbone upon which our society survives and prospers. Our communities are built on water, and we owe it to our current and future generations to invest in these systems. I applaud your organization's efforts to provide funding for water infrastructure, and I encourage you to consider expanding these efforts in the future. Investing in our water infrastructure improves the quality of life for all citizens, now and for generations to come.

Sincerely,

Cynthia D. Hyde

Cynthia D. Hyde, President
Spencer Town Council

From: Dawson, Beth
Sent: Friday, May 10, 2013 10:03 AM
To: Cynthia Hyde
Subject: Con Plan

May 10, 2013

Ms. Cynthia Hyde
Via Email: tceahyde@yahoo.com

Dear Ms. Hyde:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

From: Traci Taylor [tracit@ilcein.org]
Sent: Thursday, May 09, 2013 5:49 PM
To: Dawson, Beth; Sipe, Jacob
Subject: Input for the Consolidated Plan-Action Plan
Attachments: ConPlan Email 2013.doc

Dear Ms. Dawson and Mr. Sipe,
Please find the attached letter of input for the Consolidate Plan.
Thank you very much for your time.
Traci Taylor

Traci Taylor
Director of Independent Living Services
Independent Living Center of Eastern Indiana
1818 West Main Street
Richmond, Indiana
-47374-
(765) 939-9226 Ext 102

Date: May 9, 2013

Re: Consolidated Plan

Dear Mr. Sipe and Ms. Dawson,

I am writing to give input into the Consolidated Plan. I have summarized barriers to integrated, affordable and accessible housing for persons with disabilities and identified recommended actions or proposed solutions for each barrier.

Barrier # 1. People with SSI income levels cannot afford "affordable housing."

Solution #1.

- Make more units affordable to people at 30% or lower Area Median Income by developing incentives for affordable housing developers. Conversion of Section 8 vouchers to project based Section 8 within Tax Credit properties is another avenue to increase the available housing for those with SSI incomes, especially when the tenant can then use this voucher to move to another affordable unit, if preferred.

- Designate the use of Tenant Based Rental Assistance (TBRA) for: 1). assisting persons to move out of nursing homes, and; 2). to assist with the high cost of Section #504 accessible units. TBRA could be replaced by funding through the Section 8 Housing Choice Voucher program when the person's name came up on the IHCDA Section 8 Waitlist. Historically most HOME dollars have substantially benefited homebuyers and developers of multi-family housing. I am asking that a fair share of HOME funds be allocated for persons with very low income.

- Use a percentage of all ConPlan related funding to assist persons exit institutions with access to integrated, affordable housing within communities and housing of choice.

Barrier #2. Newly constructed or renovated housing is not accessible.

Solution #2.

- Make all new construction of single family homes & townhouses usable for all by adopting visitability standards as a requirement (unless topography of land prohibits these design features).
- Assure that home modifications funds are available for making appliances accessible for persons with sensory/mobility disabilities.
- Enforce fair housing accessibility standards (e.g. lower light switches, door handles vs. knobs; wider doors, turning space in bath & kitchen).
- Maintain incentives for tax credit properties that use federal housing dollars to increase the number of Section 504 units beyond the 5% minimum.

Barrier #3. Existing programs/providers do not practice scattered site or individualized and dispersed (integrated) housing.

Solution #3

- Develop accessible units across the state to increase the options of where to live.
- Options are often limited to segregated housing where others with disabilities or seniors live.
- Do not differentiate persons with disabilities by type of disability in housing, surveys, agency literature.
- Educate landlords that having persons with disabilities is not "scary" or a liability.
- Enforce fair housing law and provide education on fair housing accommodations and modifications.
- Do not develop any new housing that separates persons with disabilities, including those with a history of homelessness.
-

Barrier #4. The highest rate of fair housing discrimination complaints are received from persons with disabilities.

Solution #4

- Enforce fair housing law and educate all on fair housing reasonable accommodations and modifications.
- Make sure that people who are renting are given information (written and in tenant meetings) about fair housing law and procedures about filing complaints about fair housing discrimination.
- Require landlords/property managers to attend fair housing seminars on a regular basis.
- Fund/create a fair housing testing program. Report publicly testing results and enforcement actions.

Thank you for this opportunity,

Traci Taylor
tracit@ilcein.org

From: Dawson, Beth
Sent: Friday, May 10, 2013 10:05 AM
To: tracit@ilcein.org
Subject: Con Plan

May 10, 2013

Ms. Traci Taylor
Via Email: tracit@ilcein.org

Dear Ms. Taylor:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

From: Ann Barnhart [AnnB@ilcein.org]
Sent: Thursday, May 09, 2013 5:12 PM
To: Dawson, Beth; Sipe, Jacob
Subject: Input on Consolidated Plan

Dear Mr. Sipe and Ms. Dawson,

I am writing to give input into the Consolidated Plan. I have summarized barriers to integrated, affordable and accessible housing for persons with disabilities and identified recommended actions or proposed solutions for each barrier.

Barrier # 1. People with SSI income levels cannot afford "affordable housing."

Solution #1.

- Make more units affordable to people at 30% or lower Area Median Income by developing incentives for affordable housing developers. Conversion of Section 8 vouchers to project based Section 8 within Tax Credit properties is another avenue to increase the available housing for those with SSI incomes, especially when the tenant can then use this voucher to move to another affordable unit, if preferred.

- Designate the use of Tenant Based Rental Assistance (TBRA) for: 1). assisting persons to move out of nursing homes, and; 2). to assist with the high cost of Section #504 accessible units. TBRA could be replaced by funding through the Section 8 Housing Choice Voucher program when the person's name came up on the IHCDA Section 8 Waitlist. Historically most HOME dollars have substantially benefited homebuyers and developers of multi-family housing. I am asking that a fair share of HOME funds be allocated for persons with very low income.

- Use a percentage of all ConPlan related funding to assist persons exit institutions with access to integrated, affordable housing within communities and housing of choice.

I receive SSI and when I was looking for an apartment it was very difficult to find housing that was accessible and within my budget.

Barrier #2. Newly constructed or renovated housing is not accessible.

Solution #2.

- Make all new construction of single family homes & townhouses usable for all by adopting visitability standards as a requirement (unless topography of land prohibits these design features).
- Assure that home modifications funds are available for making appliances accessible for persons with sensory/mobility disabilities.
- Enforce fair housing accessibility standards (e.g. lower light switches, door handles vs. knobs; wider doors, turning space in bath & kitchen).
- Maintain incentives for tax credit properties that use federal housing dollars to increase the number of Section 504 units beyond the 5% minimum.

Barrier #3. Existing programs/providers do not practice scattered site or individualized and dispersed (integrated) housing.

Solution #3

- Develop accessible units across the state to increase the options of where to live.
- Options are often limited to segregated housing where others with disabilities or seniors live.
- Do not differentiate persons with disabilities by type of disability in housing, surveys, agency literature.
- Educate landlords that having persons with disabilities is not "scary" or a liability.
- Enforce fair housing law and provide education on fair housing accommodations and modifications.
- Do not develop any new housing that separates persons with disabilities, including those with a history of homelessness.

Most of the Section 8 housing for people with disabilities that I am aware of in Richmond is segregated.

Barrier #4. The highest rate of fair housing discrimination complaints are received from persons with disabilities.

Solution #4

- Enforce fair housing law and educate <u>all</u> on fair housing reasonable accommodations and modifications.
- Make sure that people who are renting are given information (written and in tenant meetings) about fair housing law and procedures about filing complaints about fair housing discrimination.
- Require landlords/property managers to attend fair housing seminars on a regular basis.

- Fund/create a fair housing testing program. Report publicly testing results and enforcement actions.

Thank you for this opportunity,

Ann Barnhart
219 N 11th St
Richmond, IN 47374
765-967-0940
annb@ilcein.org

From: Dawson, Beth
Sent: Friday, May 10, 2013 10:07 AM
To: annb@ilcein.org
Subject: Con Plan

May 10, 2013

Ms. Ann Barnhart
Via Email: AnnB@ilcein.org

Dear Ms. Barnhart:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

From: Andrew Brockman [brockman.a@gmail.com]
Sent: Friday, May 10, 2013 8:54 AM
To: Dawson, Beth; Sipe, Jacob
Subject: Consolidated Plan input
Attachments: Con Plan letter.doc

Hello:

Please see the attachment for my input to the consolidated plan for housing. Let me know if you have any questions or need clarification.

--
Andrew Brockman
cell: 513-607-3221
brockman.a@gmail.com

Dear Mr. Sipe and Ms. Dawson,

I am writing you today to inform you of a few barriers to fair housing and how I think these issues can be addressed so that the Consolidated Plan affirmatively furthers the cause of fair housing.

#1: People with SSI income cannot afford 'affordable' housing, thus the cycle of poverty is never broken.
- Solution: make more housing available for SSI recipients through offering more subsidized housing at or below 30% of the area median income. Offer incentives for developers, and offer more tenant based rental assistance for residents who depend on SSI income.

#2 New construction is not accessible to those with disabilities
- Solution: Provide more opportunities for developers to learn about the disability community and their needs. Once educated, require those developers to meet certain construction requirements for single family and multi-family units, and of course, of the utmost importance, <u>enforce</u> the current and any new laws!

#3 Most affordable and accessible housing that currently exists is segregated and not integrated.
Solution: Build more scattered site and integrated new buildings. Enforce all existing fair housing laws and do not separate and categorize individuals based on income, disability, etc.

#4 Most fair housing complaints come from people with disabilities.
Solution: Educate landlords and any individual selling or marketing properties on the fair housing laws, disability standards, and the ethics involved. Ensure standards through a testing program.

Thank you for this opportunity and I look forward to hearing from you.

From: Dawson, Beth
Sent: Friday, May 10, 2013 10:33 AM
To: brockman.a@gmail.com
Subject: Con Plan

May 10, 2013

Mr. Andrew Brockman
Via Email: brockman.a@gmail.com

Dear Mr. Brockman:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

From: Amber O'Haver [amlohaver@yahoo.com]
Sent: Friday, May 10, 2013 11:31 AM
To: Dawson, Beth
Cc: Sipe, Jacob
Subject: Consolidated Plan Input

Thank you for the opportunity to provide input into the Consolidated Plan. The following summarizes barriers to integrated, affordable and accessible housing for persons with disabilities and identifies recommended actions or proposed solutions for these barriers.

People with SSI income levels cannot afford "affordable housing." Therefore, a large majority of these individuals are faced with the fear of being or becoming homeless. They are often left with no choice but to look to institutions such as nursing homes and group homes for shelter where they can receive the care supports they need instead of remain in their communities, in their homes and receive these same care supports - And at much less expense to the state.

According to the Consortium for Citizens with Disabilities Housing Task Force, many people with significant and long-term disabilities who must rely on disability income face the desperation associated with not having a home in the community as a constant of daily life. In 2010, approximately 4.4 million adults with disabilities between the ages of 18 and 65 who relied on the federal Supplemental Security Income (SSI) program had incomes of less than $8,500 per year – low enough to be completely priced out of every single rental housing market in the country.

According to a report in 2010, *Priced Out*, there was not one state or community in the nation where a person with a disability receiving SSI could afford to rent modest rental housing without a permanent rental subsidy. Even rents for modest studio/efficiency apartments were virtually beyond the reach of people who relied on the SSI program. For the state of IN, it was found that it took 86% of an individual's SSI income, currently $710 a month, to pay for a 1-bedroom apartment. This leaves very little money for any utility, food, or medical expenditures due that month as well.

The following are a two proposed solutions addressing the housing needs of individuals living on SSI income.

- Make more units affordable to people at 30% or lower Area Median Income by developing incentives for affordable housing developers. Conversion of Section 8 vouchers to project based Section 8 within Tax Credit properties is another avenue to increase the available housing for those with SSI incomes, especially when the tenant can then use this voucher to move to another affordable unit, if preferred.

- Designate the use of Tenant Based Rental Assistance (TBRA) for: 1). assisting persons to move out of nursing homes, and; 2). to assist with the high cost of Section #504 accessible units. TBRA could be replaced by funding through the Section 8 Housing Choice Voucher program when the person's name came up on the IHCDA Section 8 Waitlist. Historically most HOME dollars have substantially benefited homebuyers and developers of multi-family housing. I am asking that a fair share of HOME funds be allocated for persons with very low income.

Thank you for your time in considering my comments for the Consolidated Plan.

Amber O'Haver
Ms. Wheelchair Indiana 2012

From: Dawson, Beth
Sent: Friday, May 10, 2013 11:34 AM
To: Amber O'Haver
Subject: Consolidated Plan Input

May 10, 2013

Ms. Amber O'Haver
Via Email: amlohaver@yahoo.com

Dear Ms. O'Haver:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

Dawson, Beth

From: Trena Carter [tcarter1@aracities.org]
Sent: Friday, May 10, 2013 11:34 AM
To: Dawson, Beth
Subject: Consolidated Plan - Indiana 2013 Action Plan/Written Comments

Good morning!

Please consider the following comments and concerns in regards to the draft Indiana 2013 Action Plan, OCRA CDBG 2013 Allocation Plan:

1. Concern: The Water/Wastewater Partnership Program penalizes communities that have been diligent in updating and maintaining their systems. If an income eligible community has taken out loans previously and other issues have become problems with the utility system; a community has been raising rates for operation and maintenance of their systems; and a community has saved sufficient funds that would match grant funds, yet not sufficient to fund the needed improvements, they would not be able to apply for assistance through this program. Having debt as a requirement 100% of the time does not seem equitable to all the rural communities. If the project is comprehensive and addresses the system's problems
2. Comment: When reviewing the annual distress numbers, comparing the boundaries for service area of project beneficiaries and the boundaries of the area included in the distress scores, there seems to be a bit of a disconnect. For instance, does the distress score for a township, reflect the various factors such as median home value, median household income, percentage of households with income under poverty level for a service area that is an unincorporated area within a township. It would appear the more agrarian areas that have small unincorporated areas that appear truly distressed have little recourse when looking at the distress scores of the surrounding agricultural community. Could there be a discussion about the possibility of having the community distress factors computed similar to the income surveys?

Thank you for the opportunity to express my concerns and comments regarding the Indiana 2013 Action Plan, OCRA CDBG 2013 Allocation Plan.

Best regards,
Trena

Trena Carter
Manager-Municipal Programs

ARa
748 Franklin Street
Columbus, IN 47201

E-mail: tcarter1@aracities.org
URL: www.aracities.org
Phone: 812.376.9949
Fax: 812.376.8857
Cell: 812.343.7991

"And when you get the choice to sit it out or dance - I hope you dance...."

From: Dawson, Beth
Sent: Friday, May 10, 2013 11:36 AM
To: tcarter1@aracities.org
Subject: Con Plan

May 10, 2013

Ms. Trena Carter
Via Email: tcarter1@aracities.org

Dear Ms. Carter:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

May 10, 2013

Consolidation Plan
Indiana Office of Community & Rural Affairs
One N. Capitol, Suite #600
Indianapolis, IN 46204-2027

Dear Mr. Sipe and Ms. Dawson:

I am writing on behalf of our residents of Indiana with disabilities that need accessible, affordable housing in inclusive communities. This is input for the 2013 Consolidation Plan.

For the most part, Indiana residents with a disability only earn a monthly income of $674. With exception to the monthly use of utilities (water, electric, gas, sewage), the median rental cost of a one bedroom apartment is $450 a month. For example I know someone living on this income. She can only afford $250 a month on rent. To no avail, she has tried for the last six months to find affordable, accessible housing.

What do you do when you can't afford housing with a fixed income? Your options are quickly limited to an institution, nursing home, roommate, homelessness or living with family or friends. Why should an individual with a disability have limited options? Finding affordable housing makes the search even harder. For example, I know a male that is currently living in a hotel. He has no extra income for a deposit. When he finds affordable housing the location is unsafe. The only option he knows is going to a homeless shelter and applying for governmental assistance.

Another example, Eva was denied for four years an accessible apartment at her subsidized Indianapolis apartment complex. She had limited mobility. Due to her limited mobility she cannot use the bathroom in her current residence. Without another option, Eva is forced to use the public bathroom which puts her at risk of being evicted. She also slept in the living room because her hospital bed wouldn't fit in the bedroom. She thought she was on the accessible apartment waiting list. When she would complain to property management they would state that she was never on it. Then she would again put her name on the waiting list. With the advocacy skills of an organization, Eva finally received an accessible apartment. Regardless of this outcome, the availability of affordable accessible housing in inclusive communities is only 5%. Start now by building all new homes and apartments with basic access or visit ability, no longer building inaccessible housing with our state and federal funds.

Because of the lack of affordable, accessible housing, there are people with disabilities forced into nursing homes. Without the availability or opportunity to increase income, how can an individual in a nursing home get out with no extra income? The individual feels trapped without a way out. Right now I know a senior forced in a nursing home because he doesn't have the income to fix the home modifications on his home that is a rental. Majority of the time home modifications grants go towards home owners instead of for renters. Therefore, I am asking for more funding to be allocated for renters.

As a person with a disability, I encourage you to make the right changes for people with disabilities to not only live in affordable, accessible housing in inclusive communities, but increase opportunities.

Sincerely,

Brandy Dickerson
317-517-0368
Brandy_Dickerson@hotmail.com

From: Dawson, Beth
Sent: Friday, May 10, 2013 12:37 PM
To: brandy_dickerson@hotmail.com
Subject: Con Plan

May 10, 2013

Ms. Brandy Dickerson
Via Email: brandy_dickerson@hotmail.com

Dear Ms. Dickerson:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

From: Donna Anderson [danderson@kennaconsulting.us]
Sent: Friday, May 10, 2013 1:59 PM
To: Dawson, Beth
Cc: Weissenberger, Kathleen A.
Subject: Comments for Consolidated Plan
Attachments: Consolidated Plan Letter.docx

Hi Beth and Kathleen:

Please see attached comments for the 2013 Consolidated Plan.

Thanks,
Donna

Donna Anderson, President
Kenna Consulting & Management Group, Inc.
6321 S. East Street
Indianapolis, IN 46227
Phone: (317) 781-1651
Fax: (317) 781-1683
Mobile: (317) 439-5008
E-mail: danderson@kennaconsulting.us

KENNA

Consulting & Management Group, Inc.

6321 S. East Street
Indianapolis, IN 46227
Ph: (317) 781-1651
Fax: (317) 781-1683

May 10, 2013

Kathleen Weissenberger
Community Affairs Division
Office of Community and Rural Affairs
One N. Capitol, Suite 600
Indianapolis, IN 46204-2208

RE: Comments for 2013 Consolidated Plan

Dear Ms. Weissenberger:

Please accept this letter as an official comment on the State's 2013 Draft Consolidated Plan. I understand the Indiana Office of Community and Rural Affairs reasons for the revisions to the CDBG program and believe that the proposed revisions are necessary for the continued funding for these programs. However, I would like to address the following two issues:

1. **Water/Wastewater Program:** I would like to see added the option of using the Section 108 CDBG Loan Guarantee Program as a source of match as well as SRF and USDA RD funds. I would also like to see a small set aside for small communities that cannot afford to bond or have met their maximum bonding capacity. This could be based on population size, etc...

2. **Grant Administration/Labor Standards Fees:** Grant Administration fees have not increased for over 13 plus years and the maximum grant amounts have decreased resulting in less administration fees. I would like the State to consider increasing the current maximum 8% for grant administration to a maximum of 10% of the grant amount. With the new water/wastewater program, I believe labor standards fees should be increased for these projects (similar to the Disaster Recovery Labor Standards scale).

I appreciate the opportunity to comment on the draft Consolidated Plan and would like to thank you in advance for your time and consideration.

Sincerely,

Donna Anderson

Donna Anderson
President
Kenna Consulting & Management, Group, Inc.

Dawson, Beth

From: dlmccart1@aol.com
Sent: Friday, May 10, 2013 1:41 PM
To: Sipe, Jacob; Dawson, Beth
Subject: Consolidated Plan, 2013 Action Plan Input
Attachments: BHIA_Comments_on_Consolidated Plan, 2013 Action Plan.doc

Dear Jake and Beth,

Thank you for the public hearing, survey and draft documents. Each has created an opportunity for study, reflection and hope.

All the best,

Deb
Deborah McCarty
Executive Director
Back Home in Indiana Alliance
317-638-2392
dlmccart1@aol.com

From: Dawson, Beth
Sent: Friday, May 10, 2013 2:33 PM
To: danderson@kennaconsulting.us
Subject: Con Plan

May 10, 2013

Ms. Donna Anderson
Via Email: danderson@kennaconsulting.us

Dear Ms. Anderson:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

May 10, 2013

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority

and

Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2288
Attn. Ms. Beth Dawson
bdawson2@ocra.in.gov.

Dear Mr. Sipe and Ms. Dawson,

On behalf of the Back Home in Indiana Alliance I would like to thank you and the representatives from IHCDA and OCRA for the opportunity to comment on the Consolidated Plan, 2013 Action Plan. Our concern is the on-going need for an increase in the availability of integrated, affordable and accessible housing for people with disabilities and older adults.

First, we extend a deep appreciation for the leadership provided by the Indiana Housing and Community Development Authority (IHCDA) to assure that persons with disabilities and older adults living in nursing homes and affiliated with the Indiana Money Follows the Person (MFP) program have access to integrated, affordable and accessible housing. The establishment of a preference in the IHCDA Section 8 Housing Choice Voucher program for persons associated with MFP allows those living in deep poverty to move out of nursing homes into a home of one's choice, in the community of choice, with needed supports. *IHCDA is providing national leadership in the deinstitutionalization movement and in the implementation of the Olmstead decision through the allocation of these housing vouchers.*

We ask you to hold fast to this commitment. The state contract for the implementation of the Money Follows the Person program is now open and new organizations are completing for the administration of this federally-funded deinstitutionalization effort. The original Contractor of MFP (Advantage Health Solutions) has outcomes that reflect minimal referrals for integrated and affordable housing, and personalized supports. For example, in the Advantage Health Solutions March 2013 report, 65% (or 17 persons) of the persons served by MFP moved into an assisted living unit. For those who were not homeowners, nor had family with whom to share a home, 15% (or 4 persons) were assisted to transition to a rental home/apartment of their own. Cumulatively, MFP has transitioned 50% (442 persons) of participants into assisted living, with only 15% (142) of persons moved into typical rental housing from the nursing home. These are very poor housing and support outcomes for those former nursing home residents who are not homeowners, nor have family with whom to share a home in the community (Source of MFP Data: www.advantageplan.com/mfp).

Second, the ConPlan needs to expand the investment of increasing the availability of integrated, affordable and accessible housing for people with SSI incomes or lower who live in the community and are not institutionalized. There is not one single market rate one-bedroom or efficiency apartment in Indiana where a person with only SSI income can afford to live.* Section 8 project based housing and tenant based housing is at capacity in most communities and waiting lists are long and often closed. Low income housing tax credit properties, the fastest growing affordable housing over the past 10 years, is largely not affordable for those with SSI incomes – people with disabilities are "priced out" of this housing market. We must use HOME funds for increased rental subsidies, along with other rental subsidy strategies, that promote integrated housing (people with and without disabilities or "special needs" living in same development; economic integration) to assure that those with very low incomes receive a fair share of the HOME funds.

* Source: Priced Out. The Housing Crisis for People with Disabilities by Emily Cooper, Henry Korman, Ann O'Hara and Andrew Zovistoski. Technical Assistance Collaborative, Inc. and Consortium for Citizens with Disabilities. Boston, Mass. April 2009. For the full Priced Out report more see: www.tacinc.org Click on Publications.

Third, IHCDA and OCRA need to assist individual jurisdictions to adopt *visitability* ordinances that mandate basic access in all new housing (e.g., single family home, townhouse) not yet covered by current law or policy (with exemption from the zero-step entrance where topographical features make that unfeasible). Basic access features are defined in 2009 ICC A117.1, Accessible and Useable Buildings and Facilities. Excerpt of requirements for Type C (Visitable) Units and include

In addition, IHCDA and OCRA need to establish policies that provide incentives or a threshold requirement for federally financed housing developers to construct new housing with basic access (e.g., zero-threshold entrance, 31 ¾ inch wide door, bathroom on ground floor)

Finally, it is recommended that opportunities be enhanced for the education of architects, designers, developers and builders of single- and multi-family housing on accessibility requirements (fair housing, Section #504 and visitability). The Fair Housing Center of Central Indiana released a report in April 2013 that demonstrated a high percentage of tested multi-family housing that was found to be non-compliant with fair housing accessibility standards.

.

Fourth, all new federally financed accessible and affordable housing needs to be *affordable* for those with SSI incomes (<20% Area Median Income). All existing accessible federally funded housing needs to be made affordable for those with SSI incomes, including units developed through the Low Income Housing Tax Credit program (LIHTC)). Although LIHTC is not included in the ConPlan allocation of funds it has been the fastest growing affordable housing in the state. People with disabilities on SSI incomes have not been able to afford the rent on almost all of these federally required accessible units.

The IHCDA is to be commended for the incentives in the Qualified Allocation Plan that encourage developers to increase the percentage of #504 accessible units. The response has been very positive with an average of 13% of the units within a development meeting accessibility requirements. It is recommended that these incentives be maintained and strengthened by the provision of rental subsidies or affordability standards for these units.

Fifth, the ConPlan needs to increase the availability of home modification funds for people with disabilities and older adults to assure housing stability and safety. Home modification funds need to be available for both homeowners and renters. By 2040, 1 in 5 Hoosiers will be 65 or older. Currently there are about 1 million Hoosiers age 60 and older. Older Hoosiers want to age in place. 94% would like to remain in their current residence as long as possible. 39% are not very confident they will be able to afford to do so. (Source: Dr. Phil Stafford. 2008 Indiana AdvantAge Initiative survey results. For a complete report see website: www.agingindiana.org).

There are 44,030 Indiana renters with mobility and self-care limitations, including those 62 and older, where household incomes are less than 30% (**Source:** 2000 CHAS Data Book)

Home modification funds through IHCDA are currently restricted for use to homeowners. Those who rent and need to make internal modifications to the unit do not have access to HOME or CDBG funds to help with the cost. Making internal modifications remains the renter's expense for those who are unable to locate a suitable rental unit in the community.

Why are only 14% of our Community Development Block Grant funds projected for use for housing when many Hoosiers are facing a housing crisis, when there are few accessible housing units and when these funds could help modify and repair the homes for the older adults who hope to remain in their own homes as long as possible?

We hope to see a shifting in the proposed budget for the coming year to address both the critical affordability housing needs identified and the growing need for housing that can be used by all of Indiana's citizens. Thank you for this opportunity.

Deborah McCarty
Director, Back Home in Indiana Alliance
Dlmccart1@aol.com

From: Dawson, Beth
Sent: Friday, May 10, 2013 2:31 PM
To: Deborah McCarty
Subject: Con Plan

May 10, 2013

Ms. Deborah McCarty
Via Email: dlmccart1@aol.com

Dear Ms. McCarty:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

From: Carolina Mora [cmora00@hotmail.com]
Sent: Friday, May 10, 2013 1:02 PM
To: Sipe, Jacob; Dawson, Beth
Subject: State Consolidated Plan Public Input

Indianapolis, May 5, 2013

Re: Consolidated Plan

Dear Mr. Sipe and Ms. Dawson,

I am writing to give input into the Consolidated Plan. I have summarized barriers to integrated, affordable and accessible housing for persons with disabilities and identified recommended actions or proposed solutions for each barrier.

Barrier # 1. Latinos and Hispanics people with **and without disabilities, who facing daily situations of discrimination each time they apply for housing.**

Solution #1. The highest rate of fair housing discrimination complaints are received from persons with disabilities.

- Educate Landlords and staff that work in the apartments and houses for rent to not discriminate by color, race, religion, gender, language, disability, etc.
- Establish a Fair Housing Testing Program in order to see how landlords and staff manage the application process for housing, and also see how they treat potential renters and tenants.
- Enforce fair housing law and educate <u>all</u> on fair housing reasonable accommodations and modifications.
- Make sure that people who are renting are given information (written and in tenant meetings) about fair housing law and procedures about filing complaints about fair housing discrimination.
- Require landlords/property managers to attend fair housing seminars on a regular basis.
- Fund/create a fair housing testing program. Report publicly testing results and enforcement actions.

Barrier # 2. Latinos and Hispanics people with SSI income levels cannot afford "affordable housing."

Solution # 2.

- Make more units affordable to people at 30% or lower Area Median Income by developing incentives for affordable housing developers. Conversion of Section 8 vouchers to project based Section 8 within Tax Credit properties is another avenue to increase the available housing for those with SSI incomes, especially when the tenant can then use this voucher to move to another affordable unit, if preferred.
- Designate the use of Tenant Based Rental Assistance (TBRA) for: 1). assisting persons to move out of nursing homes, and; 2). to assist with the high cost of Section #504 accessible units. TBRA could be replaced by funding through the Section 8 Housing Choice Voucher program when the person's name came up on the IHCDA Section 8 Waitlist. Historically most HOME dollars have substantially benefited homebuyers and developers of multi-family housing. I am asking that a fair share of HOME funds be allocated for persons with very low income.
- Use a percentage of all ConPlan related funding to assist persons exit institutions with access to integrated, affordable housing within communities and housing of choice.

Barrier #3. Newly constructed or renovated housing is not accessible.
Solution #3.

- Make all new construction of single family homes & townhouses usable for all by adopting visitability standards as a requirement (unless topography of land prohibits these design features).
- Assure that home modifications funds are available for making appliances accessible for persons with sensory/mobility disabilities.
- Enforce fair housing accessibility standards (e.g. lower light switches, door handles vs. knobs; wider doors, turning space in bath & kitchen).
- Maintain incentives for tax credit properties that use federal housing dollars to increase the number of Section 504 units beyond the 5% minimum.

Barrier #4. Existing programs/providers do not practice scattered site or individualized and dispersed (integrated) housing.
Solution #4.

- Develop accessible units across the state to increase the options of where to live.
- Options are often limited to segregated housing where others with disabilities or seniors live.
- Do not differentiate persons with disabilities by type of disability in housing, surveys, agency literature.
- Educate landlords that having persons with disabilities is not "scary" or a liability.
- Enforce fair housing law and provide education on fair housing accommodations and modifications.

- Do not develop any new housing that separates persons with disabilities, including those with a history of homelessness.

Thank you for this opportunity,

Carolina Mora-Sanchez
cmora00@hotmail.com

Carolina Mora S.

From: Dawson, Beth
Sent: Friday, May 10, 2013 2:30 PM
To: cmora00@hotmail.com
Subject: Con Plan

May 10, 2013

Ms. Carolina Mora-Sanchez
Via Email: cmora00@hotmail.com

Dear Ms. Mora-Sanchez:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

From: Sherry Martin [deepdarkorchid@gmail.com]
Sent: Friday, May 10, 2013 1:00 PM
To: Dawson, Beth
Subject: Input into the Indiana Consolidated Plan

May 10, 2013

To: Beth Dawson

Re: Input on Indiana Consolidated Plan

Dear Ms. Dawson,

I am writing to give my input into the Indiana Consolidated Plan. I take a great deal of pride in our state, and its openness and diversity. I see a sense of harmony between people of different races and backgrounds that I have not seen in many other places that I have lived in. Unfortunately, I feel that this inclusiveness does not totally extend to another important minority; I am speaking of people with disabilities. I have noted a tendency for housing programs to offer segregated housing for people with physical disabilities, rather than scattered site housing. While there are a small percentage of multi-family units customized especially for those with physical disabilities, a majority of new housing, in particular single-family residences, are not accessible or visitable. People with disabilities are as diverse as the population in general. Most of us have friends who do not have disabilities. It is sad and shameful that in such an advanced and forward-looking state, people with disabilities are restricted in our social life because the homes of our nondisabled friends are not visitable.

This segregation is worrying in that there are real and serious drawbacks in this restriction of people with disabilities. If people with disabilities are not able to integrate freely in the general community, many people without disabilities will never get a chance to know them. Isolating and reduction of person-to-person contact is the most effective way to promote prejudice and stigma. We want to live in a country where people are given the best chance to advance and achieve their goals. If the consolidated plan is not allocating funds to build more accessible and visitable homes, it is clear that that IHCDA is not affirmatively furthering fair housing.

To combat this problem, I and my friends would like to see a significant increase in the number of newly constructed single-family dwellings that are accessible, or at the very least, visitable by people with disabilities. Standards of visitability state that there should be a bathroom on the first floor, the front doorway has a clearance of 32 inches in width and there is no step on the front threshold. The more accessible units and homes available across the state, the more choice that people with disabilities can have regarding their housing, and ultimately, the more truly integrated our state will be.

Thank You for your attention to this matter.

Sincerely Yours,

Sherry A. Martin, M.A.

From: Dawson, Beth
Sent: Friday, May 10, 2013 2:27 PM
To: deepdarkorchid@gmail.com
Subject: Con Plan

May 10, 2013

Ms. Sherry Martin
Via Email: deepdarkorchid@gmail.com

Dear Ms. Martin:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

From: Sarah Meyer [sarah.meyer55@gmail.com]
Sent: Friday, May 10, 2013 3:48 PM
To: Dawson, Beth; Sipe, Jacob
Subject: Input for Consolidated Plan

Dear Mr. Sipe and Ms. Dawson:

I am writing to provide input regarding the Consolidated Plan. I am a person with a disability and also an advocate for people with disabilities; therefore, I am writing to address the barriers that persons with disabilities face to obtaining integrated, affordable, and accessible housing, as well as to propose some possible solutions to address these barriers.

Barrier #1: People with SSI income levels cannot afford "affordable housing." According to the most recent Priced Out of Housing Report, published by the Technical Assistance Collaborative (TAC) and the Consortium for Citizens with Disabilities (CCD) Housing Task Force, "In 2010, approximately 4.4 million adults with disabilities between the ages of 18 and 65 who relied on the federal Supplemental Security Income (SSI) program had incomes of less than $8,500 per year - low enough to be completely priced out of every single rental housing market in the country." According to this study, the average cost in Indiana of a studio or efficiency apartment would equal 76% of SSI, and the cost of a modest one-bedroom unit would consume 86% of SSI, making it impossible for individuals with disabilities who rely on SSI to live in the community. As a result, people with disabilities are forced to remain in nursing homes and other institutions rather than having the freedom to live independently in the community. Historically, most of HOME funding has substantially benefited homebuyers and developers of multi-family housing with less than 1% (only 298 households) allocated towards the TBRA program. I am asking that a fair share of HOME funds be designated to assist persons with very low income so they have access to integrated, affordable, accessible housing.

Solution #1:

- Make more units affordable to people at 30% or lower Area Median Income. This should not only include one-bedroom units, but also needs to include multi-bedroom units for families who are living on an SSI income level with person(s) with disabilities.
- Designate the use of Tenant Based Rental Assistance (TBRA) funds to assist persons with moving from nursing homes in to the community and to assist with the high cost of Section #504 accessible units

Barrier #2: The highest rates of fair housing discrimination complaints are received from people with disabilities.

Solution #2:

- Enforce fair housing law and educate all (including housing providers and tenants) about what reasonable accommodations and modifications are under fair housing law.
- Ensure that all renters are given information (in written format and in tenant meetings) about fair housing law and procedures for filing complaints about fair housing discrimination. All people deserve to know what their rights are and how to have their rights protected. I make this recommendation because it wasn't until I went through fair housing training that I realized that my fair housing rights were violated by my former property management; I knew that my request for a disability-

related accommodation had been denied, but I did not know that there was a law and procedures to protect against such an incident. I was overwhelmed by the whole situation and did not know if I had grounds to do anything about it until I received training about fair housing law and learned how to take action to prevent the discrimination I experienced from happening to others.

- Require landlords, property managers, and realtors to attend and participate in fair housing seminars and trainings on a regular basis.
- Create and fund a statewide fair housing testing program to identify rates of compliance with fair housing law as well as needs for improving and enforcing compliance. This recommendation would be a proactive strategy of dealing with fair housing issues head-on rather than simply reacting to complaints. Many people who are victims of discrimination do not report their experience, so having a testing program would provide necessary information to improve access to integrated, affordable, and accessible housing for all. I also strongly recommend publicly reporting the results of this testing program, as well as enforcement actions, in order to educate and hold housing providers accountable.

Barrier #3: Newly constructed and renovated housing is not accessible.

Solution #3:

- Require the adoption of visitability standards (unless land topography prohibits these design features) for new construction of single family homes and townhomes to ensure that all people of all abilities can live in and visit these units.
- Designate home modifications funds to be available for making appliances accessible for persons with sensory/mobility disabilities.
- Enforce fair housing accessibility standards
- Increase the number of Section 504 units beyond the 5% minimum required for federally-funded housing.

Finally, I would like to ask that all surveys and literature you produce are fully accessible to users of screen-reading technology.
The recent survey dealing with analysis of impediments to fair housing was not fully accessible to people with visual impairments who rely on screen-reading technology; this barrier in and of itself is an impediment that can prevent people with visual disabilities from providing input towards the Consolidated Plan. I would also ask that any surveys or agency literature not differentiate people with disabilities by types of disabilities (i.e., physical, cognitive, mental health, etc.) as this separates and segregates people based on disability.

I sincerely thank you for this opportunity to provide feedback.

Sarah Meyer

From: Dawson, Beth
Sent: Friday, May 10, 2013 3:58 PM
To: sarah.meyer55@gmail.com
Subject: Con Plan

May 10, 2013

Ms. Sarah Meyer
Via Email: sarah.meyer55@gmail.com

Dear Ms. Meyer:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

From: Sherri Wagoner [sidc@rtccom.net]
Sent: Friday, May 10, 2013 4:12 PM
To: Dawson, Beth
Subject: Plan Consolidation Comment Letter
Attachments: Consolidation Plan Comment Ltr 51013.pdf

Attached please find a Comment Letter in reference to the Consolidation Plan from Greg E. Jones, Executive Director of the Southern Indiana Development Commission

Thank you!
Sherri

Sherri K. Wagoner
Southern Indiana
Development Commission
PO Box 442
Loogootee, IN 47553
812-295-3707
812-295-3717
staff@sidc.cc
www.sidc.cc

SOUTHERN INDIANA DEVELOPMENT COMMISSION

P.O. BOX 442 LOOGOOTEE, INDIANA 47553 • 812-295-3707 FAX: 812-295 3717 • E-mail - staff@sidc.cc • Web Page - www.sidc.cc

May 8, 2013

Consolidated Plan
ATTN: Ms. Kathleen Weissenberger
Director of Community Affairs
Indiana Office of Community and rural Affairs
One North Capitol, Suit 600
Indianapolis, IN 46204-2027

Dear Kathleen:

We are a Regional Planning Commission that covers five counties with a majority of smaller populated towns and cities. After reviewing the proposed 2014 Consolidated Plan, we are concerned about the possible changes to its programs. We are specifically concerned about the ones that apply to infrastructure improvements to systems for water and wastewater.

I believe the proposed program will have a negative impact on small, rural communities. In our experience with these communities, an entire system overhaul is not always necessary, but may require improvements to a part or piece of the system in order to operate more efficiently or to meet capacity issues such as new wells, tanks or inflow and infiltration problems. Also the useful life of some of these projects does not last as long as the repayment loan timeframe. The current threshold of 7 years to apply is already burdensome enough and to make that timeframe longer will be detrimental to communities without large bonding capacity. The other funding agencies are often needed, but are not always necessary for a community's improvements in order to meet regulations that have been placed on a community by a regulatory office such as IDEM.

USDA and SRF requires bonding and it adds significant non-construction costs with the addition of attorneys and rate professionals as well as additional engineering and isn't actually needed for some smaller projects that are necessary to keep a system up and running. It is common for bigger projects to warrant these requirements, but not all. These requirements often cause delays in being able to get the project done in a timely manner as well as hindering the community's ability to complete additional system improvements due to indebtedness.

I honestly believe the true problem or concern is the timing between agencies when dealing with a substantial size project. This needs to be addressed in order to better accommodate for the CDBG programs that are truly a great benefit to our communities when they fit the requirements of everyone.

I also believe the State does a good job getting funds out to support communities in Indiana and fear some of these changes would be a significant hindrance to some of the communities that you strive to help.

Sincerely,

Greg E. Jones
Executive Director

Serving The Development Needs Of Daviess, Greene, Knox, Lawrence and Martin Counties

From: Dawson, Beth
Sent: Friday, May 10, 2013 4:14 PM
To: sidc@rtccom.net
Subject: Con Plan

May 10, 2013

Ms. Sherri K. Wagoner
Via Email: sidc@rtccom.net

Dear Ms. Wagoner:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

From: Sandy Proctor [waynetownclerk@sbcglobal.net]
Sent: Friday, May 10, 2013 4:18 PM
To: Dawson, Beth
Subject: Fw: Consolidated Plan Comments

----- Forwarded Message ----
From: Sandy Proctor <waynetownclerk@sbcglobal.net>
To: bdawson2@ocr.in.gov
Cc: waynetownclerk@sbcglobal.net
Sent: Fri, May 10, 2013 4:15:46 PM
Subject: Consolidated Plan Comments

Beth,

Water/Wastewater Improvements Program Comments

1. Eligible applicants will have approved projects with the Indiana State Revolving Fund and/or the USDA-RD Water and Environmental Programs.
   I do not think we should be required to have a loan on a Project.

2. **I do not understand the concept behind the 3 Tier Level of Funding** - Basically, if your community has 61.1% low income people and you charge them a lot for Wastewater (Over $50) * Water (Over $45) then we can apply for more money. Example: If you charge under $30 for Sewer and not over $50 then there is a difference of $350,000 that you can apply for. **I really do not understand the logic behind this. What am I missing?**

Furthermore, the threshold used to be a total of $55 for wastewater, water and stormwater AND the wastewater based on the amount charged for $4,000 gallons of water and it is going to the 3 Tier Level of Funding.

Storm Water Improvements Program Comments

1. Sustainability (50 Points)
   I would like to see the dollar amount charged for Stormwater be changed to the following:
   0 points - under $2 - **Not $3**
   25 points - $2 - $5
   50 points - $5 or higher

Stellar Communities $4,000,000

I do not understand when you have an allocation of $27,107,784 the concept of why your would give $4,000,000 or 14.75% of the money to only 2 Communities. Furthermore, this is just the CDBG money and not the HOME money they also get.

I would appreciate it if someone could respond to my concerns.

Thanks,
Sandy Proctor
Waynetown Clerk-Treasurer
765-234-2154 Ext 12

I

From: Dawson, Beth
Sent: Friday, May 10, 2013 4:31 PM
To: waynetownclerk@sbcglobal.net
Subject: Con Plan

May 10, 2013

Ms. Sandy Proctor
Via Email: waynetownclerk@sbcglobal.net

Dear Ms. Proctor:

Thank you for expressing your interest in the FY 2013 Consolidated Plan for Funding. We appreciate that you took the time to provide us with feedback.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the FY 2013 Consolidated Plan to the U. S. Department of Housing and Urban Development.

Please contact our office should you have additional questions.

Sincerely,

Beth Dawson

Beth Dawson, Administrative Assistant
Indiana Office of Community and Rural Affairs
One North Capitol Avenue - Suite 600
Indianapolis, Indiana 46204
Office: 317.232.8333
Fax: 317.233.3597
bdawson2@ocra.IN.gov

Hi, my name is Terry Moreland and would like to address some of the problems with housing, because I used to live in an older building. It was built in 1971 or 1972. Many of the standards today do not apply to the building because it is and older building. This particular building was built for the elderly, not for people with disabilities. People with disabilities live there, trying to make the best of things. When new cabinets were installed, some if not all, of the shelves are too high to reach things safely. The bathroom door is one inch too short for a wheelchair to safely fit through the doorway. The counter space is not large enough to place things on when a person is preparing meals. The vent on top of the roof sometimes falls down, and smoke goes into all the apartments from one resident smoking.

We need better, safer, affordable, and accessible housing and we need it soon! People on SSI are already struggling to pay for and live in environments that are not handicapped accessible and beyond their budgets.

Sincerely,

Terry Moreland

Heidi Aggeler

From: Stockment, Rodney [rstockment@ihcda.IN.gov]
Sent: Monday, May 13, 2013 10:09 AM
To: Heidi Aggeler
Cc: Palus, Joe
Subject: FW: Consolidated Plan

From: Sipe, Jacob
Sent: Friday, May 10, 2013 2:36 PM
To: Stockment, Rodney
Subject: FW: Consolidated Plan

From: Allison Bracken [mailto:allisonrolls@gmail.com]
Sent: Friday, May 10, 2013 1:39 PM
To: bdawson@ocra.in.gov; Sipe, Jacob
Subject: Consolidated Plan

Dear Mr. Sipe and Ms. Dawson,

I am writing to provide input for the Consolidated Plan. I am a person with a disability and full-time wheelchair user and also advocate on behalf of people with disabilities with a regional organization. I am writing about specific barriers people with disabilities face when looking for affordable, accessible and integrated housing. I have also included some recommendations that could help break these barriers down. Thanks in advance for your time and consideration.

The most common barrier I see is that people with disabilities on SSI cannot afford "affordable housing." There are units at 30% or lower AMI, but there aren't enough. The waiting lists for these units are often 2-3 years or longer, which puts individuals on SSI income at risk for homelessness or institutionalization (costing the state more money in the long run.) Making more units available at 30% AMI could prevent this from happening by providing incentives for developers. Also, converting Section 8 vouchers to project based Section 8 in Tax Credit properties could be another way to increase the number of affordable units for people on SSI.

I noticed on the 1992-2010 allocation of HOME funds, over 80% of HOME dollars were used to benefit homebuyers, but very little (if any…less than 1% noted on the allocation) benefitted persons with SSI income. I was surprised by that and wondered why a fair share of those dollars weren't being used for SSI or low income recipients. Re-allocating those funds could assist more individuals on SSI obtain affordable housing.

Another barrier I have seen is the lack of accessible housing dispersed state-wide and integrated. When I first moved to Indianapolis 10 years ago, I needed a wheelchair accessible apartment and found mostly accessible apartments in developments that were limited to people with disabilities or seniors. I was 27 at the time and very active and independent and didn't want to live in a segregated community. I would have loved to have had more options of accessible units across the city (and state, should I move in the future) in different developments. Developing more of these units state and city wide would decrease segregation and improve housing experience for people with disabilities. Also, I feel as though landlords and developers are not educated when it comes to persons with disabilities and jump to the conclusion that we are a liability or will create a problem, extra work, etc. Educating landlords and developers on disability (including fair housing law) will help landlords welcome people with disabilities and increase housing opportunities for people needing accessible units.

An issue within these accessible units is ensuring that home modification funds are available to help individuals with sensory and mobility disabilities modify housing to meet their needs. For myself, I need door handles rather than knobs, knobs on the front of the stove, lower light switches, etc. Enforcing Fair Housing standards would help with this as well. Another solution would be to maintain incentives for tax credit properties that use federal housing dollars to increase the number of Section 504 units beyond the 5% minimum.

Another barrier I have experienced is the lack of accessibility in current, new, and renovated housing. Because I work with people with disabilities, I often meet them in their homes and have found it difficult due to the lack of accessibility. A solution to this would be to make all renovated and newly constructed single family homes “visitable” to all, meaning wide doors of 32” and access to restrooms. Even outside of work, being able to visit friends wherever I go is important to me (as I can imagine important to all wheelchair users).

Thank you for your time!

Sincerely,

Allison Bracken
allisonrolls@gmail.com

Certifications and SF-424s

CDBG, HOME, ESG, HOPWA

STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the State certifies that:

Affirmatively Further Fair Housing -- The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying -- To the best of the State's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts

under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of State -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

5-13-13

Signature/Authorized Official

Date

Executive Director

Title

Specific HOME Certifications

The State certifies that:

Tenant Based Rental Assistance -- If it intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the State's consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Appropriate Financial Assistance -- Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

____
Signature/Authorized Official

5-13-13
Date

Executive Director
Title

ESG Certifications

Each State that seeks funding under the Emergency Solutions Grants Program must provide the following certifications:

Matching Funds – The State will obtain any matching amounts required under 24 CFR 576.201 in a manner so that its subrecipients that are least capable of providing matching amounts receive the benefit of the exception under 24 CFR 576.201(a)(2).

Discharge Policy – The State will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Confidentiality – The State will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

The State will ensure that its subrecipients comply with the following criteria:

Major rehabilitation/conversion – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – If ESG funds are used for shelter operations or essential services related to street outreach or emergency shelter, the subrecipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Homeless Persons Involvement – To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted ESG.

Consolidated Plan – All activities the subrecipient undertakes with assistance under ESG are consistent with the State's current HUD-approved consolidated plan.

______________________________ 5-13-13

Signature/Authorized Official Date

Executive Director

Title

HOPWA Certifications

The State HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under the program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,

2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

____
Signature/Authorized Official

5-13-13
Date

Executive Director
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

OMB Number: 4040-0004
Expiration Date: 01/31/2009

Application for Federal Assistance SF-424

Version 02

*1. Type of Submission:	*2. Type of Application	* If Revision, select appropriate letter(s)
☐ Preapplication	☐ New	
☒ Application	☒ Continuation	*Other (Specify)
☐ Changed/Corrected Application	☐ Revision	

3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

*5b. Federal Award Identifier: B-13-DC-18-0001

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*a. Legal Name: State of Indiana

*b. Employer/Taxpayer Identification Number (EIN/TIN): 35-6000158

*c. Organizational DUNS: 79-2737483

d. Address:

*Street 1: One North Capitol, Suite 600
Street 2:
*City: Indianapolis
County: Marion
*State: Indiana
Province:
*Country: US
*Zip / Postal Code 46204

e. Organizational Unit:

Department Name: Office of Community and Rural Affairs

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms.
*First Name: Kathleen
Middle Name:
*Last Name: Weissenberger
Suffix:

Title: Director, Grant Services Division

Organizational Affiliation:

*Telephone Number: 317-232-1703

Fax Number: 317-233-3597

*Email: kweissenberger@ocra.in.gov

OMB Number: 4040-0004
Expiration Date: 01/31/2009

Application for Federal Assistance SF-424 Version 02

***9. Type of Applicant 1: Select Applicant Type:**

A.State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*Other (Specify)

***10 Name of Federal Agency:**

US Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-228

CFDA Title:

State

***12 Funding Opportunity Number:**

*Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Non-entitlement Cities, incorporated towns and counties in Indiana

***15. Descriptive Title of Applicant's Project:**

State Community Development Block Grant Program

Application for Federal Assistance SF-424

Version 02

16. Congressional Districts Of:

*a. Applicant:

*b. Program/Project: 1-9

17. Proposed Project:

*a. Start Date:

*b. End Date:

18. Estimated Funding ($):

*a. Federal	27,107,784
*b. Applicant	
*c. State	
*d. Local	
*e. Other	
*f. Program Income	
*g. TOTAL	27,107,784

***19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on _____

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E. O. 12372

***20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)**

☐ Yes ☒ No

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions

Authorized Representative:

Prefix: Mr. *First Name: Dax

Middle Name:

*Last Name: Norton

Suffix:

*Title: Executive Director

*Telephone Number: 317-232-8856 Fax Number: 317-233-3597

* Email: dnorton@ocra.in.gov

*Signature of Authorized Representative: *Date Signed: 5/14/2013

Application for Federal Assistance SF-424

Version 02

***Applicant Federal Debt Delinquency Explanation**

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.

APPLICATION FOR FEDERAL ASSISTANCE

Version 7/03

2. DATE SUBMITTED	Applicant Identifier
3. DATE RECEIVED BY STATE	State Application Identifier
4. DATE RECEIVED BY FEDERAL AGENCY	Federal Identifier

1. TYPE OF SUBMISSION:

Application
- ☐ Construction
- ☑ Non-Construction

Pre-application
- ☐ Construction
- ☐ Non-Construction

5. APPLICANT INFORMATION

Legal Name: Indiana Housing & Community Development Authority	Organizational Unit: Department:
Organizational DUNS: 08687040790000	Division:
Address: Street: 30 South Meridian Street, Suite 1000	Name and telephone number of person to be contacted on matters involving this application (give area code) — Prefix: Ms. First Name: Lori
City: Indianapolis	Middle Name
County: Marion	Last Name: Dimick
State: IN; Zip Code: 46204	Suffix:
Country: USA	Email: ldimick@ihcda.in.gov
6. EMPLOYER IDENTIFICATION NUMBER *(EIN)*: 35-1485172	Phone Number (give area code): 317-232-7777; Fax Number (give area code): 317-232-7778

8. TYPE OF APPLICATION:

☑ New ☐ Continuation ☐ Revision

If Revision, enter appropriate letter(s) in box(es)
(See back of form for description of letters.)

Other (specify)

7. TYPE OF APPLICANT: (See back of form for Application Types)

A - State

Other (specify)

9. NAME OF FEDERAL AGENCY:
Department of Housing & Urban Development

10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: 14-241

TITLE (Name of Program):
Housing Opportunities for Persons with AIDS

11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:
Indiana HOPWA Program

12. AREAS AFFECTED BY PROJECT *(Cities, Counties, States, etc.)*:
Indiana

13. PROPOSED PROJECT

Start Date:	Ending Date:
7/1/13	6/30/14

14. CONGRESSIONAL DISTRICTS OF:

a. Applicant	b. Project
IN-07	IN-All

15. ESTIMATED FUNDING:

a. Federal HOPWA	$ 1,050,000 .00
b. Applicant	$ .00
c. State	$ .00
d. Local	$ .00
e. Other	$ .00
f. Program Income	$ .00
g. TOTAL	$ .00

16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?

a. Yes. ☐ THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON

DATE:

b. No. ☑ PROGRAM IS NOT COVERED BY E. O. 12372

☐ OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW

17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?

☐ Yes If "Yes" attach an explanation. ☑ No

18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.

a. Authorized Representative

Prefix: Mr.	First Name: J.	Middle Name: Jacob
Last Name: Sipe		Suffix: Jr.
b. Title: Executive Director		c. Telephone Number (give area code): 317-232-7777
d. Signature of Authorized Representative		e. Date Signed: May 15 2013

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Standard Form 424 (Rev.9-2003)
Prescribed by OMB Circular A-102

APPLICATION FOR FEDERAL ASSISTANCE

Version 7/03

2. DATE SUBMITTED		Applicant Identifier
3. DATE RECEIVED BY STATE		State Application Identifier
4. DATE RECEIVED BY FEDERAL AGENCY		Federal Identifier

1. TYPE OF SUBMISSION:

Application	Pre-application
☐ Construction	☐ Construction
☑ Non-Construction	☐ Non-Construction

5. APPLICANT INFORMATION

Legal Name: Indiana Housing & Community Development Authority	**Organizational Unit:** Department:
Organizational DUNS: 08687040790000	Division:
Address: Street: 30 South Meridian Street, Suite 1000	**Name and telephone number of person to be contacted on matters involving this application (give area code)** Prefix: Ms. First Name: Lori
City: Indianapolis	Middle Name
County: Marion	Last Name Dimick
State: IN / Zip Code 46204	Suffix:
Country: USA	Email: ldimick@ihcda.in.gov
6. EMPLOYER IDENTIFICATION NUMBER *(EIN)*: 35-1485172	Phone Number (give area code) 317-232-7777 / Fax Number (give area code) 317-232-7778

8. TYPE OF APPLICATION:

☑ New ☐ Continuation ☐ Revision

If Revision, enter appropriate letter(s) in box(es)
(See back of form for description of letters.) ☐ ☐

Other (specify)

7. TYPE OF APPLICANT: (See back of form for Application Types)

A - State

Other (specify)

9. NAME OF FEDERAL AGENCY:
Department of Housing & Urban Development

10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: 14-231

TITLE (Name of Program):
HOME Investment Partnerships Program

11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:
Emergency Solutions Grant Program

12. AREAS AFFECTED BY PROJECT *(Cities, Counties, States, etc.)*:
Indiana

13. PROPOSED PROJECT

Start Date:	Ending Date:
7/1/13	6/30/14

14. CONGRESSIONAL DISTRICTS OF:

a. Applicant	b. Project
IN-07	IN-All

15. ESTIMATED FUNDING:

a. Federal ESG	$ 2,725,500 .00
b. Applicant	$ .00
c. State	$ .00
d. Local	$ .00
e. Other	$ .00
f. Program Income	$ .00
g. TOTAL	$ .00

16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?

a. Yes. ☐ THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON

DATE:

b. No. ☑ PROGRAM IS NOT COVERED BY E. O. 12372

☐ OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW

17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?

☐ Yes If "Yes" attach an explanation. ☑ No

18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.

a. Authorized Representative

Prefix Mr.	First Name J.	Middle Name Jacob
Last Name Sipe		Suffix Jr.
b. Title Executive Director		c. Telephone Number (give area code) 317-232-7777
d. Signature of Authorized Representative		e. Date Signed May 15 2013

APPLICATION FOR FEDERAL ASSISTANCE

Version 7/03

2. DATE SUBMITTED	Applicant Identifier
3. DATE RECEIVED BY STATE	State Application Identifier
4. DATE RECEIVED BY FEDERAL AGENCY	Federal Identifier

1. TYPE OF SUBMISSION:

Application	Pre-application
☐ Construction	☐ Construction
☑ Non-Construction	☐ Non-Construction

5. APPLICANT INFORMATION

Legal Name: Indiana Housing & Community Development Authority	Organizational Unit: Department:
Organizational DUNS: 08687040790000	Division:
Address: Street: 30 South Meridian Street, Suite 1000	Name and telephone number of person to be contacted on matters involving this application (give area code) Prefix: Mr. First Name: Matt
City: Indianapolis	Middle Name
County: Marion	Last Name Rayburn
State: IN Zip Code 46204	Suffix:
Country: USA	Email: mrayburn@ihcda.in.gov
6. EMPLOYER IDENTIFICATION NUMBER (EIN): 35-1485172	Phone Number (give area code) 317-232-7777 / Fax Number (give area code) 317-232-7778

8. TYPE OF APPLICATION:

☑ New ☐ Continuation ☐ Revision

If Revision, enter appropriate letter(s) in box(es)
(See back of form for description of letters.)

Other (specify)

7. TYPE OF APPLICANT: (See back of form for Application Types)

A - State

Other (specify)

9. NAME OF FEDERAL AGENCY:
Department of Housing & Urban Development

10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: 14-239

TITLE (Name of Program):
HOME Investment Partnerships Program

11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:
Indiana HOME Investment Partnerships Program

12. AREAS AFFECTED BY PROJECT *(Cities, Counties, States, etc.)*:
Indiana

13. PROPOSED PROJECT

Start Date:	Ending Date:
7/1/13	6/30/14

14. CONGRESSIONAL DISTRICTS OF:

a. Applicant	b. Project
IN-07	IN-All

15. ESTIMATED FUNDING:

a. Federal HOME	$ 14,750,000 .00
b. Applicant	$ .00
c. State	$ .00
d. Local	$ .00
e. Other	$ .00
f. Program Income	$ .00
g. TOTAL	$ .00

16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?

a. Yes. ☐ THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON

DATE:

b. No. ☑ PROGRAM IS NOT COVERED BY E. O. 12372

☐ OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW

17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?

☐ Yes If "Yes" attach an explanation. ☑ No

18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.

a. Authorized Representative

Prefix Mr.	First Name J.	Middle Name Jacob
Last Name Sipe		Suffix Jr.
b. Title Executive Director		c. Telephone Number (give area code) 317-232-7777
d. Signature of Authorized Representative		e. Date Signed May 15 2013