



**Root Policy Research**

6740 E Colfax Ave, Denver, CO 80220

[www.rootpolicy.com](http://www.rootpolicy.com)

970.880.1415

**Final Report—Amendment**

**State of Indiana 2023  
Action Plan**

**PREPARED FOR:**

Office of Community and Rural Affairs  
Indiana Housing and Community Development Authority  
[www.in.gov/ocra](http://www.in.gov/ocra)  
[www.in.gov/ihcda](http://www.in.gov/ihcda)

**CREATED**

04/08/2024

# 2023 ACTION PLAN—AMENDED

---

REVISED CDBG MOD

**STATE OF INDIANA**

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

**INDIANA OFFICE OF COMMUNITY AND RURAL AFFAIRS  
FY 2023 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 (OCRA), 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). Per 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 according 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 2023. **The State of Indiana's allocation of federal Community Development Block Grant (CDBG) funds for FY 2023 is \$30,789,752.**

This document applies to all federal Small Cities CDBG funds allocated by HUD to the State of Indiana, through OCRA.

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 emphasize 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.

OCRA 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 personnel) when making funding decisions respective to applications for CDBG funding.

## PROGRAM AMENDMENTS

OCRA reserves the right to transfer up to twenty-five percent (25%) of each fiscal year's available allocation of CDBG funds between the programs described herein to optimize the use and timeliness of distribution and expenditure of CDBG funds, without formal amendment of this Annual Action Plan.

OCRA will provide citizens and general units of local government with reasonable notice and opportunity to comment on any substantial change to be made in the use of CDBG funds for any open grant year. "Substantial Change" shall mean the movement between programs of more than twenty-five percent (25%) of the total allocation for each fiscal year's CDBG allocation. The twenty-five percent (25%) does not include the reallocation of reverted funds. OCRA, in consultation with the Indianapolis office of the HUD, will determine those actions, which may constitute a "substantial change."

OCRA will submit any Consolidated Plan, Annual Action Plan, or other related documents to HUD before it implements any changes embodied in the given document and before posting the final version publicly.

## 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 OCRA's CDBG program. However, the OCRA reserves the right to prioritize funding of those eligible activities; the OCRA prefers to expend federal CDBG funds on activities/projects which will produce tangible results for 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 each fiscal year's 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 areas eligible for "entitlement" funding from HUD.
2. All Indian tribes meeting the criteria outlined in Section 102 (a)(17) of the Federal Act.

To be eligible for CDBG funding, applicants may not be suspended from participation in any CDBG funded programs or by OCRA due to findings/irregularities with previous CDBG grants, overdue reports, overdue responses to monitoring issues, or overdue closeout documents on current grants, or other reasons that call into an applicant's ability to be able to comply with all elements of the State's CDBG program. In addition, applicants may be suspended from participation in the state CDBG-funded projects administered by the Indiana Housing & Community Development Authority (IHCDA).

All applicants must fully expend all CDBG Program Income as defined in 24 CFR 570.489(e) before, or as a part of the proposed CDBG-assisted grant, to be eligible for further CDBG funding from the State.

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

## FY 2023 FUND DISTRIBUTION

### Sources of Funds:

FY 2023 CDBG Allocation	<b>\$30,789,752</b>
CDBG Program Income	<b><u>\$1,662,906.57</u></b>
<b>Total:</b>	<b>\$32,452,658.57</b>

### Uses of Funds:

1. Owner Occupied Rehabilitation	\$ 3,000,000.00
2. Stellar Pathways Program	\$ 0.00
3. Blight Clearance Program	\$ 500,000.00
4. Main Street Revitalization Program	\$ 0.00
5. Public Facilities Program	\$ 1,500,000.00
6. Wastewater Drinking Water	\$18,500,000.00
7. Stormwater Improvements Program	\$ 4,000,000.00
8. PresERVING MainStreet	\$ 2,000,000.00
9. Needs Responsive Fund	\$ 0.00
10. Urgent Need Fund	\$ 0.00
11. Planning Fund	\$ 500,000.00
12. CDBG Program Income	\$1,662,906.57
13. Technical Assistance	\$ 200,000.00
14. Administration	<u>\$ 589,752.00</u>
<b>Total:</b>	<b>\$32,452,658.57</b>

### PROGRAM INCOME POLICY

The State of Indiana via the Office of Community and Rural Affairs (OCRA) does project receipt of CDBG program income for the period covered by this Annual Action Plan. In the event the Office of Community and Rural Affairs (OCRA) receives CDBG Program Income, such funds will be placed in an existing program based on current needs, as determined by OCRA, to make additional grants under that program. Reversions of other years' funding will also be allocated based on current needs as determined by OCRA. OCRA will allocate and expend all CDBG Program Income funds received before 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 IHCDA by OCRA.
2. In accordance with 24 CFR 570.489(e)(2), program income does not cover funds generated by grantees and/or subrecipients from CDBG grants awarded by OCRA that are \$35,000 or less during a calendar year. In such cases, OCRA may allow local governments to keep the funding that doesn't exceed the \$35,000 threshold established by this policy.

3. This prior-use policy shall not apply to program income generated by locally administered revolving loan funds to carry out specific activities. Grantees are not required to use the program income generated before drawing down grant funds awarded by OCRA for a different CDBG funded activity. However, program income in the revolving loan fund must be used before drawing down additional grant funds for other revolving fund activities in accordance with 24 CFR 570.489(f).
4. Any interest earned, above the threshold in accordance 24 CFR 570.489(e)(2)(iv)(C), on a deposit of CDBG grant funds before disbursement of those funds for an eligible CDBG activity will be considered CDBG program income by OCRA. Interest earned should subsequently be used as a credit toward additional claims submitted, reducing the payment of a future claim by the amount of interest earned.

### **Program Income Generated by a Units of General Local Government**

Program income generated by grantees and/or subrecipients from CDBG grants awarded by OCRA must be returned to OCRA if such amounts are equal to or greater than \$35,000 per calendar year according to 24 CFR 570.489.

In accordance with 24 CFR 570.489(e)(2), program income does not cover funds that are \$35,000 or less during a program year. In such cases, OCRA may allow local governments to keep the funding that doesn't exceed \$35,000.

If a local government or its subrecipients receive program income, it must be reported to OCRA annually if it equals or exceeds \$35,000 per calendar year. This income retains its CDBG federal identity in accordance with 24 CFR 570.489.

All obligations of CDBG program income by grantee require prior approval by the OCRA. This includes the use of program income as matching funds for CDBG-funded grants from IHEDA. Applicable parties should contact the CDBG Program Director for guidance on the use of program income before the obligation of such funds.

Local governments that have been inactive in using their program income are required to return their program income to OCRA. Local governments that have been approved to use their program income to fund at least one project in the previous twelve (12) months will be considered active.

Furthermore, US Department of Treasury regulations require that CDBG program income cash on hand balances be expended on any active CDBG grant being administered by a grantee before additional federal CDBG funds can be requested from OCRA. These US Treasury regulations apply to projects funded both by IHEDA and OCRA. 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 OCRA or IHEDA.

### **Revolving Loan Fund (RLF) Program Income by a Units of General Local Government**

If OCRA permits Units of General Local Government to establish locally administered revolving loan funds to carry out specific activities in accordance with 24 CFR 570.489 (f), program income generated by the RLF shall refer to the repayment of CDBG funds received by borrowers including principal and any interest earned without regard to the amount collected.

Local revolving fund balances must be held in an interest-bearing account in accordance with 24 CFR 570.500(b).

Program income collected by Grantees should only be maintained in a local revolving loan fund account for a short period of time before they are awarded back out to new local applicants. Units of General Local Government must ensure any RLF funds held are revolved in order for the account to be considered active by OCRA in accordance with 24 CFR 570.489(f).

It is OCRA's policy that grantees with local revolving loan funds must report on any program income earned and the RLF's activity on a quarterly basis. This report should be governed by guidelines provided by OCRA to its grantees in order to ensure the timely and proper reporting of any RLF program income generated.

Local governments who do not forgive loans issued as part of a CDBG funded RLF program will continue to generate program income and must continue to report on in perpetuity on each loan made until all payments have been paid in-full, forgiven, or written off.

#### **Transfer of Program Income Generated by Other HUD Funded Awards**

At closeout of a HUD funded award including, but not limited to, CDBG, CDBG Disaster Recovery (CDBG\_DR), CDBG Cares Act (CDBG CV), and the Neighborhood Stabilization Program (NSP), program income on hand or subsequently received by a grantee or subrecipient generated by that award may become program income of OCRA's CDBG formula grant program. Grantees may transfer any amount of program income collected to OCRA. Program income generated by a grantee or its subrecipients that is transferred to OCRA continues to be subject to all CDBG requirements as outlined in 24 CFR 570.504(b)(3), even after closeout is achieved, until all program income is fully expended.

The transfer of program income generated by other HUD funded awards must comply with CPD 14- 02: Closeout Instructions for Community Development Block Grant (CDBG) Programs Grant.

OCRA will assess the best use of any program income transferred to CDBG based current needs and any applicable HUD guidance. Grantees must maintain an inventory of acquired real property and equipment and must properly report any new program income generated as instructed by HUD.

#### **METHOD OF DISTRIBUTION**

The choice of activities on which the State's CDBG funds are expended has been determined through a robust review that engaged a variety of stakeholders and considered comments from the public. The eligible activities enumerated in the following Method of Distribution are eligible activities as provided for under Section 105(a) of the Federal Act, as amended.

All projects/activities funded by the OCRA 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

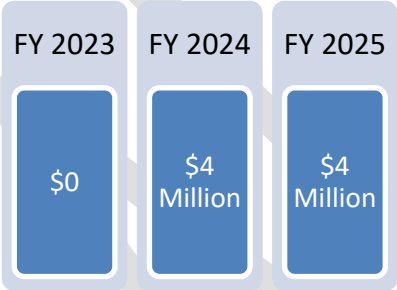
distributed according to the following Method of Distribution (program descriptions):

**A. Owner Occupied Rehabilitation Program: \$3,000,000**

OCRA will allocate \$3,000,000 of its FY 2023 funds for OOR. OCRA will award such grants that meet the minimum scoring criteria outlined in Attachments C and D on a quarterly basis. The OOR program shall have a maximum grant amount of \$350,000 for non-entitlement, incorporated cities/towns and \$500,000 for counties. Matching funds of at least 10% of the total project cost are required for all this program.

**B. Stellar Pathways Program: \$ 0**

OCRA will allocate \$0 of its FY 2023 CDBG funds for Stellar Pathways. Funds will be allocated to designees in the Action Plan for the fiscal year an application is anticipated from each active designee. Here is a breakdown of the Stellar allocation for FY 2023, FY2024, and projected allocation for FY 2025:



Indiana’s Stellar Pathways Program is a collaborative effort of the Office of Community and Rural Affairs (OCRA), the Indiana Housing and Community Development Authority (IHCD), Indiana State Department of Agriculture (ISDA), Indiana Destination Development Corporation (IDDC), Indiana Department of Health (IDOH), Indiana Department of Natural Resources (DNR), and the Indiana Department of Transportation (INDOT).

The Stellar Pathways Program seeks to engage four (4) regions to achieve a holistic, three-year revitalization strategy that will leverage unified state investment and other available funding from the partnering agencies to complete transformational projects. In the revitalization strategy, selected finalists will identify areas of interest and types of projects along four pathways (Advancing e-Connectivity, Enhancing Quality of Place, Promoting Community Wellness, and Strengthening Local Economies) following robust community outreach and engagement and through facilitated, pathway-specific focus groups. The resultant Strategic Investment Plan (SIP) will produce a schedule to complete projects, cost estimates, identify local match amounts and additional funding resources needed, indicate the level of community impact, and describe the significance each project will have on the overall comprehensive revitalization of the region. Each partnering agency will choose catalyst projects to fund from each SIP, setting communities along a path to become Stellar upon completion of all selected projects.

Evaluation and selection of the final regions to the Stellar Pathways Program will be based on:

- Letter of Intent submitted
- Completion of all outlined requirements of the Stellar Pathway Finalist designation.
- Document the level of need and significance of each project in overall community revitalization efforts.



- Capacity of the applicant to complete all activities and to administer the funds;

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 IHCD 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 IHCD with HOME, ESG and/or HOPWA funds will meet the specific requirements set forth by those programs.

**C. Blight Clearance Program: \$500,000.00**

OCRA will allocate \$500,000 of its FY 2023 CDBG funds for the Blight Clearance Program (BCP). OCRA will award such grants that meet the minimum scoring criteria outlined in Attachment D on a competitive basis. The BCP shall have a maximum grant amount of \$500,000. The amount of CDBG funds granted will be limited to \$5,000 cost per project beneficiary. Matching funds of at least 10% of the total project cost are required for all this program.

**D. Main Street Revitalization Program: \$0**

OCRA will allocate \$0 of its FY 2023 CDBG funds for the Main Street Revitalization Program (MSRP).

~~OCRA will award MSRP grants to eligible applicants to assist Indiana communities with streetscape and façade activities intended to revitalize their downtown area. Each applicant must meet the following prerequisites:~~

- ~~1) Have a designated Indiana Main Street Organization that:
 
  - ~~a. is nationally accredited, or~~
  - ~~b. is a traditional Indiana Main Street that is at least three (3) years old;~~~~
- ~~2) The Main Street Organization is in good standing and has met all the reporting requirements;~~
- ~~3) The Main Street Organization has attended all required workshops associated with the Indiana Main Street Program during past calendar year;~~
- ~~4) The Main Street organization is functioning within the Main Street 4 Point Approach of Organization, Design, Economic Vitality, 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 Community has completed a downtown revitalization plan within the past five (5) years that meets OCRA's Minimum Plan Requirements. If a community has an alternative plan that meets OCRA's Minimum Plan Requirements for a downtown revitalization plan, they can use that alternative plan with approval from the CDBG Program Director.~~
- ~~7) The Indiana Main Street Organization has been involved in the project development process for the application and there is a plan for their continued involvement if awarded.~~

~~Applications will be accepted in rounds and awards will be made on a competitive basis. The specific threshold criteria and basis for scoring are provided in Attachment C and D hereto. The MSRP shall have a maximum grant amount of \$600,000. The amount of CDBG funds granted will be limited to \$5,000 cost per project beneficiary. Matching funds of at least 20% for streetscape project and 30% for façade projects of the total project cost are required for all this program.~~

~~To encourage communities and Main Street organizations to achieve National Main Street Accreditation, OCRA will set aside \$600,000 of this allocation for projects that come from communities that have nationally accredited Main Street Organizations.~~

~~Grantees must ensure that local Indiana Main Street Organization remains in good standing with OCRA until the completion of the project. If the local Indiana Main Street Organization falls out of good standing then deobligation or repayments of CDBG funds is possible.~~

**E. Public Facilities Program: \$1,500,000**

OCRA will allocate \$1,500,000 of its FY 2023 CDBG funds for the Public Facilities Program (PFP).

Applications will be accepted in rounds and awards will be made on a competitive basis. The specific threshold criteria and basis for scoring are provided in Attachment C and D hereto. The PFP shall have a maximum grant amount of \$500,000. The amount of CDBG funds granted will be limited to \$5,000 cost per project beneficiary. Matching funds of at least 10% of the total project cost are required for all this program.

**F. Wastewater Drinking Water: \$ 18,500,000**

OCRA will allocate \$18,500,000 of its FY 2023 CDBG funds for the Wastewater Drinking Water (WDW).

Applications will be accepted in rounds and awards will be made on a competitive basis. The specific threshold criteria and basis for scoring are provided in Attachment C and D hereto. WDW shall have a maximum grant amounts based on present combined user rates (water, wastewater, and stormwater) as shown in the matrix below. The amount of CDBG funds granted will be limited to \$5,000 cost per project beneficiary. Matching funds of at least 20% of the total project cost are required for all this program.

Maximum Grant Amounts	Rates for 4,000 gallons		
	User Rates (Over \$70)	User Rates (\$40 to \$70)	User Rates (Under \$40)
Projects over \$1 million in total project cost	\$700,000	\$600,000	\$550,000
Projects under \$1 million in total project cost	\$600,000	\$550,000	\$500,000

**E. Stormwater Improvements Program: \$4,000,000**

OCRA will allocate \$4,000,000 of its FY 2023 CDBG funds for the Stormwater Improvements Program (SIP).

Applications will be accepted in rounds and awards will be made on a competitive basis. The specific threshold criteria and basis for scoring are provided in Attachment C and D hereto. The SIP shall have a maximum grant amount of \$600,000. The amount of CDBG funds granted will be limited to \$5,000 cost per project beneficiary. Matching funds of at least 10% of the total project cost are required for all this program.

**F. PreserviNG Main Street: \$2,000,000**

Preserving Main Street will assist one (1) Nationally Accredited Main Street (NAMS) or Indiana Accredited Main Street (IAMS) community with historic preservation and economic revitalization efforts over a two (2) year period.

Applications from NAMS and IAMS communities with registered downtown historic districts will be accepted in a single round every other program year and awards will be made on a competitive basis. The selected community will be eligible for \$2,000,000 in set aside funds to implement downtown preservation projects based on a two-year preservation and revitalization strategy for their downtown historic district.

The Main Street organization, along with the community foundation and LUG, will be responsible for raising a 10% match (\$200,000) for the project, which could include a mix of private and local funds. The total match must be raised before the end of the 2-year pilot.

Of that 10%:

- 50% will be put in a permanent endowment/revolving loan fund for downtown projects
- 50% will be supplied to the Main Street organization for long-term sustainability.  
For example, this could be used for two years of funding a staff position and thus elevating an IAMS community to a NAMS within those two years

Additionally, Indiana Landmarks will work with the Main Street organization and local building owners to provide training and conditions assessments for preservation projects in downtown. The LUG will develop and adopt a local preservation ordinance, lead the formation of a local preservation commission, and pursue designation of a downtown local historic district within the first 18 months.

The Main Street organization will also implement two humanities-based programs and activities focused on historic preservation using Indiana Humanities funding distributed in two tranches. The selected Main Street organization will also attend trainings provided by Indiana Humanities.

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.

**G. Needs Responsive Fund: \$0**

OCRA will allocate \$0 of its FY 2023 CDBG Funds to the Needs Responsive Fund. The purpose of this fund is to allow OCRA flexibility to respond to the needs of eligible communities. Specifically, this program will allow OCRA to fund projects that are eligible activities under CDBG, but are not covered by other programs.

OCRA will award such grants that meet the minimum scoring criteria outlined in Attachment D throughout the program year. The Needs Responsive Fund shall have a maximum grant amount of \$1,000,000. The amount of CDBG funds granted will be limited to \$5,000 cost per project beneficiary. Matching funds of at least 10% of the total project cost are required for all this program.

**H. 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.

#### **I. Planning Grants: \$ 500,000**

OCRA will allocate \$500,000 of its FY 2023 CDBG funds for planning-only activities. OCRA 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. OCRA will award such grants that meet the minimum scoring criteria outlined in Attachments C and D on a quarterly basis. The Planning Grant program shall have a maximum grant amount of \$90,000. The amount of CDBG funds granted will be limited to \$5,000 cost per project beneficiary. Matching funds of at least 10% of the total project cost are required for all this program.

A list of eligible plans and their specific maximum grant amounts is available on OCRA's CDBG website. The Office reserves the right to prefer one type of plan over other types of plans when making awards.

The specific threshold criteria and basis for scoring for Planning Grant are provided in Attachment C and D hereto. 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.

#### **J. Technical Assistance Set-aside: \$200,000**

Pursuant to the federal Housing and Community Development Act (Federal Act), specifically Section 106(d)(5), the State 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 2019 Action Plan

is \$200,000, which constitutes less than one-percent (1%) of the State's FY 2020 CDBG allocation of \$30,500,000. 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. The Technical Assistance Program will also be used by the Office to conduct pilots of new programs or adjustments to current programs.

**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 cannot 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.

**K. Administrative Funds Set-aside: \$589,752**

The State (Office of Community and Rural Affairs) will set aside up to \$589,752 of its FY 2023 CDBG funds for payment of costs associated with administering its State Community Development Block Grant (CDBG) Program (CFDA Number 14.228). This amount (\$589,752) constitutes less than two-percent (2%) of the State's CDBG allocation (\$30,789,752). The amount of \$489,752 is subject to the \$1-for-\$1 matching requirement of HUD regulations. A \$100,000 is not subject to state match per HUD regulations. 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 Annual Action Plan and statement of Method of Distribution is intended to amend all prior Consolidated and Action 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, unless subsequently amended, for all FY 2023 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.

In the case that prior years' funds should become available, they will be placed in any of the currently open programs and become subject to the requirements and allowances set forth in this plan. Non-expended funds, which revert from the financial settlement of projects funded from other programs, will be placed in any open program for use in that ongoing program.

### **APPLICATION PROCESSES**

Planning Grant applications and Owner-Occupied Rehabilitation (OOR) applications are accepted on a quarterly basis. Eligible units of local governments should first contact their regional Community Liaison to discuss their interest in a planning or OOR grant. Then, an initial application can be submitted for scoring.

Stellar Pathways Program is a single competitive application process. Interested applicants submit a Letter of Intent from which up to four (4) finalists are selected by the partner organizations. Finalists take part in numerous capacity-building, teamwork, and planning activities throughout the year as they build their Strategic Investment Plan (SIP). Each finalist must complete an SIP. The Stellar Teams will review completed plans for Catalyst Projects. Each agency then allocates funding to projects within the SIP based on alignment with the requirements of each funding source and will work collaboratively to have fundable projects for each community identified as a finalist.

PreservINg Main Street is a single competitive application process held every other year. Interested applicants submit a Letter of Intent from which up to one (1) will be selected to participate by OCRA the partnering organizations.

The application process for the Blight Clearance Program (BCP), Public Facilities Program (PFP),

Stormwater Improvements Program (SIP), the Main Street Revitalization Program (MSRP), and the Wastewater Drinking Water (WDW) will be a two-stage competitive application process held twice each calendar year with a third-round possible.

For grant programs with a two-stage process, eligible applicants will first submit an abbreviated proposal. After submitting a 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. OCRA, as applicable, will provide technical assistance to the communities in the development of full applications and require an in-person site visit with the community prior to application.

An eligible applicant may submit only one application at a time. OCRA reserves the right to deny applications lacking credible readiness to proceed.

### **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 of the Code of the Federal Register, and with consideration to non-regulatory guidance from HUD. 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 OCRA's 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 Handbook, which is posted on the Office's website.

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.

DRAFT



## **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 heads OCRA. Principal responsibility for the CDBG program is vested in the Executive Director of OCRA. OCRA also has the responsibility of administering compliance activities respective to CDBG grants awarded to units of local government through a partnership with the Grant Services Division of the Lieutenant Governor's business office.

Primary responsibility for providing "outreach" and technical assistance for the Stellar Regions Program, Main Street Revitalization Fund, Stormwater Improvement Program, Wastewater Drinking Water, Public Facilities Program, and Planning Grants process resides with the OCRA. 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 OCRA.

The LG's Business Office will provide internal fiscal support services for program activities. The OCRA has the responsibility for the development of the Consolidated Plan and the CAPER, CDBG program management, compliance and financial monitoring of all CDBG programs. The Indiana State Board of Accounts pursuant to 2 CFR 200 will conduct audits. Potential applicants should contact the OCRA with any questions or inquiries they may have concerning these or any other programs.

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

**Indiana Office of Community and Rural Affairs  
CDBG Program Director  
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 CDBG Program Director.

**Matching funds** - local public or private sector in-kind services, cash or debt allocated to the CDBG project. The level of local matching funds required for CDBG projects based on each program. This percentage is computed by adding the proposed grant amount and the local matching amount, and dividing the local matching funds amount by the total sum of the two amounts. The definition of match includes a maximum of 5% pre-approved and validated in-kind contributions. The balance of the match requirement 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. Other funds provided to applicants by OCRA are not eligible for use as matching funds.

**Proposal** - 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. OCRA encourages communities to submit a proposal that is basically a draft of the 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 OCRA 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). More Specifically, OCRA defines blight as:

An area possessing a substantial amount of buildings (public or privately owned), and or public improvements which demonstrate:

1. General deterioration, seen through:
  - a. Neglect or lack of maintenance on the property; or
  - b. Facilities of plumbing, heating, sewage, and/or others that have been disconnected, destroyed, removed, or rendered inadequate; or
  - c. Impaired structural condition, making the building(s) unsafe to a person or property (IC 36-7-9-4); or
  - d. Any combination of these factors
2. Significant noncompliance with current building code, safety code, health code, fire code, state statute, or local ordinance, as seen by:
  - a. Excessive vacancy and/or abandonment of properties; or
  - b. Environmental hazards; or
  - c. Fire hazards; or
  - d. Lack of ventilation, light, or sanitary facilities; or

- e. any combination of these factors
- 3. Building(s) are conducive to ill health, transmission of disease, infant mortality, juvenile delinquency, increased criminal activity compared to other areas, and detrimental to public health, safety, morals, or welfare through any of the following conditions:
  - a. Age; or
  - b. Dilapidation; or
  - c. Overcrowding of structures and/or high density population; or
  - d. Excessive land coverage; or
  - e. Impairment of overall economic vitality of community through declines in property value, substantially lower property value than surrounding community areas; or
  - f. any combination of these factors

**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).

**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):**

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 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.
8. To be eligible to apply at the time of an application submission, an applicant must not have any of the following:
  - a. Overdue grant reports, sub-recipient reports or project closeout documents; or
  - b. More than three (3) CDBG grants that are open or pending award (Indiana cities and incorporated towns), or four (4) CDBG grants that are open or pending award (Indiana counties) from OCRA;
  - c. For those applicants with an open MSRP, WDW, PFP, SIP or BCP a “Notice of Release of Funds and Authorization to Incur Costs” must have been issued for the construction activities under the open MSRP, WDW, PFP, SIP or BCP 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 MSRP, SIP, WDW, PFP, or BCP application for the project.

9. To be eligible to apply at the time of application submission, an applicant must not have:
- a. Any unresolved complaints filed against the applying party with the Indiana Civil Rights Commission or any other local human relations commission with jurisdiction (collectively “Commissions”)<sup>1</sup>
    - i. A complaint during the investigation stage can be resolved for the purposes of this application if the applying party provides the response it submitted to the Commissions and provides verification that it is cooperating in the investigation.
    - ii. To resolve a complaint for the purposes of this application that has received a finding of Probable or Reasonable Cause, the complaint must be closed in a manner that includes the applying party taking a fair housing training and implementing a relevant policy to prevent future possible discriminatory incidents. The applying party need not take the training or implement the policy prior to the application being submitted if the applying party can provide proof that it intends to complete the training and implement the policy within a reasonable period of time. If a complaint has been closed and the closure did not include training or the implementation of a policy, then the applying party can elect to contact the Commissions to voluntarily complete training and have Commissions assist in the implementation of a relevant policy.
    - iii. To resolve a complaint that merits litigation, the applying party must submit evidence that the complaint cannot be settled (i.e. settlement ask too high etc.) and evidence that training and a policy are not the impediments to settlement. Possible evidence can include offer letters, statements of disputed legal questions, statements of disputed facts, statements on behalf of the Commissions that they are unwilling to settle the case, or any similar document that illustrates the case is not ripe for settlement.
  - b. An unresolved pattern of complaints filed against the applying party with the Indiana Civil Rights Commission or any other local human relations commission with jurisdiction (collectively “Commissions”)
    - i. A pattern for purposes of this application is defined as any more than an average of two complaints over a period of four years, regardless of outcome.
    - ii. To resolve a pattern of complaints for purposes of this application, the applying party must partner with the Commissions or other equivalent housing organization to fully review the applying party’s current policies for best practices as well as for compliance with the Indiana Fair Housing Act and Indiana Civil Rights Law. Additionally, the applying party must show proof that the applying party intends to undergo annual fair housing training for all of its employees that regularly interact with tenants and biannual training for all supervising employees for at least one year.

10. The cost/beneficiary ratio for all CDBG funds will be maintained at \$5,000.

---

<sup>1</sup> If agreeable, it would be the Indiana Civil Rights Commissions obligation to provide timely responses as well as to provide data retrieved from other relevant local human relations commissions.

11. Required leveraging based on program (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.
12. 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.
13. The application must be complete and submitted by the announced deadline.

**GRANT EVALUATION CRITERIA  
700 POINTS TOTAL**

Applications must achieve a minimum score of 450 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.

**1. 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:

$$\text{National Objective Score} = \% \text{ Low/Mod Beneficiaries} \times 1$$

**2. National Objective = Prevention or Elimination of Slums or Blight:** 100 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)**

- Applicant has a Slum/Blight Resolution for project area (50 pts.)
- The project site is a brownfield\* (25 pts.)
- The building or district is listed on or 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. Points are awarded for sites listed on the IFA Brownfield registry which indicates prior involvement of the Indiana Brownfields Program or a letter is provided from the IFA Brownfield program that states the site is a brownfield.

**COMMUNITY DISTRESS FACTORS (175 POINTS):**

Various factors are used to determine the distress of a community. OCRA 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:

- Poverty Rate**
- Median Household Income**
- Unemployment Rate**
- Non-seasonal Housing Vacancy Rate**
- Housing Cost Burden**
- Population Change (10-year % Change)**

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

$$\text{Total Match Points} = \% \text{ Eligible Local Match} \times 1$$

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 CDBG Program Director approximately 1-2 weeks prior to application submission (date of deadline will be announced each round).

### **PROJECT DESIGN FACTORS (300 POINTS):**

A maximum of 300 points 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 documented and compelling? – 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 Scoring Committee when evaluating the projects. Scoring questions for these categories are defined for each round and are provided to applicants that submit a proposal at the site visit. The questions are subject to change each round. **Applicants should refer to the application packet, scoring guide and other resources to address all questions present.** Applicants are encouraged work with their OCRA Community Liaison to identify ways to increase their project's competitiveness in these areas and of the application as a whole.

### **PROGRAM SPECIFIC POINTS (50 POINTS):**

#### **Blight Clearance Program (BCP)**

- **IFA Registry** - A maximum of 25 points awarded for sites registered with the IFA Brownfield program which indicates prior involvement of the Indiana Brownfield Program or a letter is provided from the IFA Brownfield program that states the site is a brownfield.
- **Site Development Plan** - A maximum of 25 points will be awarded for projects that have a site development plan for the future use of the Brownfield site.

#### **Owner Occupied Rehabilitation (OOR)**

- **Targeted Populations:** A maximum of 25 points will be awarded to applicants whose program design parameters prioritize funding assistance to households that belong to at least one of the targeted population groups listed below.
  - Individuals with Disabilities Households with at least one individual living in the home with a disability using the Fair Housing definition of disabled as defined by HUD.
  - Aging in Place Households with at least one elderly individual, as defined by HUD Glossary, living in the home. Repairs made to the home must address accessibility and/or livability.
  - Veterans Households with at least one veteran individual, as defined in HUD, living in the home.
  - Single Parent Head of Household Households with a single parent, grandparent, or guardian head of household.

Household(s) must be the primary residence for qualifying individual(s). Individuals or households that meet the criteria for two or more categories (i.e. a veteran with a disability or a single parent household with a child with a disability) may only be counted for one of the categories in which they qualify.

- **New Administrator Experience:** A maximum of 25 points will be awarded to applicants who are working with administering entities who can demonstrate prior experience in construction management, rehabilitation of built structures, and/or prior CDBG OOR experience through a different funding agency. Applicants must provide a written narrative explaining previous relevant experience and a third-party reference of experience in the above-mentioned fields to receive these points.
  - Less than 3 years – 10 Points
  - Between 3 to 5 years – 15 points
  - Greater than 5 years – 25 Points

### Planning Grants (PL)

- **Community Input and Collaboration** – A maximum of 25 points are awarded for communities that document public input and collaboration efforts beyond letters of support and the two required Public Hearings.
- **Connection to Previous Planning Effort** – A maximum of 15 points are awarded for documentation that the plan that is being applied for connects to a previous planning effort done by the community.
- **Implementation of Previous Plan or First-time Plans** – A maximum of 10 points are awarded for communities that document the successful implementation of a previous planning grant plan or for communities that have never receive an planning grant before.

### Public Facilities Program (PFP)

- **Philanthropic Contributions** - Points are assigned based on philanthropic contribution to the project (match) as a percentage of total project costs.
  - Less than 1% - 0 points
  - 1-1.99% - 10 points
  - 2-2.99% - 15 points
  - 3-3.99% - 20 points
  - 4%+ - 25 points
- **Project Sustainability** - A maximum of 25 points for the establishment of a (or documentation of existing) permanent Community Facility Fund, to be used for ongoing operation and maintenance activities of the project.
  - 0 points – Less than \$3,000
  - 10 points - \$3,000-\$5,000
  - 25 points – More than \$5,000

### Main Street Revitalization Program (MSRP)

- ~~Community is designated as a Nationally Accredited Main Street Organization (10 points)~~
- ~~The district is listed on the Indiana or National Register of Historic Places (5 points)~~
- ~~Documentation of active and continued involvement in the application and project by the Main Street organization (10 points)~~
- ~~The Main Street Organization has a long-term Strategic Plan. (Maximum of 5 points)~~
- ~~The Main Street Organization has a sustainability/fundraising plan in place. (Maximum of 5 points)~~
- ~~For streetscape projects:~~
  - ~~The project has unique design elements or is part of a community branding effort. (Maximum of 15 points)~~
- ~~For façade projects:~~

- ~~Up to 15 points can be awarded for projects that have a lower density. Density is calculated as the Linear Feet (LF) of all the facades in the project divided by the total Linear Feet (LF) of building frontage within the project area. Points are awarded as follows:~~
  - ~~0 points – Less than 30%~~
  - ~~5 points – 30%–40%~~
  - ~~10 points – 40%–50%~~
  - ~~15 points – More than 50%~~

### **Wastewater Drinking Water (WDW)**

- **Financial Gap** – A maximum of 10 points per each \$1 in financial gap. The result of the OCRA Gap Calculation Worksheet is the amount that your community would have to increase the monthly utility rate charged to each customer without grant assistance. This is the “gap,” which is the amount by which grant funds will reduce or “buy down” your utility rates. This amount added to the actual rates anticipated with OCRA grant funds will give you the rates needed “without OCRA grant funds”. (Maximum 10 points)
- **Green Infrastructure** – A maximum of 15 points for the inclusion of green infrastructure elements in the project. (Maximum of 15 points)
- **Project Sustainability** - A maximum of 25 points for the establishment of, or documentation of existing combined utility rate for the ongoing operation and maintenance activities of the wastewater and drinking water systems.
  - 0 points – Less than \$40 combined user rates
  - 10 points – \$40-\$70 combined user rates
  - 25 points – More than \$70 combined user rates

### **Stormwater Improvement Program (SIP)**

- **Financial Gap** – A maximum of 10 points per each \$1 in financial gap. The result of the OCRA Gap Calculation Worksheet is the amount that your community would have to increase the monthly utility rate charged to each customer without grant assistance. This is the “gap,” which is the amount by which grant funds will reduce or “buy down” your utility rates. This amount added to the actual rates anticipated with OCRA grant funds will give you the rates needed “without OCRA grant funds”. (Maximum 10 points)
- **Green Infrastructure** – A maximum of 15 points for the inclusion of green infrastructure elements in the project. (Maximum of 15 points)
- **Project Sustainability** - A maximum of 25 points for the establishment of, or documentation of an existing stormwater utility rate for the ongoing operation and maintenance activities of the storm system.
  - 0 points – under \$3 monthly Stormwater utility user rate
  - 10 points – \$3-\$5 monthly stormwater utility user rate
  - 25 points – \$5 or higher monthly stormwater utility user rate

### **BONUS POINTS POLICY:**

It is OCRA’s policy to encourage and support regional coordination amongst rural communities. As such, a grant application that is included in a regional plan will be awarded 25 bonus points. To receive these bonus points requires verification of the regional plan from the CDBG Program Manager approximately two weeks before application submission (deadline will be announced each round).

**Regional Planning – 25 points**

### **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, *except OOR\**, 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 following point reduction:

**0 – 5 years since previous funding – -50 points**

**Example:** Community submits and receives a Wastewater Drinking Water (WDW) grant in 2015. When applying for a WDW grant in 2020, they would be subject to a point reduction of 50 pts. In 2021 they would have no point reduction.

\*For OCRA funded OOR projects, eligible communities may reapply to receive additional OOR funding after all prior OOR grants awarded to them by OCRA have achieved closeout.

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

The Citizen Participation Plan (CPP) herein is the CPP established for the State of Indiana's Five Year Consolidated Plan for Housing and Community Development, covering program years 2020-2024. The CPP was developed around a central concept that acknowledges residents as stakeholders and their input as key to any improvements in the quality of life for the residents who live in a community.

Each program year affords Indiana residents an opportunity to be involved in the process. Citizens have a role in the development of the Consolidated Plan, annual Action Plans, and Consolidated Annual Performance and Evaluation Reports regardless of age, gender/sex, race, ethnicity, national origin, disability, familial status, religion, and economic level.

### **Purpose of the Citizen Participation Plan**

The Citizen Participation Plan (CPP) describes the process the state uses to collect public input and involve the public in development of the Five Year Consolidated Plan. The CPP also addresses how the state obtains public comment on its Annual Action Plan and Consolidated Annual Performance and Evaluation Report (CAPER). This CPP was developed in accordance with Sections 91.110 and 91.115 of HUD's Consolidated Plan regulations. The purpose of the CPP is to provide citizens of the State of Indiana residents residing in communities eligible to receive housing and community development funds from the state maximum involvement in identifying and prioritizing housing and community development needs in the state, and responding to how the state intends to address such needs through allocation of the following federal grants:

- Community Development Block Grant (CDBG);
- HOME Investment Partnerships Program funding (HOME);
- Emergency Solutions Grant (ESG);
- Housing Opportunity for Persons with AIDS (HOPWA) funding; and
- National Housing Trust Fund (NHTF) funding.

This Consolidated Plan typically covers a five-year timeframe. The state's Consolidated Plan is a comprehensive strategic plan for housing and community development activities. The purpose of programs and activities covered by this Consolidated Plan is to facilitate provision of decent housing, a suitable living environment, and growing economic opportunities, especially for low to moderate income residents.

**Subrecipient requirements.** 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.

**Encouraging citizen participation.** The state recognizes the importance of public participation in both defining and understanding current housing and community development needs and prioritizing resources to address those needs. The state's CPP is designed to encourage citizens of Indiana equal access to become involved each year.

### **Development of the Plans and Performance Reports**

This document outlines how residents and stakeholders of the State of Indiana may participate in the

development and review of the state's Five Year Consolidated Plan, each annual Action Plan, each CAPER, and any substantial amendments to a Consolidated Plan and/or Action Plan. The State of Indiana's program year begins July 1 and ends June 30.

The Indiana Office of Community and Rural Affairs (OCRA) and the Indiana Housing and Community Development Authority (IHCDA) are responsible for implementing and reporting on all aspects of the Consolidated Plan process. The following schedule provides an approximate timeline for the Consolidated Plan, annual Action Plan, and the CAPER.

**Annual schedule.** Annually, the preparation of the Action Plan, stakeholder consultation, and citizen engagement approximates the following. This schedule can change based on the timing of funding allocations from HUD, HUD guidance or directives, and/or states of emergency that affect report submissions.

**July:**

Begin Consolidated Annual Performance and Evaluation Report (CAPER) process

**September:**

15<sup>th</sup>: Begin 15-day Public Comment period for CAPER

30<sup>th</sup>: CAPER submitted to HUD

**November through February:**

Develop narrative of Annual Action Plan or Five Year Consolidated Plan

Plan community meetings and public hearings

Create and launch surveys

Conduct stakeholder consultation

**January—February—March:**

Conduct public participation process for Consolidated Plan including options discussed below

Draft Consolidated Plan or Action Plan, funding allocation plans/method of distribution (MOD), and policies for public comment

Update funding allocation plan and policies based on stakeholder consultation

**March – April:**

Hold public hearings

**April:**

Finalize plan based on stakeholder consultation and public comment

**May:**

15<sup>th</sup>: Consolidated Plan and Action Plan submitted to HUD

**June:**

End of annual Action Plan year

**Citizen participation and stakeholder consultation.** Annually, the state will choose from the following options for citizen participation and stakeholder consultation into the Plans. These techniques incorporate alternative methods of public process that encourage a broad spectrum of participation and a review of program performance.

**Resident survey.** A survey of Indiana residents could be conducted during the research phase of the Five Year Consolidated Plan in order to gather additional information on housing and community development needs

and priorities for the Consolidated Plan. The survey would be available online using software that is Section 508 compliant. A variety of sampling and distribution methods may be used including a “snowball” sampling technique in which the survey is distributed to housing and community development partners who then circulate the survey to their clients/members. The survey would also be available on agency websites, as part of social media, and in email notifications (e-notifications). The survey would be available in the languages required of the state’s LAP. Special accommodations for persons with disabilities would be made upon request.

**Stakeholder survey and elected official survey.** An online stakeholder survey may be administered to community development organizations, economic development officials, local government leaders and staff, housing developers, housing providers, social service providers, and advocacy organizations, among others. During some Consolidated Plan and Action Plan years, the survey may be conducted in the form of key informant interviews from a voluntary sample of stakeholders from throughout the state.

**Focus groups.** Focus groups may be held with local government leaders and staff, Regional Planning Commissions, advocates for persons with disabilities, Continuum of Care funding recipients, Community Action Agencies and Human Rights Councils, and residents, to gather in-depth information on the challenges Indiana residents face in accessing housing and services in their communities, community and economic development needs, and policy and program changes to address needs.

**Stakeholder interviews.** A series of interviews may be conducted with key persons or groups who are knowledgeable about housing and community development needs in the state.

**Public hearings.** A public hearing will always be conducted during the 30 to 45-day public comment period in virtual formats in five to six locations across Indiana. This meeting will occur at least one month prior to submission of the Plan, generally during the months of March or April. Alternatively, the State may choose to conduct in-person hearings in three to four locations throughout the state. These will occur on different days to encourage maximum participation.

**Written comments.** Written comments will always be accepted at any time during the Consolidated Plan and Action Plan processes in email or in hard copy. Instructions on how to provide comments will be part of public notices and described during the public hearings.

### **Consolidated Plan**

The draft will provide information that includes the amount of assistance the state expects to receive and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income, if available, and the plans to minimize displacement of persons and to assist any persons displaced.

A reasonable notice—generally two calendar weeks—is given to announce to the public the availability of the draft Consolidated Plan. Availability of the draft Plan is advertised through e-notifications that reach community development organizations, economic development officials, local government leaders and staff, housing developers, housing providers, social service providers, and advocacy organizations, among others, and is posted on OCRA and IHCD websites. The state’s current Language Access Plan (LAP) determines the languages in which notice is provided.

A 30 to 45-day public comment period is provided to receive written comments on the draft Plan. The 30 to 45-day comment period usually begins in March or April and ends in April or early May. The draft Plan can be reviewed at OCRA and IHCD websites; emailed or hard copies can be provided upon request. All written comments provided during the Consolidated Plan process will be considered in preparing the final Consolidated Plan. A summary of the comments received and a summary of the state’s reasons for not

accepting any comments will be included in the final Consolidated Plan. The state considers these comments before taking final action on the Consolidated Plan.

The final Consolidated Plan is submitted to HUD no later than May 15 each year, unless extensions are granted (e.g., for federal budget allocation delays, in the case of emergency response needs, etc).

### **Annual Action Plan**

Each year the state must submit an annual Action Plan to HUD, reporting on how that year's funding allocation for the CDBG, HOME, ESG, HOPWA, and NHTF grants will be used to achieve the goals outlined in the Five Year Consolidated Plan. The CPP for preparation of the Action Plan is as follows:

The draft Action Plan will be available for 30 to 45 days to gather public comment on the proposed spending allocation. The state will hold at least one public hearing to describe the state's proposed allocation of the program year's funding allocation during the 30 to 45-day public comment period. The availability of the draft Plan and public hearings will be publicized on OCRA and IHEDA websites and circulated through e-notifications to housing and community development partners. In addition, OCRA and IHEDA will collaborate with stakeholder associations to further distribute the notice of the draft plan to their memberships and networks.

The public hearing will be conducted virtually and broadcast to several locations across the state. Alternatively, the state may choose to conduct in-person hearings in three to four locations throughout the state. These will occur on different days to encourage maximum participation.

During the hearing a facilitator will describe the proposed funding allocation, discuss funding priorities and how they were derived, and instruct attendees on how to submit comments on the draft Plan. In addition, participants will be given an opportunity to provide feedback or comment on the draft Plan. A summary of the public hearing comments will be included in the final Action Plan.

The state will review and consider all written public comments. The final Action Plan that is submitted to HUD will include a section that summarizes all comments or views in addition to explanations of why any comments were not accepted.

### **Consolidated Annual Performance and Evaluation Reports**

Before the state submits a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD, the state will make the proposed CAPER available to those interested for a comment period of no less than 15 days. The availability of the draft Plan and public hearings will be publicized on OCRA and IHEDA websites and circulated through e-notifications to housing and community development partners. In addition, OCRA and IHEDA will collaborate with stakeholder associations to further distribute the notice of the draft plan to their memberships and networks.

The state will consider any comments from individuals or groups received verbally or in writing. A summary of the comments, and of the state's responses, will be included in the final CAPER.

### **Substantial Amendments**

Occasionally, public comments warrant an amendment to the Consolidated Plan. The conditions for whether to amend are referred to by HUD as "Substantial Amendment Criteria." The following conditions are considered to be Substantial Amendment Criteria:

1. A substantial change in the described method of distributing funds to local governments or nonprofit



organizations to carry out activities. “Substantial change” shall mean a reallocation of funds among program categories of programs of more than 25 percent of the total allocation for a given program year’s block-grant allocation.

Elements of a “method of distribution” are:

- Application process for local governments or nonprofits;
  - Allocation among funding categories;
  - Grant size limits; and
  - Criteria selection.
2. An administrative decision to reallocate all the funds allocated to an activity in the Action Plan to other activities of equal or lesser priority need level, unless the decision is a result of the following:
- There is a federal government recession of appropriated funds, or appropriations are so much less than anticipated that the state makes an administrative decision not to fund one or more activities;
  - The governor declares a state of emergency and reallocates federal funds to address the emergency; or
  - A unique economic development opportunity arises wherein the state administration asks that federal grants be used to take advantage of the opportunity.

**Citizen participation in the event of a substantial amendment.** In the event of a substantial amendment to the Consolidated Plan, the state will conduct at least one additional public hearing. This hearing will fall during a comment period of no less than 30 days, during which the proposed Plan amendment will be made available to interested parties. Either IHEDA or OCRA will post information regarding the hearing on their website(s) and send out a notice via their distribution list.

In the event of substantial amendments to the Consolidated Plan, the state will openly consider all comments from individuals or groups submitted at public hearings or received in writing. A summary of the written and public comments on the amendments and the state’s acceptance or rejection of each comment will be included in the final Consolidated Plan.

### **Changes in Federal Funding levels**

Any changes in federal funding level after the Consolidated Plan’s draft comment period has expired, and the resulting effect on the distribution of funds, will not be considered an amendment or a substantial amendment.

### **Availability and Access to Records**

The state provides reasonable and timely access for citizens, public agencies, and other organizations to access information and records relating to the state’s Consolidated Plan, annual Action Plan, CAPERs, substantial amendment(s), the Citizen Participation Plan, and the state’s use of assistance under the programs covered by the plan during the preceding five years.

The Indiana Office of Community and Rural Affairs webpage is [www.in.gov/ocra](http://www.in.gov/ocra) and the Indiana Housing and Community Development Authority webpage is <https://www.in.gov/ihcda/4048.htm> for citizens interested in obtaining more information about state services and programs or to review the plans and CAPERs. A reasonable number of free copies will be available to citizens that request it. Upon request, these documents will be provided in a reasonable form accessible to persons with disabilities.

### **Citizen complaints**

The state will provide a substantive written response to all written citizen complaints related to the Consolidated Plan, Action Plan amendments and the CAPER within 15 working days of receiving the complaint. Copies of the complaints, along with the state's response, will be sent to HUD if the complaint occurs outside of the Consolidated Planning or Action Plan process and, as such, does not appear in the Consolidated Plan.

# 2023 ACTION PLAN—AMENDED

---

REVISED 2023 ACTION PLAN

# Executive Summary

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

### 1. Introduction

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. These grant funds include the: Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), Housing Opportunities for People with AIDS (HOPWA) and the National Housing Trust Fund (HTF). The dollars are primarily meant for investment in the State's less populated and rural areas ("nonentitlement" areas), which do not receive such funds directly from HUD.

The Indiana Office of Rural and Community Affairs (OCRA) receives and administers CDBG. The Indiana Housing & Community Development Authority (IHCDA) receives and administers HOME, ESG, HOPWA, and HTF. As a condition for receiving HUD block grant funding, the State must complete a five-year strategic plan called a Consolidated Plan for Housing and Community Development (Consolidated Plan). The Consolidated Plan identifies the State's housing and community development needs and specifies how block grant funds will be used to address the needs. Each year, the state completes an Annual Action Plan which determines how the funds will be spent in the coming program year (PY).

The 2020-2024 five-year Consolidated Plan was approved by HUD in July 2020. This document, the 2023 Annual Action Plan, is the fourth action plan in the 2020-2024 Five-year Consolidated Plan cycle. It describes how OCRA and IHCDA plan to allocate HUD block grant funds during the 2023 program year (PY2023), which runs from July 1, 2023 through June 30, 2024.

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

April 2024 CDBG amendment:

#### Sources of Funds:

FY 2023 CDBG Allocation	\$30,789,752
CDBG Program Income	<u>\$1,662,906.57</u>
<b>Total:</b>	<b>\$32,452,658.57</b>

#### Uses of Funds:

1. Owner Occupied Rehabilitation	\$ 3,000,000.00
2. Stellar Pathways Program	\$ 0.00
3. Blight Clearance Program	\$ 500,000.00
4. Main Street Revitalization Program	\$ 0.00

Annual Action Plan

5. Public Facilities Program	\$ 1,500,000.00
6. Wastewater Drinking Water	\$18,500,000.00
7. Stormwater Improvements Program	\$ 4,000,000.00
8. PreserVIing MainStreet	\$ 2,000,000.00
9. Needs Responsive Fund	\$ 0.00
10. Urgent Need Fund	\$ 0.00
11. Planning Fund	\$ 500,000.00
12. CDBG Program Income	\$1,662,906.57
13. Technical Assistance	\$ 200,000.00
14. Administration	\$ 589,752.00
<b>Total:</b>	<b>\$32,452,658.57</b>

During PY2023, the State of Indiana expects to be able to receive approximately \$59 million in housing and community development block grant funds.

- \$30,789,752 in the Community Development Block Grant (CDBG);
- \$16,429,054 in the HOME Investment Partnerships grant (HOME);
- \$3,967,121 in the Emergency Solutions Grant (ESG);
- \$2,160,235 in the Housing Opportunities for Persons with HIV/AIDS grant (HOPWA);
- \$5,391,554 for the National Housing Trust Fund (HTF).

Amended April 2024: CDBG will prioritize wastewater and drinking water and stormwater improvements (approximately 69%, up from 53% of CDBG funds) and public facilities (5%, down from 13%); Blight Clearance (2%, down from 10%); planning grants (5%); owner occupied rehabilitation (10%--same); PreserVIing Main Street (6%--same); and technical assistance and admin set-asides are 1% and 2% respectively.

HOME funds will prioritize rental construction projects (approximately 52% of HOME funds); innovative developments (15%); tenant based rental assistance (TBRA, 7%), and affordable homeownership development (11%). The remaining 15% goes to Administration (10%) and CHDO Operating (5%).

For ESG, IHCD plans to allocate funding to approximately 15-19 agencies to administer the ESG Rapid Rehousing and Homeless Prevention Components of the ESG program for line items: Housing Relocation & Services (financial and services), Rental assistance and administration. IHCD also allocates ESG funds to agencies to administer to emergency shelters and street outreach.

HOPWA will continue to assist persons with HIV and/or AIDS and who also have an income below 80% of AMI with housing placement and rental subsidies.

IHCD intends to allocate all of its HTF dollars for affordable rental housing, specifically for supportive housing for extremely low income households, (<30% AMI) which may include persons transitioning from homelessness and persons with disabilities. The HTF will also provide gap financing for Rental Housing Tax Credit developments.

### 3. Evaluation of past performance

OCRA remains committed to continuous improvement, and to ensuring that its CDBG programs consistently serve and prioritize the most current needs of rural areas. A recent study conducted by Ball State University and commissioned by the Office of Community and Rural Affairs in 2022 shows that many Hoosier counties are primed for success, and that how our agency develops plans to enhance that potential is critical.

Along with the BSU study, OCRA instituted a review of its entire CDBG grant program with the goal of reducing redundancies, and unnecessary burdens placed on communities. In 2021 and 2022, OCRA completed a series of in-person meetings (15 total) with local grant administrators to gather feedback on OCRA's current programs. During these meetings, OCRA received diverse input on evolving needs and opportunities in non-entitlement communities post pandemic, along with ways to improve its CDBG program delivery.

This review has already resulted in numerous improvements to the grant programs and process such as:

- Updating OCRA's current CDBG forms and resources to ensure alignment with all current federal and state requirements.
- Providing more guidance and instruction on the appropriate use and submission of all required forms to improve the timeliness and accuracy of form submissions by grantees.
- Making improvements to OCRA's electronic grants management system (eGMS) to better assess data and process applications;
- Utilizing new virtual meeting technologies to facilitate safe attendance at CDBG trainings and to promote the timelier delivery of technical assistance needed;
- Expanding training opportunities for program staff to serve as subject matter experts and;
- Reallocating funds to ensure obligation and expenditure rates.

As the needs of communities have continued to evolve post-pandemic, OCRA will subsequently make additional adjustments to its program allocations during FY 2023. These adjustments will include the reinstatement of formerly suspended programs (Stellar Pathways) and the addition of both pilot programs (Owner Occupied Rehabilitation and PreservINg Main Street) launched in 2021 to its regular menu of program offerings based on feedback from the selected pilot communities and various stakeholder organizations about how these programs could be adapted to meet the changing needs of the residents they serve.

*Please see the "Summary" section for the continuation of this response.*

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

**Public comment period.** A 45-day public comment period was held between February 15th, 2023 through March 31st, 2023. The draft plan was posted on both the OCRA and IHCD websites beginning on February 15th, 2023.

*Amendment: A 30-day public comment period was held between April 8, 2024 and May 8, 2024 to gather input on the proposed CDBG amendment.*

**Public hearings.** Two public hearings on the Draft 2023 Action Plan were held. The first hearing was held on February 9th at 5pm ET both online via Zoom and in person at Indiana Government Center South in Indianapolis. The second hearing was held on March 7th at 10am ET both online via Zoom and in person at Indiana Government Center South in Indianapolis. Notifications of the hearings were posted through RED notices, a statewide press release, through OCRA's Community Liaisons team, and via OCRA's social media pages. Notices reached more than 4,000 people.

*Amendment: A public hearing was held on April 15, 2024 to gather input on the proposed CDBG amendment.*

**Stakeholder focus groups.** Three virtual focus groups were conducted with those who work in rural and urban housing spheres in December of 2022. Participants included five Public Housing Authority leaders, one CDBG administrator, and two representatives of economic development corporations in rural areas.

**Stakeholder interviews.** Seventeen interviews were conducted with local government officials, organizational leaders, housing and social service providers, emergency shelter staff, and affordable housing developers. The Indiana Association of Regional Council (IARC) committee was also engaged during one of their regular meetings on February 9th via Zoom.

**Stakeholder survey.** A statewide survey of residents and stakeholders who work in the fields of housing, homelessness, and community development was conducted between February and March 2023. This survey collected data on current housing and community development needs in Indiana's non entitlement communities. It also asked stakeholders about the state's allocation of HUD block grant funds among activities and if changes are needed to better address current needs.

#### 5. Summary of public comments

Twelve public comment letters and/or emails were received during the public comment period. Public comments in their entirety are included in the Citizen Participation Attachment. A matrix of a summary of the comments and description of how the comments were considered in the 2023 Action Plan is available in the Citizen Participation Attachment. The comments and responses exceeded the 4,000 character limit.

Comment Summary	Response
<p>A request from one commenter to adopt a definition of affordable for the HOME program specifically and to provide the definition in the Action Plan. This commenter would also like to understand how rental projects are monitored for compliance and the AMI levels associated with extremely low, very low, low, and moderate income households.</p>	<p>Program definitions, AMI targeting, and program compliance monitoring are made available by IHEDA in their HOME Investment Partnerships Program Rental Construction Policy which can be accessed online at the following link:  <a href="https://www.in.gov/iheda/files/FY-2022-HOME-Rental-Program-FINAL-POLICY-v2.pdf">https://www.in.gov/iheda/files/FY-2022-HOME-Rental-Program-FINAL-POLICY-v2.pdf</a></p>
<p>Another comment was related to matching funds in affordable development. The commenter would like to ensure development partners have some skin in the game.</p>	<p>HOME rental projects require a 25% match. Match requirements for the HOME program are also outlined in the Investment Partnerships Program Rental Construction Policy which can be accessed online at the following link:  <a href="https://www.in.gov/iheda/files/FY-2022-HOME-Rental-Program-FINAL-POLICY-v2.pdf">https://www.in.gov/iheda/files/FY-2022-HOME-Rental-Program-FINAL-POLICY-v2.pdf</a></p>
<p>A commenter would like to see residents participating in the survey and the annual interviews.</p>	<p>Residents are typically consulted extensively during the 5-year Consolidated Planning process that informs the Annual Action Plan. Approximately 10% of respondents to the survey identified as residents this year. IHEDA and OCRA will consider expanding the annual survey to target residents specifically in future Action Plan years. It is also worth noting that two public hearings were held for the general public for the Action Plan.</p>
<p>One commenter would like to see an increased focus on homeownership programs using HOME and HTF funds in place of rentals. They present arguments that homebuyer housing requires less capital investment and allows owners to build equity. The same commenter would like IHEDA to reconsider the scoring by number of bedrooms because the average household size is 2.7 in Indiana.</p>	<p>IHEDA is allocating \$1.75 million in HOME funds to homeownership programs in 2023. IHEDA will consider the potential for expanded homeownership programs and the scoring criteria.</p>
<p>There is a desire for the HOME program to target the most vulnerable populations. The commenter wrote, "This can be accomplished by requiring at least 50% of the units be classified 30% AMI and 70% below 50% AMI."</p>	<p>Currently, the program encourages targeting very low and extremely low income households by offering points for committing to 20% of units being reserved for 30% AMI (5 pts) or 40% AMI (3 pts).</p>
<p>One comment was not in favor of funding the HOME Innovation Program.</p>	<p>IHEDA will continue to explore innovative programs with a healthy variety of target populations, in concert with the housing development goals set forth by the Governor and Lt. Governor.</p>
<p>Another comment suggests that measuring the number of households assisted or units created is not the same as measuring outcomes. This comment suggests that IHEDA reports on how much lives are improved. This</p>	<p>Measuring number of households assisted and units created or rehabilitated with funds are industry standard outcome measures and are required for reporting to HUD in IDIS. IHEDA will consider other outcome measures that further characterize the lived experience of residents.</p>



commenter would also like to see IHCD set production goals for the number of units built or rehabilitated.	
Another commenter would like to see scoring questions that are provided at the site visit when the Round opens to ensure that communities and grant administrators are able to complete their proposal using the questions for each Round.	OCRA's grant evaluation criteria, including project design scoring questions, are outlined in the application packet and available to communities ahead of each round opening. Project design points are awarded by the OCRA Scoring Committee when evaluating projects. Potential applicants are advised to refer to the application packet and scoring guide and to address all questions present. Applicants are also encouraged to work with their OCRA Community Liaison before submitting a proposal to identify ways to increase their project's competitiveness in these areas. Scoring questions are subsequently reviewed at the site visit by OCRA staff and proposal specific technical assistance is provided ahead of the final application due date.
One commenter wrote, "With \$25,659,761.93 in monies carried over from previous years, why are the expected expenditures not more?"	The Annual Action Plan is designed to allocate funds for the current program year among projects to fulfil goals outlined in the 5-year Consolidated Plan and Annual Action Plan. Funds from previous years are not captured in the plan, however, the \$25.7 million in HOME funds have been committed but not yet expended. Because of this, they show as remaining, but they cannot be included in the budget for this program year.
One comment indicates that the administrative requirements for the Owner Occupied Rehabilitation program are too onerous and the program is "too bureaucratic" to be effective.	OCRA has reinstated the OOR program because of the great need and public comments in favor of this program. OCRA is consistently working to improve administrative processes to improve program delivery.
Seven comments were received in favor of reinstating the OOR funds this program year. Additionally, the Inclusion Institute of The League submitted a policy brief signed by over 100 individuals in northeast Indiana in support of continued funding for OOR through 2024. Support was also shared by AARP Indiana and Prosperity Indiana in addition to The League.	N/A
One comment asked if there are remaining COVID funds from 2021 and 2022 that could be reallocated to OOR projects and two comments suggested that the current allocation should be increased to accommodate aging in place.	Remaining COVID-19 funding received through the CARES ACT (CDBG-CV) has been set aside for the nine communities participating in the Hoosier Enduring Legacy Program, also referred to as HELP. These funds will be used to support long-term pandemic recovery efforts and to ensure Indiana's rural communities are resilient in the face of future economic downturns or unprecedented health emergencies.
Another comment proposed a set aside from HOME or ESG to target very low and low income pregnant women and their children to address Indiana's high infant mortality rate in the amount of one million dollars.	IHCD will consider allocating funds in future program years to target single parent households. The requests among of \$1,000,000 of ESG funds for a single demographic group would not be feasible because it would be one-fourth of the overall ESG budget. This population is currently served by other funds

	such as Temporary Assistance for Needy Families (TANF) or the Indiana Pregnancy Promise Program at FSSA.
One commenter shared that there should not be two state agencies administering federal housing funds and that IHCD and OCRA need to improve marketing efforts to the general public.	The State receives block grants which are intended for explicitly different purposes. The two agencies have divided the funding sources and the development responsibilities accordingly. In most instances, the agencies distribute the funding to service and development organizations around the state who bear responsibility for marketing of the program availability.
Three comments noted infrastructure as a barrier to affordable housing, particularly in rural areas of the state. One of the commenters commends OCRA for continued funding of the WDW and SIP programs and requests OCRA continues to prioritize those programs along with public facilities and planning grants.	OCRA recognizes the need to support these programs through CDBG funds and has allocated 54% of CDBG funds in this program year to these programs.
One commenter applauded the planning grant program and requests that counties be permitted to partner with single rural utilities. Currently, it is, "impossible for non-municipal, non-profit regional water and regional wastewater utilities," to utilize this program	OCRA currently allows planning grant applicants, including counties, to contract with a not-for-profit organization (like a rural utility provider) to carry out the activities of an eligible project, provided that the organization can document its nonprofit status with the U.S. Internal Revenue Service, the Indiana Department of Revenue, and the Indiana Secretary of State.  Applicants are required to study all their water utilities as part of infrastructure planning funded with CDBG in order to encourage a more holistic community planning ethos and to ensure the effective utilization of CDBG funding available for this activity. This is in accordance with our agency's strategic plan which includes a goal to reward communities engaged in comprehensive planning and development efforts.
Several comments stated the application process, administration, and reporting make federal funds undesirable.	OCRA and IHCD strive to provide resources and processes that are easy to use and to implement when federal funds are received. Both agencies are continuously evaluating, improving, and ensuring compliance with program administrative requirements.
One comment suggested the programs are reevaluated every three years to, "ensure that they can be used in the current environment and that they are addressing today's issues not yesterdays."	Programs are currently reevaluated every five years for the development of the 5-year Consolidated Plan which includes a market and needs assessment as well as expanded resident and stakeholder engagement.
Another comment suggested an allocation for land banking to purchase and hold land for housing.	OCRA will consider the need for resources dedicated to land banking in future action plans.
One commenter expressed that only building housing in areas of opportunity limits the	IHCD will consider this comment in siting decisions and scoring criteria for future program years.

<p>accessibility that low income residents have to rural environments with a more relaxed atmosphere.</p>	
<p>Prosperity Indiana provided summarized public comments based on two online discussions with their members and written comments received from their members. Two global themes from these discussions included the need to focus resources and policies on housing Hoosiers with the greatest needs and, “concerns about staffing and capacity-building resources for community development organizations to allow them to serve the highest-need Hoosiers.”</p>	<p>IHCDA and OCRA will explore increasing administration funding for grant recipients.</p>
<p>Members of Prosperity Indiana also expressed a need for resources to rehabilitate both single family and multifamily properties beyond the OOR program and incentivize landlords to improve their rental units. Members also expressed a need to revisit the geographic distribution of funds and to address challenges with administration of funds to improve the delivery of affordable housing by increasing the capacity of organizations. Another commenter suggests the state look at capacity building as a workforce and pipeline challenge. Finally, Prosperity members and another commenter would like to see the distressed communities index to be graduated all the way up to stable. Currently there is a “cliff effect” where communities lose support after minimal improvements in stability.</p>	<p>IHCDA and OCRA will consider integrating these comments into future program years.</p>
<p>Two commenters suggested a portion of HOME funds be set aside for affordable housing preservation.</p>	<p>IHCDA values the preservation of affordable rental housing units. HOME Funds are regularly used to fill capital funding gaps in the Tax Credit program in which 10% of funding is set aside for Preservation of existing properties. In practice, the result is often a percentage larger than 10% being preserved.</p>
<p>Several commenters indicated there is a need to work with landlords on accepting residents with a housing voucher.</p>	<p>IHCDA's Housing Voucher team makes constant efforts in regard to enlisting new landlords, with positive results. The more landlords who understand the relative ease of being part of the program, the greater the number of available affordable rental units. As part of its 2023-2025 Strategic Plan, the Indiana Balance of State Continuum of Care has set a goal to work with other partners and stakeholders to increase affordable housing opportunities for people experiencing homelessness. To accomplish that goal, the IN BoS CoC will develop a</p>

	comprehensive and sustainable strategy to secure, maintain, and retain landlords willing to support people experiencing homelessness across Indiana. This work is to begin in Summer 2023.
--	--

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

All public comments were reviewed and considered in finalizing the Action Plan for submittal to HUD.

**7. Summary**

*Response continued from “Evaluation of Past Performance” above:*

Prior to the COVID-19 pandemic, OCRA also proposed revisions to its Grant Evaluation Criteria in order to promote meeting the national objectives of the CDBG program. These included revised community distress factors, program-specific points, and bonus points for regional collaboration, comprehensive planning, and a positive environmental impact. Due to the ongoing impacts of COVID-19, OCRA delayed the full implementation of these proposed Grant Evaluation Criteria until FY 2023.

Changes that will be implemented in 2023 Round 2 include:

- OCRA will adjust how National Objective Points are awarded to projects that aid in the elimination or prevention of slums and blight - Project sites must either be listed on the IFA Brownfields registry or must provide a letter from the IFA Brownfield program states the site is a brownfield.
- OCRA has partnered with Stats Indiana, an Indiana University entity to update the various factors utilized to determine the distress of a community. Revisions to the Community Distress Index include:

Replacing total housing vacancy rate with non-seasonal vacancy rates - Many rural communities have significant seasonal housing used for recreation/second homes or for seasonal workers. These units are considered vacant when calculating a total vacancy rate. The non-seasonal vacancy rate excludes these homes from the calculation.

Replacing median housing value with housing cost burden - The median housing value variable is strongly correlated with median household income, making it redundant in the previous distress score index. The housing cost burden variable—which here is defined as the share of renters and homeowners with a mortgage who spend more than 30% of household income on housing-- adds a new dimension to the index by including information on affordability.

Replacing labor force participation rate with population change - Some factors that are unrelated to distress can impact labor force participation. Population change shows the degree to which communities retain current residents and attract new ones.

- Program Specific Points will be adjusted for the Wastewater Drinking Water (WDW) & Stormwater Improvement Programs (SIP).

Financial Gap points will be adjusted to a maximum of 10 points per each \$1 in financial gap.

Green Infrastructure will be added and set at a maximum of 15 points for the inclusion of green infrastructure elements in the project.

For WDW, OCRA will begin adjusting its dated User Rate Benchmarks to address legislative taskforce recommendations and to better align with other common funding sources. OCRA will explore additional adjustments to these benchmarks in future funding years.

WDW - Combined utility rates for the ongoing operation and maintenance activities of the wastewater, drinking water, and/or stormwater systems.

- 0 points – Less than \$40 combined user rates
- 10 points – \$40-\$70 combined user rates
- 25 points – More than \$70 combined user rates

IHCDA values strong performance of organizations that receive these monies. To ensure this occurs, the agency monitors sub-recipients funding for compliance on an annual basis. These performance reviews are taken into consideration of future funding levels and opportunities. Moreover, IHCDA has mechanisms throughout the program year to track and review compliance for performance.

IHCDA efforts include:

- IHCDA has implemented a policy which expands the number of eligible project locations by allowing for non-profits certified as CHDOs to request funding for projects located in participating jurisdictions receiving less than \$500,000 of HOME funding within a Program Year. To increase the number of total applicants for the HOME program, IHCDA has developed scoring criteria for new HOME applicants to ensure diversity in applications. IHCDA is also tracking the number of rental units and homeownership units awarded each Program Year and those projects closed every year.
- IHCDA will continue to track the number of clarifications and technical errors issued to each partner during HOME application rounds in order to evaluate partner capacity and the clarity and ease of use of its own program policies.
- IHCDA will also continue to assess public comments on their respective policies and continue to make changes, when appropriate to the policies.

To end long-term homelessness, ESG funded organizations are required to work in coordination with Balance of State Continuum of Care (CoC) funded organizations to reduce the length of time people experiencing homelessness stay in shelters. This strategy manifests itself through the uses of IHCDAs Coordinated Entry and HMIS systems to ensure clients vulnerability is assessed and the correct program is applied to their needs. These programs are administered within the same IHCDAs division, Community Services, that partners with the CoC Balance of State Board of Directors.

In 2023, IHCDAs and the Indiana Balance of State Continuum of Care will engage a contractor to create a new Coordinated Entry System (CES) assessment process to produce more equitable outcomes and ensure households are served in a more trauma-informed manner, stably housed quickly, and matched with the appropriate housing placement. In addition, IHCDAs has also identified an additional contractor to provide an annual evaluation of the CES, which is required by HUD.

The Indiana Balance of State Continuum of Care Strategic Plan 2023-2025 has established an objective to provide guidance, training, and technical assistance to support Regional Planning Councils in order to strengthen internal operations to ensure organizations and people are supported within the homeless response system. Action steps towards fulfilling this objective will require a monitoring schedule of ESG projects to ensure that necessary information is included to meet HUD and CoC requirements and developing consistent metrics to evaluate active participation by HUD-funded programs in Coordinated Entry and Housing First implementation. This allows for continuity across programs policies and procedures, ensuring individuals are tracked throughout their experience in homelessness.

## PR-05 Lead & Responsible Agencies – 91.300(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	Christmas Hudgens	Office of Community and Rural Affairs
ESG, HOPWA Administrator	Kristin Svyantek Garvey	Indiana Housing and Community Development Authority
HOME, HTF Administrator	Peter Nelson	Indiana Housing and Community Development Authority

Table 1 – Responsible Agencies

### Narrative

Above are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

### Consolidated Plan Public Contact Information

Christmas Hudgens, CDBG Program Director  
OCRA  
One North Capitol Ave, Suite 600  
Indianapolis, IN 46204  
317.499.6563 | [ocra.IN.gov](http://ocra.IN.gov) | [chudgens@ocra.IN.gov](mailto:chudgens@ocra.IN.gov)

## **AP-10 Consultation – 91.110, 91.300(b); 91.315(l)**

### **1. Introduction**

This section describes the consultation efforts undertaken for the 2023 Action Plan.

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

During PY2022, the state continued its efforts to support the needs of businesses as they returned to pre-pandemic operations. IHEDA, OCRA, in partnership with the several other State Agencies under the Lt. Governor’s Family of Business, and in partnership with Ball State University and Purdue University released the Rural Road to Recovery Plan. This plan identified goals and priorities for both units of local government, social services agencies, and non-profits, to identify challenges caused by the COVID Pandemic, and outline a framework to aid in recovery of rural cities and towns throughout Indiana.

In August 2022, Lt. Governor’s Family of Business in partnership with Purdue University released the Rural Road to Recovery Impact Study. The study highlights the impacts of \$153 million of federal CARES Act funds and state emergency funds invested in rural communities in direct response to the health and economic crisis caused by the COVID-19 pandemic. The five agencies worked with every Indiana city and town in all 92 counties. This included direct assistance to at least 645 households and 3,158 businesses. The preliminary analysis of outcomes shows that the actions of the (5) five agencies made a difference in rural Indiana.

IHEDA will continue to coordinate with partners on recovery and identify how to streamline policies when appropriate and allowable, collaborate with health organizations and the development community to ensure the pipeline of safe and affordable housing across the housing spectrum, and work with non-profit partners on trainings, and will continue to work on identifying additional support for those non-profits so they can continue to serve their communities.

**Continued partnerships and involvement in state taskforces** with multiple state agencies and key stakeholders include:

- The “Housing as Medicine” taskforce that includes representatives from the state’s health department and Medicaid office.
- The “Social Determinants of Health” task force includes representatives from the state’s health department and Medicaid office. The group is currently reviewing and evaluating a spectrum of state programs and policies for alignment opportunities and to promote healthy outcomes.
- The “Recovery Housing” task force led by the Governor’s Office and the Family and Social Services Agency’s Division of Mental Health and Addiction and is reviewing best practices in



recovery housing models to identify gaps and potential legislative proposals needed to better fund and operate recovery housing in the state.

- IHCD has partnered with the State's Division of Mental Health and Addiction and the Family and Social Service Agency to provide capital HOME funding to support the construction of housing specifically for persons at risk of homelessness who have a Substance Use Disorder or Mental Health Disorder.
- In cooperation with FSSA Division of Aging, IHCD is studying the anticipated supply and demand of assisted living units and services across the state.
- IHCD also manages the CHDO Working Group – of which 8-10 Community Housing Development Organizations meet quarterly to discuss best practices in their implementation of HOME-funded affordable housing projects.
- The IHCD Community Services division has also entered into a partnership with the Indiana Department of Health on a Homeless Health Infectious Disease initiative, which will allow IHCD to hire three staff members who will be charged with working with congregate shelters to mitigate infectious diseases and ensure ongoing protocols.

*Please see the "Narrative" field for a continuation of this response.*

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

The IN-502 Continuum of Care (CoC) Board serves and acts as the oversight and planning body on preventing and ending homelessness for the CoC General Membership Body. The Board comprises a diverse set of geographically representative stakeholders with the knowledge and expertise to create policy priorities and make funding decisions related to homelessness. The CoC Board or the Executive Committee meets a minimum of 4 times per year. IN-502 covers every county in the state except Marion County (equivalent to the City of Indianapolis).

The CoC Board members represent populations in the homeless community, including subpopulations such as chronic homeless, seriously mentally ill, chronic substance abuse, families, domestic violence, youth and veterans as well as two representatives from the Regional Planning Councils on Homelessness. As the Collaborative Applicant and HMIS Lead for the BoS CoC board, IHCD, through the Community Services (CS) Division, oversees COC, ESG, and HOPWA funding sources. This structure allows for open communication and collaboration between CoC and ESG sub-recipients, which contributes to effective and equitable coordination of efforts to address the needs of homeless persons as well as continuity across funding sources and performance measures. Being located in Indianapolis also allows IHCD to meet and partner with the Indianapolis CoC for statewide communication and coordination.

The BoS CoC board has committees set up to help reach special populations experiencing homelessness as well as governance of the CoC and its funds and continues to work on its organizational effectiveness to address homelessness throughout the state. The BoS CoC has approved their 2023-2025 CoC Strategic Plan, which was informed by stakeholders who observed additional challenges due to the COVID-19 pandemic and are concerned about the reduction and expiration of resources provided through the CARES Act. As part of the Strategic Plan, the IN BoS CoC will work to advocate for more resources that support the homeless response system and to right-size and refine programs across the housing spectrum for people experiencing homelessness.

The State ESG program presents their program plans to the BoS CoC Board, in addition to entitlement cities at their meeting annually. Per the 2023-2025 CoC Strategic Plan, further collaboration will begin to build a more efficient and performance-based system to end homelessness. A related Action Item in the Strategic Plan aims to incorporate appropriate racial equity analysis to inform the Coordinated Entry system's assessment tool, process and prioritization scheme. Metrics for performance will be considered and as appropriate will become CoC policy.

**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**

In determining the ESG Allocation, a request for proposals is distributed to all the Regional Planning Councils on the Homeless throughout the Balance of State, current subrecipients of the ESG program, and current permanent supportive housing rental assistance programs who have had experience with rental assistance. The application is also available publicly on the IHEDA website and any new partners interested in the funds are sent a reminder once it is public.

Each proposal is reviewed by at least one IHEDA Community Services staff person. The reviewer completes a built in scoring tool in the application, assigning points based on the following program design components: outreach system, commitment to the coordinated access 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). Once applications have been scored they are presented to the IHEDA board for approval and the CoC Board as a courtesy.

The performance standards for ESG were developed in collaboration with the governing body for the Balance of State CoC Board through the Funding & Resource Committee and approved by the Balance of State CoC Board by using the national standards outlined in Section 427 of the McKinney-Vento Act, as amended by the HEARTH Act. These performance standards will be reviewed annually to reaffirm that performance standards continue to be in alignment. The 2023-2025 CoC Strategic Plan included an

Action Item to develop metrics for participation in HUD-funded programs in Coordinated Entry and Housing First.

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

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

1	<b>Agency/Group/Organization</b>	
	<b>Agency/Group/Organization Type</b>	
	<b>What section of the Plan was addressed by Consultation?</b>	
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	

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

None; all relevant organizations and agencies were invited to participate in the process. OCRA and IHCD utilized email notifications that reach more than 4,000 stakeholders and residents to encourage participation in the survey and public hearings.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	IHCDA	ESG goals are developed in collaboration with CoC planning through the inclusion of one board member that represents an ESG entitlement city collaborate interest
2020 Next Level Agenda	State of Indiana Governor's Office	CDBG goals and priorities support many aspects of the plan including supporting recovery from substance abuse addiction and enhancing educational attainment and broadband access.
OCRA Strategic Plan	OCRA	CDBG goals and priorities relate to rural challenges identified in the plan including the addiction crisis, affordable housing shortages, and aging water infrastructure.

Table 3 - Other local / regional / federal planning efforts

### Narrative

*Continued from above.*

IHCDA also offers training and webinars to partner organizations on topics ranging from program application requirements to funds management to weatherization courses. IHCDA maintains resources on its website with detailed manuals that instruct its partners on how to develop and administer programs.

IHCDA has also partnered with the State Department of Health on Lead based Paint through its Lead Hazard Reduction Demonstration Grant and the Health Homes Resource Program. Continuum of Care and ESG recipients are taking Lead Based Paint training to be able to better assist

clients with identifying health concerns in units older than 1978. In 2023, IHCD will provide training on Lead-Based Paint to all COC, ESG, and HOPWA recipients to insure they understand and adhere to all related policies and procedures.

IHCD has also established a strong relationship with the Family and Social Services Administration (FSSA) to coordinate affordable assisted living rental housing production and housing for persons with intellectual or developmental disabilities, or persons who have a chemical addiction.

IHCD has taken a leadership role among Indiana Public Housing Authorities to promote the development of Permanent Supportive Housing and increase utilization of the VASH program. IHCD has utilized its housing choice voucher program to provide rental assistance in PSH developments around the state. In the VASH program, IHCD has developed relationships with PHAs around the state to allow veterans to utilize the VASH program where they would like regardless of if the local PHA has a VASH program.

The Continuum of Care continues its work with entitlement cities that receive ESG funds to provide consultation and review project performance. The 2023-2025 CoC Strategic plan modified the terms of service of all board members. Board members (including the ESG representative) serve a 2-year term that can be renewed for another two years. Terms can be renewed three times. This is a collaboration between the Cities, State and the HUD CPD office to begin the process of utilizing funding with efficiency and to meet the most pressing needs statewide. IHCD will continue to sponsor a host of learning opportunities for ESG and HOPWA grantees on the topics of Fair Housing, Rapid ReHousing (RRH), Housing First and other case management trainings to support their work statewide.

Finally, IHCD staff members participate on a number of housing and community related boards and councils where key staff meet on a regular basis to train and partner. In 2022, IHCD entered into a formal partnership with the Indiana Department of Education to hire regional navigators who work with McKinney Vento Liaison Coordinators to create a bridge between community and school resources for youth and their families experiencing housing instability. IHCD regularly meets with the following housing and community related groups.

- National Association of Housing and Redevelopment Officials (NAHRO) Board,
- Youth Justice Oversight Committee,
- Indiana Mental Health and Addiction (IMHA) Planning and Advisory Council,
- Indiana Housing Trust Fund Advisory Committee,
- Family and Social Services Administration (FSSA) Division of Aging workgroup for the Indiana Master Plan on Aging,
- Back Home in Indiana Alliance,

- National Association of Homebuilders Housing Credit Professionals Board,
- Recovery Supports Workgroup (DMHA/FSSA),
- Indiana Pregnancy Promise Steering Committee (FSSA),
- Department of Workforce Development Work One centers,
- Indiana Commission on Higher Education outreach coordinators, and
- CoC network for the Balance of State and Marion County.

The list continues with many other city, county, and industry organizations.

**Low and Moderate Income resident consultation:** Consultation of LMI residents is largely conducted by interviewing service providers that work directly with these populations. During the development of the PY2023 Action Plan, stakeholders serving seniors, persons with HIV/AIDS, persons with disabilities, low-income households, residents vulnerable to housing discrimination, as well as local government and economic development interests participated in interviews and a survey to help identify priority needs. This year, nearly 50 residents responded to the Indiana Stakeholder and Resident Survey for the 2023 Action Plan. Notifications of the public hearings were posted through RED notices, a statewide press release, through OCRA’s Community Liaisons team, and via OCRA’s social media pages. Notices reached more than 4,000 people. Four people attended the first public hearing conducted for the Action Plan and 15 joined the second public hearing.

**Public Housing Authority consultation:** IHCD acts as the statewide housing authority for areas not otherwise covered in Indiana. IHCD administers the Section 8 housing voucher program for the balance of state. IHCD was an active participant in drafting the 2023 Action Plan through review, edits, input, and public hearings. In addition, a focus group with local public housing authorities was held in December 2022 to discuss the 2023 Annual Action Plan, PHAs were invited to complete the PY2023 Action Plan survey, and several participated in interviews.

## **AP-12 Participation - 91.115, 91.300(c)**

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

Stakeholder consultation and resident participation for the 2023 Action Plan included an online survey, available in February and March 2023; four virtual stakeholder focus groups, including public housing authorities, economic development professionals, and local governments; and interviews of housing providers, organizations that assist persons at-risk of and experiencing homelessness, advocacy organizations, units of local government, and community and economic development organizations and officials. Additionally, the Indiana Association of Regional Councils (IARC), a statewide association of regional planning organizations that promotes regional strategies and solutions to address local issues, was engaged through a presentation and facilitated discussion during their February regular meeting.

OCRA marketed the survey using the Community Liaison Team through their assigned districts. It was also posted on OCRA's website and social media pages and was discussed during relevant stakeholder meetings including meetings with the Indiana Association of Regional Councils (IARC), Accelerate Indiana Communities (AIM), American Council of Engineering Companies Indiana (ACEC), Indiana Main Streets, etc. The marketing of the survey is estimated to have reached more than 1,100 stakeholders.

IHCDA marketed the survey through the following listservs (with number of recipients in parentheses):

1. IHCDA Updates (13,216)
2. IHCDA Real Estate Department (RED) Updates (3,377)
3. IHCDA Continuum of Care List (2,600)
4. IHCDA Community Services Contacts (342)
5. Regional Planning Council Chairs (23)

A summary of citizen participation and stakeholder consultation appears in the table below.



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Online survey	Stakeholders and Residents	517 respondents	<p>See Grantee Unique Appendix for a complete summary.</p> <p>The survey captured residents' and stakeholders' perspectives on a variety of housing and community development needs and priorities, their experiences with State programs, and their suggestions for changes and improvements.</p>	All surveys were reviewed and accepted.	<a href="https://www.research.net/r/StakeholderSurvey23">https://www.research.net/r/StakeholderSurvey23</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Stakeholder discussions	Housing providers, organizations that assist persons at-risk of and experiencing homelessness, advocacy organizations, units of local government, and community and economic development organizations and officials.	17 completed	See Grantee Unique Appendix for a complete summary.  Stakeholders from throughout the state shared their perspectives on a variety of housing and community development needs and priorities, their experiences with State programs, and their suggestions for changes and improvements.	All input was considered in funding allocation and priority setting.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
3	Public hearings	Broad community	During the 1st public hearing on February 9th no participants joined in person and four participants joined online via Zoom. During the 2nd public hearing on March 7th at 10am, six participants joined in person at the Indiana Government Center and nine participants joined digitally via Zoom.	See Grantee Unique Appendix for a complete summary.  Comments during the public hearing largely focused on reinstating the OOR program, increasing capacity of rural areas, need for infrastructure to develop housing, and the need for integrated affordable housing.	All verbal and written comments were accepted and considered in finalizing the PY2023 Plan	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Virtual Focus Groups	Organizations that work in rural housing spheres	Participants included five Public Housing Authority leaders, one CDBG administrator, and two representatives of economic development corporations in rural areas.	<ul style="list-style-type: none"> <li>• Consistent funding to build and maintain affordable housing stock;</li> <li>• Development of housing for all income levels;</li> <li>• Increased rehabilitation funding for owner-occupied housing, public housing, and commercial spaces;</li> <li>• A targeted effort to attract and retain city staff;</li> <li>• More efficiency between private development and public management;</li> <li>• Ensuring low-income families can pay for and access internet.</li> </ul>	All input was considered in funding allocation and priority setting.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Facilitated Discussion	Indiana Association of Regional Councils (IARC)	IARC Board Members	<ul style="list-style-type: none"> <li>• Infrastructure is needed for housing development in rural areas.</li> <li>• Lack of supply and housing planning.</li> <li>• Issues with planning grant program being too prescriptive for utility plans.</li> <li>• Reporting required can become an administrative burden.</li> <li>• Maintain lists of eligible contractors to reach MBE/WBE goals.</li> <li>• All programs should require a grant administrator and participants are anticipating a new manual from OCRA.</li> </ul>	All input was considered in funding allocation and priority setting.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
6	Public Comment Period	Broad community	A 45-day public comment period is being held between February 15th, 2023 through March 31st, 2023. The draft plan was posted on both the OCRA and IHCD websites beginning on February 15th, 2023.	Twelve public comment letters and/or emails were received during the public comment period. Public comments in their entirety are included in the Citizen Participation Attachment.	All public comments were reviewed and considered in finalizing the Action Plan for submittal to HUD.	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.320(c)(1,2)

#### Introduction

This section specifies the expected amount of resources for the PY2023 Action Plan, based upon sources of funds.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG--Amended	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$30,789,752	\$1,662,906	0	\$32,452,659	\$30,789,752	\$18.5 million for Wastewater Drinking Program, \$1.5 million for Public Facilities, \$500,000 for Blight Clearance Programs, \$4 million for Stormwater Improvements, \$3 million for Owner Occupied Rehabilitation (OOR), \$2 million for PreservINg Main Street, \$500,000 for Planning Grants, \$200,000 for Technical Assistance, and \$589,752 for Admin Costs.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	16,429,054	6,849,314	25,659,761.93	48,938,129.93	16,429,054	\$8.5 million rental projects/ construction; \$1.75 homeownership projects/ construction; \$1.2 million Tenant Based Rental Assistance (TBRA) (if not utilized, will be converted to rental construction). (TBRA may be used in other Participating Jurisdictions.) \$850,000 for CHDO operating and predevelopment; \$1.63 million administrative uses; \$2.5 million for the HOME Innovation Round (TBA). If these funds are not utilized, they may convert to HOME rental construction and made available for rental, homebuyer or CHDO operating funds. Any Program Income collected in PY 2022-23 can be utilized in PY 2023.



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPW A	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	\$2,160,235	0	0	\$2,160,235	\$2,160,235	\$871,565 in TBRA \$435,782 for housing information activities \$373,528 short-term rental, utilities and mortgage assistance \$186,764 support facility operations and supportive services \$80,931 Permanent Housing Placement \$211,666 subrecipient and grantee administration

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	3,967,121	0	0	3,967,121	3,967,121	\$2.2 million emergency shelters with operations, essential services, and outreach \$1.5 million rental assistance for rapid re-housing \$251,084 for administration

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	\$5,391,554	0	0	\$5,391,554	\$5,391,554	IHCDA will allocate all of its HTF dollars for affordable rental housing, specifically for supportive housing for extremely low income households, (<30% AMI) which may include persons transitioning from homelessness and persons with disabilities. The HTF will also provide gap financing for Rental Housing Tax Credit developments.

**Table 5 - Expected Resources – Priority Table**

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

Anticipated matches for PY2023 include:

- \$4.35 million from required local government contributions on all CDBG projects,
- \$13 millions in n-kind services match for ESG shelter operations projects,
- \$1 million in in-kind services match for ESG RRH projects,
- \$1.5 million in cash matches from ESG subrecipients,
- \$22,000 cash match from subrecipients in assisting clients (in-kind),
- \$4.1 million from HOME recipients.

**OCRA match.** Matching funds include local public or private sector in-kind services, cash or debt allocated to the CDBG project. The level of local matching funds for CDBG projects is 10 or 20 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 current 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.

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

**HOPWA Leveraging.** HOPWA Project Sponsors are expected to provide leveraging totaling \$5,383,995. The primary sources of funding are from the Ryan White Grants and public funding from the Indiana State Department of Health and HIV Care Coordination.

**HOME match.** The HOME program requires a 25 percent match, which is the Federal requirement. Please note: Match requirements were suspended for PY 2020-2021. The Match requirement was reinstated in PY 2022. Applicants must demonstrate eligible matching funds equal to 25 percent of the amount of HOME funds requested. If the applicant is proposing to utilize banked match for the activity:

- 1) To use the applicant's own banked match, the match liability on the previous award during which the match was generated must already have been met and documented with IHCD for the match to be eligible as of the application due date. Only HOME-eligible match generated on IHCD awards made in 1999 or later are eligible to be banked.
- 2) To use another Recipient's match, the applicant must provide an executed agreement with the application verifying that the Recipient is willing to donate the match.

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

N/A; the State does not have publicly owned land or properties that will be used to address housing and community development needs during the five-year planning period. If publicly owned and donated land is used for match, that will be listed in the CAPER Match section.

**Prior year resources.** Prior Year funds will be used for eligible HOME projects, including rental construction projects, homebuyer construction, and the HOME Innovation projects. Prior Year Admin funds can be used for additional admin (up to the allowable cap, and for training contracts).

**Discussion**

*Please see above.*

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve Community Water, Wastewater and Stormwater	2020	2024	Non-Housing Community Development		Water, wastewater and storm water system	CDBG: \$18.5 million	Other: 28 Other
2	Support Community Revitalization	2020	2024	Non-Housing Community Development		Support of comprehensive community development	CDBG: \$4,500,000	Other: 1 Brownfield/Clearance projects, 3 Public Facility projects, 1 PreservINg MS Community projects
4	Provide Planning Grants to Local Governments	2020	2024	Non-Housing Community Development		Support of comprehensive community development	CDBG: \$500,000	Other: 10 Other
5	Owner preservation, aging in place, accessibility (and new affordable home purchases)	2020	2024	Affordable Housing Non-Homeless Special Needs		Housing for low and very low income persons Homeownership opportunities low income households	CDBG: \$3,000,000 HOME: \$1,750,000	Homeowner Housing Rehabilitated: 186 Household Housing Unit  HOME Homebuyer units

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Create and Preserve Affordable Rental Housing	2020	2024	Affordable Housing		Housing for low and very low income persons	HOME: \$8,500,000 HTF: \$5,391,554	Rental units constructed: 15 Household Housing Unit Rental units rehabilitated: 15 Household Housing Unit
7	Build Nonprofit Housing Developer Capacity	2020	2024	Affordable Housing		Support of comprehensive community development	HOME: \$850,000	Other: 10 Other (capacity building)
8	Rapid Re-Housing and TBRA to Prevent Homelessness	2020	2024	Homeless Non-Homeless Special Needs		Tenant based rental and rapid re-housing	HOME: \$1,200,000 ESG: \$1,500,000	Tenant-based rental assistance / Rapid Rehousing: 8000 Households Assisted
9	Provide Operating Support for Shelters	2020	2024	Homeless Non-Homeless Special Needs		Assistance to homeless shelters	ESG: \$2,200,000	Other: 50000 Other
10	Assist HIV/AIDS Residents Remain in Housing- STRMU	2020	2024	Non-Homeless Special Needs HIV/AIDS		Housing for low and very low income persons Tenant based rental and rapid re-housing	HOPWA: \$414,103	Housing for People with HIV/AIDS added: 1000 Household Housing Unit
11	Provide Housing Information and Placement Services	2020	2024	Non-Homeless Special Needs		Support of comprehensive community development	HOPWA: \$572,841	Other: 250 Other
12	Support Facilities Serving HIV/AIDS Residents	2020	2024	Non-Homeless Special Needs HIV/AIDS			HOPWA: \$207,051	Other: 250 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
13	Assist HIV/AIDS Residents Remain in Housing--TBRA	2020	2024	Non-Homeless Special Needs		Tenant based rental and rapid re-housing	HOPWA: \$966,239	Tenant-based rental assistance / Rapid Rehousing: 700 Households Assisted

Table 6 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Improve Community Water, Wastewater and Stormwater
	<b>Goal Description</b>	<p>OCRA will allocate \$18,500,000 of its FY 2023 CDBG funds for the Wastewater Drinking Water (WDW).</p> <p>Applications will be accepted in rounds, and awards will be made on a competitive basis. The specific threshold criteria and basis for scoring are provided in Attachment C and D hereto. WDW shall have a maximum grant amount based on present combined user rates (water, wastewater, and stormwater). The amount of CDBG funds granted will be limited to \$5,000 cost per project beneficiary. Matching funds of at least 20% of the total project cost are required for all this program.</p> <p>OCRA will allocate \$4,000,000 million of its FY 2023 CDBG funds for the Stormwater Improvements Program (SIP).</p> <p>Applications will be accepted in rounds, and awards will be made on a competitive basis. The specific threshold criteria and basis for scoring are provided in Attachment C and D hereto. The SIP shall have a maximum grant amount of \$600,000. The amount of CDBG funds granted will be limited to \$5,000 cost per project beneficiary. Matching funds of at least 10% of the total project cost are required for this program.</p>



2	<b>Goal Name</b>	Support Community Revitalization
---	------------------	----------------------------------

<p><b>Goal Description</b></p>	<p>OCRA will allocate \$500,000 of its FY 2023 CDBG funds for the Blight Clearance Program (BCP) 2.0 after evaluating demand during the 2023 program year.</p> <p>Applications will be accepted in rounds, and awards will be made on a competitive basis. OCRA will award grants to applications that meet the criteria outlined in Attachments C and D hereto. The BCP shall have a maximum grant amount of \$500,000. The amount of CDBG funds granted will be limited to \$5,000 cost per project beneficiary. Matching funds of at least 10% of the total project cost are required for this program.</p> <p>OCRA will allocate \$1,500,000 of its FY 2023 CDBG funds for the Public Facilities Program (PFP) 2.0.</p> <p>Applications will be accepted in rounds, and awards will be made on a competitive basis. The specific threshold criteria and basis for scoring are provided in Attachments C and D hereto. The PFP shall have a maximum grant amount of \$500,000. The amount of CDBG funds granted will be limited to \$5,000 cost per project beneficiary. Matching funds of at least 10% of the total project cost are required for this program.</p> <p>OCRA will allocate \$2,000,000 of its FY 2023 CDBG funds for PreservINg Main Street.</p> <p>PreservINg Main Street will assist one (1) Nationally Accredited Main Street (NAMS) or Indiana Accredited Main Street (IAMS) community with historic preservation and economic revitalization efforts over a two (2) year period.</p> <p>Applications from NAMS and IAMS communities with registered downtown historic districts will be accepted in a single round every other program year and awards will be made on a competitive basis. The selected community will be eligible for \$2,000,000 in set aside funds to implement downtown preservation projects based on a two-year preservation and revitalization strategy for their downtown historic district.</p> <p>The Main Street organization, along with the community foundation and LUG, will be responsible for raising a 10% match (\$200,000) for the project, which could include a mix of private and local funds. The total match must be raised before the end of the 2-year pilot.</p> <p>Of that 10%:</p> <ul style="list-style-type: none"> <li>• 50% will be put in a permanent endowment/revolving loan fund for downtown projects</li> <li>• 50% will be supplied to the Main Street organization for long-term sustainability.</li> </ul> <p>For example, this could be used for two years of funding a staff position and thus elevating an IAMS community to a NAMS within that two years</p>
--------------------------------	--

		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.
4	<b>Goal Name</b>	Provide Planning Grants to Local Governments
	<b>Goal Description</b>	<p>OCRA will allocate \$500,000 of its FY 2023 CDBG funds for planning-only activities.</p> <p>OCRA 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. OCRA will award such grants that meet the minimum scoring criteria outlined in Attachment D on a quarterly basis. The Planning Grant program shall have a maximum grant amount of \$90,000. The amount of CDBG funds granted will be limited to \$5,000 cost per project beneficiary. Matching funds of at least 10% of the total project cost are required for this program.</p> <p>A list of eligible plans and their specific maximum grant amounts are available on OCRA’s CDBG website. The Office reserves the right to prefer one type of plan over other types of plans when making awards.</p>
5	<b>Goal Name</b>	Owner preservation, aging in place, accessibility (and new affordable home purchases)
	<b>Goal Description</b>	<p>OCRA will allocate \$3,000,000 of its FY 2023 funds for Owner Occupied Rehabilitation (OOR). OCRA piloted an OOR program with a 2019 Stellar Finalist during the 2020 program year and extended that pilot to include (9) additional communities in the 2021 and 2022 program years. The purpose of the pilot is to determine OCRA’s capacity to offer an OOR program in the future.</p> <p>Applications will be accepted in rounds, and awards will be made on a competitive basis. The specific threshold criteria and basis for scoring are provided in Attachments C and D hereto. The OOR program shall have a maximum grant amount of \$250,000. Matching funds of at least 10% of the total project cost are required for all this program.</p> <p>The OOR program is funded by CDBG and administered by OCRA.</p> <p>HOME funds are used for homeownership construction and purchases administered by IHCD. \$1,750,000 of HOME will be allocated for homeownership projects including construction activities and purchases overseen by IHCD.</p>

6	<b>Goal Name</b>	Create and Preserve Affordable Rental Housing
	<b>Goal Description</b>	HOME and NHTF will be used to create and preserve affordable rental housing. HOME dollars will provide subsidies in the form of grants and loans to selected applicants for the acquisition, rehabilitation, and/or new construction of rental housing for low and very low-income households. \$8,500,000 (HOME) and \$5,391,554 (HTF) will be allocated to rental projects and new construction. \$2.5 million will be allocated to the HOME Innovation Round (TBA). If these funds are not utilized, they will convert to HOME rental construction.
7	<b>Goal Name</b>	Build Nonprofit Housing Developer Capacity
	<b>Goal Description</b>	This goal builds nonprofit capacity through pre-development funds and operating funds for CHDOs. CHDO pre-development funds are also available to eligible CHDOs on a rolling basis until funds are exhausted. CHDO operating fund dollars are also available to eligible CHDOs if they are funded for a CHDO Reserve project.
8	<b>Goal Name</b>	Rapid Re-Housing and TBRA to Prevent Homelessness
	<b>Goal Description</b>	The \$1.2 million of HOME funds allocated to TBRA will be converted to rental construction if not used. TBRA may be used in other participating jurisdictions.
9	<b>Goal Name</b>	Provide Operating Support for Shelters
	<b>Goal Description</b>	There will be approximately 60 agencies that will apply for the emergency shelter component that includes operations, essentials, and financial assistance and approximately 5-6 agencies that may apply for an outreach component. No more than the maximum allowed 60 percent of ESG funds will be allocated to operations, essentials, and street outreach. 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, nonprofits) who have had experience with rental assistance and will be published on the IHCD and Balance of State C of C website.

<b>10</b>	<b>Goal Name</b>	Assist HIV/AIDS Residents Remain in Housing- STRMU
	<b>Goal Description</b>	<p>Funds will be made available in the following percentages of the total awards made to project sponsors:</p> <ol style="list-style-type: none"> <li>1) At least 60 percent to direct housing assistance: long-term rental assistance, short-term rental assistance, and facility based operations;</li> <li>2) No more than 7 percent to subrecipient administration and 3 percent to grantee/recipient administration;</li> <li>3) No more than 35 percent to housing information and permanent housing placement activities; and</li> <li>4) No more than 35 percent to supportive services that positively affect recipients' housing stability.</li> </ol>
<b>11</b>	<b>Goal Name</b>	Provide Housing Information and Placement Services
	<b>Goal Description</b>	<p>Funds will be made available in the following percentages of the total awards made to project sponsors:</p> <ol style="list-style-type: none"> <li>1) At least 60 percent to direct housing assistance: long-term rental assistance, short-term rental assistance, and facility based operations;</li> <li>2) No more than 7 percent to subrecipient administration and 3 percent to grantee/recipient administration;</li> <li>3) No more than 35 percent to housing information and permanent housing placement activities; and</li> <li>4) No more than 35 percent to supportive services that positively affect recipients' housing stability.</li> </ol>
<b>12</b>	<b>Goal Name</b>	Support Facilities Serving HIV/AIDS Residents
	<b>Goal Description</b>	Care Coordination Sites for one-stop shopping for persons to access the level of care that is needed. Persons will be able to receive testing, diagnosis, medical information, supportive services, and housing as needed.

13	<b>Goal Name</b>	Assist HIV/AIDS Residents Remain in Housing--TBRA
	<b>Goal Description</b>	<p>Funds will be made available in the following percentages of the total awards made to project sponsors:</p> <ol style="list-style-type: none"> <li>1) At least 60 percent to direct housing assistance: long-term rental assistance, short-term rental assistance, and facility based operations;</li> <li>2) No more than 7 percent to subrecipient administration and 3 percent to grantee/recipient administration;</li> <li>3) No more than 35 percent to housing information and permanent housing placement activities; and</li> <li>4) No more than 35 percent to supportive services that positively affect recipients' housing stability.</li> </ol>

## AP-25 Allocation Priorities – 91.320(d)

### Introduction:

The State of Indiana does not prioritize the allocation of CDBG, HOME, or ESG geographically.

For CDBG awards, OCRA allocates funds to the areas of greatest need based on stakeholder and resident consultation and the needs assessment and market analysis. This information is used to guide the funding priorities for each program year.

Due to the COVID-19 pandemic, several OCRA programs including Stellar Regions, Owner-Occupied Rehabilitation (OOR), and the Main Street Revitalization Program (MSRP) were temporarily paused for FY 2020, FY 2021, and FY 2022. This pause gave the State the ability to reallocate CDBG funds to aid in the response to COVID-19 and to reassess the impact of these programs in accordance with Executive Order 20-05. The OOR Program and Stellar Program have been prioritized to receive funding in 2023 in response to public comments received in the 2022 and 2023 Action Plan consultations. . At this time, OCRA is working with OOR pilot communities to explore local community resource and training needs related to OOR in preparation to deploy funding allocated to the OOR program FY 2023.

Exact criteria vary by program, yet all programs prioritize assisting low-income households. Most of IHCD’s housing programs prioritize 50 percent AMI households; ESG and HOPWA generally reach to lower income levels due to the nature of the populations they serve.

### Funding Allocation Priorities

	Improve Community Water, Wastewater and Stormwater (%)	Support Community Revitalization (%)	Provide Planning Grants to Local Governments (%)	Owner preservation, aging in place, accessibility (%)	Create and Preserve Affordable Rental Housing (%)	Build Nonprofit Housing Developer Capacity (%)	Rapid Re-Housing and TBRA to Prevent Homelessness (%)	Provide Operating Support for Shelters (%)	Assist HIV/AIDS Residents Remain in Housing - STBMLI (%)	Provide Housing Information and Placement Services	Support Facilities Serving HIV/AIDS	Assist HIV/AIDS Residents Remain in	Total (%)
CDBG	70	15	5	10	0	0	0	0	0	0	0	0	100
HOME	0	0	0	12	73	6	9	0	0	0	0	0	100
HOPWA	0	0	0	0	0	0	0	0	24	25	9	42	100

ESG	0	0	0	0	0	0	40	60	0	0	0	0	<b>100</b>
HTF	0	0	0	0	100	0	0	0	0	0	0	0	<b>100</b>

**Table 7 – Funding Allocation Priorities**



## Reason for Allocation Priorities

ESG allocates emergency shelter and rapid re-housing, homeless prevention and outreach activities statewide.

The HOPWA grant does rely on a geographic allocation, determined through the Continuum of Care regions. Because IHCDCA allocates HOPWA to all ISDH-established care coordination regions except Region 7, it was determined that IHCDCA 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, IHCDCA will work with the regional sponsor to tailor services to meet the needs of the population.

IHCDCA will continue its competitive Rental Construction rounds, to be held 1-2 times a year (depending on the availability of funds). IHCDCA will allow for non-profit partners who are proposing HOME rental projects in PJs that receive less than \$500,000 to apply for IHCDCA HOME fund through the competitive stand-alone HOME round. IHCDCA will also allow for the use of HOME funding as supplemental gap financing for tax-credit projects.

IHCDCA will launch its third “HOME Innovation round” in 2023. IHCDCA is actively developing the policy for this activity in conjunction with a variety of state housing development priorities.

IHCDCA will hold \$1.75 million of HOME Funding for HOME Homebuyer Construction activities. The HOME Funds will help to cover gaps in development budgets and in homebuyer affordability.

The Indiana Supportive Housing Institute is an important element of the Indiana Permanent Supportive Housing Initiative (IPSHI), which was launched by IHCDCA and the Corporation for Supportive Housing (CSH) in 2008 to further the strategy to end long-term and recurring homelessness. The focus is on funding lasting solutions instead of stop-gap programs. The 2023 Institute aims to design supportive housing to those referred from the Coordinated Entry system. The Institute will help supportive housing partners learn how to navigate the complex process of developing housing with supportive services to prevent and end homelessness. Participation in the Institute is expected to reduce the time it takes to obtain funding for supportive housing by improving the planning and development process. Because of the critical needs within the target populations, this year’s Institute developments will be eligible for HOME Investment Partnerships Program American Rescue Plan (HOME-ARP) funds and National Housing Trust Fund (HTF) dollars for a total of up to \$5 million dollars per project. Consideration will only be given to responses proposing 100% permanent supportive housing developments.

The 2023 Institute will provide targeted training, technical assistance, and the opportunity to apply for predevelopment financing for both new and experienced development teams. Teams will receive over 80 hours of training including individualized technical assistance and resources to assist in completing their project. In addition, industry experts, including staff from IHCDCA, will provide insight on property management, financing, and building design.

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

IHCDA's method of distribution continues to target the various housing and homelessness priorities identified in the Consolidated Plan. IHCDA targets low- and very low-income persons through its HOME Rental Program and Tenant Based Rental Assistance (TBRA) Program; IHCDA will continue to target this population through the second HOME Innovation Round. The TBRA Program helps income-eligible households with rent, security deposits, and utility deposits, with specific attention towards low-income households with at least one member who is formerly incarcerated or who is exiting the corrections system without secure, stable housing. IHCDA also has higher subsidy limitations on HOME rental projects for units which target households at or below 50% AMI. IHCDA also awards competitive points through this policy for projects which have 20% of the units targeting 30% or 40% AMI households.

IHCDA will also continue to set aside funding for the HOME Homebuyer Program and will continue to provide technical assistance to those organizations interested in participating. IHCDA has continued to streamline the application process for those who wish to apply under this program. IHCDA will also continue to work with the State Habitat for Humanity Office to provide technical assistance on the program. IHCDA will continue working with the first HOME Innovation round cohort on their projects throughout PY 2023.

To meet the priority need of supporting comprehensive community development, IHCDA will maintain its training schedule and will work alongside OCRA on the relaunch of the Stellar Program. The Stellar Program has been re-evaluated and is set to relaunch in 2023.

In FY 2023, CDBG funds will be prioritized for basic health and safety improvements—specifically water and sewer infrastructure investments, public facilities, and clearance of blighted commercial and industrial sites—in rural areas that do not have the financial capacity or resources to make such critical improvements. Nearly half of the distribution of CDBG is typically allocated for these priority needs that help to address gaps in public infrastructure and services that arise as the needs of residents' change. The balance will address priority needs related to aging housing stock, economic growth and revitalization of rural communities with the goals identified in the Consolidated Plan through programs such as:

**Stellar Pathways** - The Stellar Pathways Program will be relaunched in FY 2023. Combining OCRA and IHCDA's experience with Stellar Communities, Regional Stellar, and the Hoosier Enduring Legacy, Stellar Pathways will elevate how regional planning occurs while partnering with universities and agency leadership in their community & economic development efforts. Stellar Pathways will guide regions to think innovatively and to take a holistic approach aligning identified needs and existing assets across four pathways. Regions will select projects within the Pathways following robust community outreach and engagement and through facilitated, pathway-specific focus groups. All finalists will develop Strategic Investment Plans that responds to the Region's identified needs.

Preserving Main Street – This is a multi-faceted community development program designed to build a sustainable historic preservation community ethic, build local capacity for local Main Street programs, and serve as a comprehensive downtown revitalization model. Lessons learned from both pilot communities will be incorporated into how available funding for this program is allocated.

Owner Occupied Rehabilitation (OOR) - OCRA recognizes that the effective management and administration of the (OOR) program is a significant effort at both the state and local level. As the needs of our rural communities continue to grow, the advantages of housing made available through the rehabilitation of existing homes seem evident based on public comment received. OCRA is also aware that numerous challenges exist which can impede the successful administration of this activity in accordance with all applicable federal requirements. For example, locally, there can be a great deal of variation from project to project and from community to community. Existing homes across the state differ in condition, age, etc. which can make the rehabilitation process far less predictable. Smaller rural communities with limited administrative capacity must often rely on regional partnerships, and/or other non-profits that act as sub-recipients for the OOR program because of the expense and complexity of the monitoring and oversight requirements. Challenges related to these requirements have become increasingly prevalent since the COVID-19 public health crisis and the resultant economic recession. The Office of Community and Rural Affairs (OCRA) recognizes the role of the OOR program in meeting the state's affordable housing needs and prioritized funding in FY 2023 to encourage greater use of the OOR program in rural communities to benefit aging and disabled residents.

The distribution of housing funds addresses the critical and growing need for affordable rental housing. IHEDA, as part of its HOME and HTF application review, assesses market need, developer financial capacity, the experience of the developer, and the financial capacity of the project through the period of affordability. IHEDA also scores applications on the past performance of the applicant, if the location of the proposed project is near areas of opportunity through its "Opportunity Index" (e.g., in counties with low unemployment), if the location of the project promotes positive health outcomes through its "Health Needs Index" (e.g., proximity to pharmacies and health care providers) and if the project will provide a high level of broadband access.

Additionally, in FY 2023, the ROZI state team will launch a self-guided course for rural communities interested in strategically identifying and securing investment opportunities for rural Opportunity Zones. Utilizing expertise acquired from past rounds, the course will assist communities in creating their own prospectus documents to spur such investment in qualified projects to drive growth.

## AP-30 Methods of Distribution – 91.320(d)&(k)

### Introduction:

This section summarizes the Methods of Distribution (MOD) for CDBG, HOME, HTF, ESG, and HOPWA for PY2023. Full MODs are appended to this Action Plan.

### Distribution Methods

**Table 8 - Distribution Methods by State Program**

<b>1</b>	<b>State Program Name:</b>	Emergency Solutions Grant (ESG)
	<b>Funding Sources:</b>	ESG
	<b>Describe the state program addressed by the Method of Distribution.</b>	<p>The ESG application and more information can be found at: <a href="https://www.in.gov/ihcda/program-partners/emergency-solutions-grant-esg/">https://www.in.gov/ihcda/program-partners/emergency-solutions-grant-esg/</a>.</p> <p>ESG uses different applications for each activity type (street outreach, shelter, rapid re-housing).</p> <p>Funding through the Emergency Solutions Program assists persons and families who are homeless find shelter, avoid homelessness and transition into permanent housing.</p>

<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>IHCDA plans to allocate funding to up to 15 agencies to administer the ESG Rapid Rehousing and Homeless Prevention Components of the ESG program for line items: Housing Relocation &amp; Services (financial and services), Rental assistance and administration.</p> <p>There will be approximately 60 agencies that will apply for emergency shelter component that includes operations, essentials, and financial assistance and approximately one-two agencies that may apply for an outreach component. No more than the maximum allowed 60 percent of ESG funds will be allocated to operations, essentials and street outreach. 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 will be published on the IHCDA and Balance of State CoC website.</p> <p>Each proposal will be reviewed by at least one IHCDA Community Services staff person. The reviewer will complete a built in scoring tool in the application, assigning points based on the following program design components: outreach system, commitment to the coordinated access 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 average of their proposal score and the amount of funding that will be available.</p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>N/A</p>

<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>IHCDA plans to allocate funding to approximately up to 15 agencies to administer the ESG Rapid Rehousing and Homeless Prevention Components of the ESG program for line items: Housing Relocation &amp; Services (financial and services), Rental assistance and administration.</p> <p>There will be approximately 60 agencies that will apply for emergency shelter component that includes operations, essentials, and financial assistance and approximately one-two agencies that may apply for an outreach component. No more than the maximum allowed 60 percent of ESG funds will be allocated to operations, essentials and street outreach. 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.</p> <p>Each proposal will be reviewed by at least one IHCDA Community Services staff person. . The reviewer will complete a built in scoring tool in the application, assigning points based on the following program design components: outreach system, commitment to the coordinated access 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 average of their proposal score and the amount of funding that will be available.</p>
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>N/A</p>

	<b>Describe how resources will be allocated among funding categories.</b>	No more than the maximum allowed of 60 percent of ESG funds will be allocated to operations and TBRA.
	<b>Describe threshold factors and grant size limits.</b>	The amount of each award could be between \$50,000 - \$350,000
	<b>What are the outcome measures expected as a result of the method of distribution?</b>	The goal of ESG is to prevent homelessness and assist families and individuals experiencing homelessness to find housing as quickly as possible. Please see the ESG MOD for the performance standards expected of ESG subrecipients.
2	<b>State Program Name:</b>	HOME
	<b>Funding Sources:</b>	HOME

<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>The HOME applications and information can be found at:  <a href="https://www.in.gov/ihcda/4084.htm">https://www.in.gov/ihcda/4084.htm</a></p> <p>Tenant based rental assistance programs funded with HOME have a separate application, found here:  <a href="https://www.in.gov/ihcda/4102.htm">https://www.in.gov/ihcda/4102.htm</a></p> <p>HOME Partnerships Investment Program is used to fund affordable rental unit construction and rehabilitation, develop affordable owner-occupied housing, assist special needs and homeless residents with housing needs (including through TBRA) and support the work of CHDOs.</p>
<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>Scoring appears in the HOME MODs for rental and homeownership programs. Those pairing HOME funding with the Indiana Permanent Supportive Housing Institute or the Rental Housing Tax Credit Program must also meet the requirements of those applications to be eligible.</p> <p>HOME rental applications are evaluated based on a policy that has undergone public comment. The criteria include: Project characteristics, Development Features, Project Readiness and Developer Capacity, Leveraging Other Sources, Unique Features and Bonus. The scoring also incorporates points for accessibility and visitability features in housing developments.</p> <p>HOME homebuyer applications are accepted on a rolling basis. If there are not sufficient eligible homebuyer applications, these funds may revert to the rental program. The scoring incorporates points for accessibility and visitability features, as well as units with 4+ bedrooms in housing developments.</p> <p>CHDO Pre-Development Funds are also available to eligible CHDOs on a rolling basis until funds are exhausted.</p> <p>CHDO Operating Funds are also available to eligible CHDOs if they are funded for a CHDO Reserve project.</p>



<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>N/A</p>
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>N/A</p>
<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>N/A</p>

<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>For the 2023 program year, the \$16,429,054 (2023 Allocation) expected HOME funding will be allocated among the following programs:</p> <ul style="list-style-type: none"> <li>\$8,500,00 rental construction projects</li> <li>\$1,750,000 homebuyer construction projects</li> <li>\$1,200,000 Tenant Based Rental Assistance (TBRA) (if not utilized, will be converted to rental construction). TBRA may be used in other Participating Jurisdictions</li> <li>\$850,000 CHDO Operating and CHDO Pre-Development loans</li> <li>\$1,630,000 administrative uses - \$600,000 organizational capacity, \$1,030,000 admin</li> <li>\$2.5 million for the HOME Innovation Program, Rental housing construction. If these funds are not utilized, they may convert to HOME rental construction.</li> </ul> <p>The balance of funds remaining and current year program income will be used for eligible activities which may include rental and homeownership construction, TBRA, and CHDO Operating funds.</p> <p>If IHEDA does not receive sufficient eligible homebuyer applications or TBRA applications, then these set-aside funds may revert to rental construction after two years.</p>
--	--

<p><b>Describe threshold factors and grant size limits.</b></p>	<p>The maximum request amount per application is \$1,000,000 for Rental (non-CHDO or CHDO in an eligible PJ); \$1,500,000 (CHDO); and \$500,000 for homebuyer projects.</p> <p>HOME funds used for acquisition, rehabilitation, new construction, soft costs, relocation, rent-up reserve, and developer fee combined cannot exceed the following amounts for units designated 50% AMI or higher on rental units :</p> <p>\$104,000 for a studio,  \$121,000 for a 1-bedroom unit,  \$139,000 for a 2-bedroom unit,  \$170,000 for a 3-bedroom unit; and  \$185,000 for a 4-bedroom+ unit;</p> <p>or the following for units designated 40% or lower:  \$130,000 for a studio,  \$152,000 for a 1-bedroom unit,  \$174,000 for a 2-bedroom unit,  \$210,000 for a 3-bedroom unit and  \$232,000 for a 4-bedroom+ unit</p> <p>The minimum amount of HOME funds to be used for rehabilitation or new construction is \$1,000 per unit.</p> <p>HOME funds cannot be used for reserve accounts for replacement or operating costs but may be used as a Rent-Up Reserve.</p> <p>Lead hazard and homebuyer counseling are limited to \$1,000 per homeowner or homebuyer.</p> <p>Tenant Based Rental Assistance will be made available to Partners through a Request for Qualifications.</p> <p>TBRA may pay for rent, security deposits and utility deposits. Eligible participants under this program are households in which at least one household member was formerly incarcerated and is experiencing housing instability. TBRA is available statewide. Information on the TBRA Administration Plan and the RFQ may be accessed here: <a href="https://www.in.gov/ihcda/4102.htm">https://www.in.gov/ihcda/4102.htm</a></p>
---	--

	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>Actual outcomes will depend on the types of applications received. All programs have the same goal of improving the quality of existing housing stock in Indiana. Metrics are typically expressed in number of households assisted or units created.</p>
<p><b>3</b></p>	<p><b>State Program Name:</b></p>	<p>Housing Opportunities for Persons with HIV/AIDS</p>
	<p><b>Funding Sources:</b></p>	<p>HOPWA</p>
	<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>The HOPWA award manual and request for qualifications for applicants can be found at: <a href="https://www.in.gov/ihcda/program-partners/housing-opportunities-for-persons-with-aids-hopwa/">https://www.in.gov/ihcda/program-partners/housing-opportunities-for-persons-with-aids-hopwa/</a> Housing Opportunities for Persons with HIV/AIDS assists persons with HIV and/or AIDS and who also have an income below 80% of AMI with housing placement and rental subsidies.</p>
	<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>IHCDA will facilitate a request for qualifications (RFQ), advertised through the CoC network and posted online, for HIV/AIDS service providers. The RFQ will gather information on the number of persons/households they plan to serve, housing plans, housing services, organizational capacity, performance goals, supportive services, and their proposed budget. The RFQ applicants need to meet the following thresholds:</p> <ul style="list-style-type: none"> <li>• Required to be a non-profit organization</li> <li>• Required to be or have a relationship with a current Indiana Department of State Health Care Coordination Site.</li> <li>• Previous experience providing HOPWA assistance.</li> </ul> <p>Actively attending the local Regional Planning Council/Committees/Leadership roles within their Region</p>

<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>N/A</p>
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>N/A</p>

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>IHCDA will facilitate a request for qualifications (RFQ), advertised through the CoC network and posted online, for HIV/AIDS service providers. The RFQ will gather information on the number of persons/households they plan to serve, housing plans, housing services, organizational capacity, performance goals, supportive services, and their proposed budget. The RFQ applicants need to meet the following thresholds:</p> <ul style="list-style-type: none"> <li>• Required to be a non-profit organization</li> <li>• Required to be or have a relationship with a current Indiana Department of State Health Care Coordination Site.</li> <li>• Previous experience providing HOPWA assistance.</li> </ul> <p>Actively attending the local Regional Planning Council/Committees/Leadership roles within their Region. By having all subrecipients to be or have a relationship with a current Indiana State Department of Health - Care Coordination Site, we are providing a one stop shop for persons to access level of care that is needed. Persons will be able to receive testing, diagnosis, medical information, supportive services and housing if needed.</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>Funds will be made available in the following percentages of the total awards made to project sponsors:</p> <ul style="list-style-type: none"> <li>• At least 60 percent to direct housing assistance: long-term rental assistance, short term rental assistance, and facility based operations;</li> <li>• No more than 7 percent to subrecipient administration and 3 percent to grantee/recipient administration;</li> <li>• No more than 35 percent to housing information and permanent housing placement activities;</li> <li>• No more than 35 percent to supportive services that positively affect recipients' housing stability.</li> </ul> <p>Once the Federal budget is determined, IHCDA will make adjustments proportionally to increase or decrease the above HOPWA allocation MOD.</p>

	<p><b>Describe threshold factors and grant size limits.</b></p>	<p>Because IHCDCA allocates HOPWA to all ISDH-established care coordination regions except Region 7 and parts of Region 11, it was determined that IHCDCA 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, IHCDCA will work with the regional subrecipient to tailor services to meet the needs of the population.</p>
	<p><b>What are the outcome measures expected as a result of the method of distribution?</b></p>	<p>For HOPWA, IHCDCA will use the following indicators to measure subrecipient's ability to achieve the desired outcomes:</p> <ul style="list-style-type: none"> <li>• Rental Assistance households/units</li> <li>• Short-term rent, mortgage and utility assistance households/units</li> <li>• Facility based housing operations support units</li> <li>• Housing information services households</li> <li>• Permanent housing placement services households</li> </ul> <p>Supportive services households</p>
<p>4</p>	<p><b>State Program Name:</b></p>	<p>National Housing Trust Fund</p>
	<p><b>Funding Sources:</b></p>	<p>HTF</p>
	<p><b>Describe the state program addressed by the Method of Distribution.</b></p>	<p>National Housing Trust Fund will be allocated in conjunction with HOME, HOME-ARP, and/or LIHTC funding to teams who complete the Indiana Supportive Housing Institute.</p>

<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>Applicants will be evaluated with the following criteria: 1) Eligible activities, 2) Needs of community, 3) Target populations to be served by the activities (&lt;30% AMI and experiencing homelessness), 4) Support geographic diversity and link to comprehensive revitalization of existing neighborhoods, 5) Organizational capacity, 6) Energy efficiency of project, and 7) Use of M/WBE contractors.</p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>N/A</p>
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>N/A</p>



<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>N/A</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>All funds will be allocated to support the rehabilitation or new construction of supportive housing in conjunction with RHTC or HOME developments undertaken by teams that have completed the Indiana Supportive Housing Institute.</p>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>The maximum request amount per application is \$1,000,000 for eligible rental projects. At IHCD's discretion, IHCD may allow recipients to apply for additional HTF funding or award additional HTF funding if the project demonstrates additional needs and meets all subsidy layering and underwriting guidelines.</p> <p>HTF funds used for acquisition, rehabilitation, and new construction combined cannot exceed the following per bedroom limits:</p> <ul style="list-style-type: none"> <li>Studio - \$139,750</li> <li>1-bedroom - \$163,400</li> <li>2-bedroom - \$187,050</li> <li>3-bedroom - \$225,750</li> <li>4-bedroom+ - \$249,400</li> </ul> <p>Minimum amount of HTF funds to be used for rehabilitation or new construction is \$1,000 per unit. All funds are provided as grants.</p>

	<b>What are the outcome measures expected as a result of the method of distribution?</b>	Number of units constructed, acquired, and/or rehabilitated for <30% AMI households and persons experiencing homelessness.
5	<b>State Program Name:</b>	State Allocation of CDBG
	<b>Funding Sources:</b>	CDBG
	<b>Describe the state program addressed by the Method of Distribution.</b>	<p>The CDBG MOD discusses the allocation of funds to subrecipients within the State programs of:</p> <ul style="list-style-type: none"> <li>• Stellar Pathways Program,</li> <li>• Blight Clearance Program 2.0 ,</li> <li>• Main Street Revitalization Program,</li> <li>• Public Facilities Program ,</li> <li>• Wastewater Drinking Program,</li> <li>• Stormwater Improvements Program,</li> <li>• PreservINg Main Street,</li> <li>• Owner Occupied Rehabilitation,</li> <li>• Needs Responsive Fund,</li> <li>• Urgent Need Fund,</li> <li>• Planning Grants,</li> <li>• Program Income,</li> <li>• Technical Assistance, and</li> <li>• Administration</li> </ul>

<p><b>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</b></p>	<p>Program criteria vary. In general, applications are accepted, and awards are made on a competitive basis throughout the program year. Criteria to select applications are located in attachments to the CDBG MOD.</p>
<p><b>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</b></p>	<p>Please see the MOD attached to this Action Plan.</p>
<p><b>Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)</b></p>	<p>N/A</p>

<p><b>Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)</b></p>	<p>N/A</p>
<p><b>Describe how resources will be allocated among funding categories.</b></p>	<p>For the 2023 program year, the \$32,452,658.57million is expected (including \$1,662,906 in program income). CDBG funding will be allocated among the following programs:</p> <ul style="list-style-type: none"> <li>• \$18.5 million for Wastewater Drinking Program,</li> <li>• \$1.5 million for Public Facilities,</li> <li>• \$500,000 for Blight Clearance Programs,</li> <li>• \$4 million for Stormwater Improvements,</li> <li>• \$3 million for Owner Occupied Rehabilitation (OOR)</li> <li>• \$2 million for PreservINg Main Street,</li> <li>• \$500,000 for Planning Grants,</li> <li>• \$200,000 for Technical Assistance, and</li> <li>• \$589,752 for Admin Costs.</li> </ul>
<p><b>Describe threshold factors and grant size limits.</b></p>	<p>Please see the program specific grant limits and factors located in the CDBG MOD.</p>

<b>What are the outcome measures expected as a result of the method of distribution?</b>	The expected outcomes vary by program; full details are contained in the CDBG MOD.
--	--

**Discussion:**

Please see above.

## AP-35 Projects – (Optional)

### Introduction:

For the 2023 program year, the State proposes to allocate funding to the following activities:

### CDBG funds:

- \$18.5 million for Wastewater Drinking Program,
- \$1.5 million for Public Facilities,
- \$500,000 for Blight Clearance Programs,
- \$4 million for Stormwater Improvements,
- \$3 million for Owner Occupied Rehabilitation (OOR)
- \$2 million for Preserving Main Street,
- \$500,000 million for Planning Grants,
- \$200,000 for Technical Assistance, and
- \$589,752 for Admin Costs

### HOME funds:

- \$8,500,000 rental projects/construction
- \$1,750,000 homeownership projects/construction
- \$1.2 million Tenant Based Rental Assistance (TBRA) (if not utilized, will be converted to rental construction). TBRA may be used in other Participating Jurisdictions.
- \$850,000 for CHDO operating and pre-development
- \$1.63 million administrative uses (\$1,030,000 internal and \$600,000 organizational capacity)
- \$2.5 million for the HOME Innovation Round, for Rental housing construction. If these funds are not utilized, they may convert to HOME rental construction.
- The balance of funds, and any Program Income collected during PY2023, may be made available for rental, homebuyer or CHDO

operating funds (up to the allowable cap). Any Program Income collected in PY 2022 can be utilized in PY 2023.

**ESG funds:**

- \$2.2 million emergency shelters with operations, essential services, and outreach
- \$1.5 million rental assistance for rapid re-housing
- \$251,084 for administration

**HOPWA funds:**

- \$966,239 in TBRA
- \$ 572,841for housing information and placement activities
- \$ 414,103 for short-term rental, utilities and mortgage assistance
- \$207,051 support facility operations and supportive services
- \$211,666 subrecipient and grantee administration

**HTF:** \$5,391,554 for acquisition, rehabilitation, and new construction of supportive housing to serve <30% AMI households and persons experiencing homelessness.

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

PY2023 allocations prioritize housing needs of the most under-resourced residents, including persons with disabilities, experiencing or at-risk of homelessness, with substance abuse disorders, and/or with mental illness challenges. These Indiana residents have been most impacted by the pandemic and rising housing costs. For CDBG, investments prioritize infrastructure improvements and economic revitalization to assist nonentitlement areas in their continued recovery from the pandemic and jump start private investment.

**AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)**

**Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?**

No

**Available Grant Amounts**

N/A

**Acceptance process of applications**

N/A



**AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)**

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

No

**State’s Process and Criteria for approving local government revitalization strategies**

N/A.

## **AP-50 Geographic Distribution – 91.320(f)**

### **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, OCRA and IHCDAs allocate funds to the areas of greatest need, based on stakeholder and resident consultation and the needs assessment and market analysis. This information is used to guide the funding priorities for each program year.

Exact criteria vary by program, yet all programs prioritize assisting low-income households. Most of IHCDAs's housing programs prioritize 50% AMI households; ESG and HOPWA generally reach to lower income levels due to the nature of the populations they serve.

For IHCDAs's HOME program, applications for rental and homeownership projects located within non-participating jurisdictions and those Participating Jurisdictions which receive less than \$500,000 of HOME funding directly from HUD will be considered for funding.

Several IHCDAs programs are available for projects statewide. This includes IHCDAs's HOME Tenant Based Rental Assistance Program, and projects selected through its Supportive Housing Institute, which utilize HOME and HTF. Evaluation of the HTF program applications includes a geographic diversity components and leverage of comprehensive community revitalization.

The HOPWA grant does rely on a geographic allocation, determined through the Continuum of Care regions because IHCDAs allocates HOPWA to all ISDH-established care coordination regions except Washington, Harrison, Floyd, and Clark counties. These four counties are served by Louisville/Jeffersonville, KY-IN MSA. In addition, Dearborn, Franklin, Ohio, and Union Counties are served by the Cincinnati, OH-KY-IN MSA. It was determined that IHCDAs 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), IHCDAs will work with the regional subrecipient to tailor services to meet the needs of the population. IHCDAs will be evaluating the HOPWA program in 2023 and soliciting feedback from service providers to ensure the allocation of funds meet the needs of eligible populations and modernization of the program.

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

The State agencies that receive funds determine geographic allocation based on grants that are awarded each year. Both OCRA and IHCDAs monitor geographic distribution of funds to ensure that application

criteria do not have the effect of disproportionately allocating funds into specific geographic areas.

**Discussion**

Please see above.

## Affordable Housing

### AP-55 Affordable Housing – 24 CFR 91.320(g)

**Introduction:**

This section lists the one year goals for numbers of households supported through HOME funding. These numbers are based on prior year accomplishments (reported in the CAPER) and projected project costs.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	20
Non-Homeless	255
Special-Needs	20
Total	295

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	75
The Production of New Units	200
Rehab of Existing Units	20
Acquisition of Existing Units	0
Total	295

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

**Discussion:**

The precise number of households to be supported through production of new units, rehab of existing units and acquisition of existing units is not yet known. It will be based upon the number of applications received.

## **AP-60 Public Housing - 24 CFR 91.320(j)**

### **Introduction:**

This section describes IHCD'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**

Since January of 2019, IHCD has approved eight Rental Assistance Demonstration projects, preserving 1,081 units across the State of Indiana.

Ten percent (10%) of available annual Rental Housing Tax Credits will be set aside for Developments involving the substantial rehabilitation of existing federally assisted affordable housing and/or the demolition and decentralization of federally assisted affordable housing units utilizing the same site (over 50% of the units must be replaced in the Development/Application).

This includes:

1. Developments that propose the preservation of HUD or USDA affordable housing; or RHTC Developments with Compliance Periods that have expired or are expiring in the current year and the extended use agreement is still in place; or
2. Federally assisted developments which entail demolition and decentralization of units with replacement of units on the same site as described above.

To be eligible for the set-aside, a Development must meet the following requirements:

- If a Development contains multiple building and construction types, at least 50% of the units must qualify as preservation units; and
- Rehabilitation hard costs must be in excess of \$30,000 per unit excluding the costs of furniture, construction of community buildings and common area amenities. However, USDA Rural Development Section 515 properties may include the cost of construction for community buildings and common area amenities in the minimum per unit amount. Note: for Developments competing in all other set-asides, rehabilitation hard costs must be in excess of \$20,000 per unit.

In addition, IHCD also offers points to Rental Housing Tax Credit Applications who propose the preservation of HUD or USDA affordable housing (including, but not limited to Project Based Section 8, Public Housing or RD 515 Properties).

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

**participate in homeownership**

N/A; the State does not own or operate public housing developments.

**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 – 91.320(h)**

### **Introduction**

For the 2023 Action Plan, the State considered feedback from service providers and shelters about the growing challenges of assisting residents experiencing homelessness. Stakeholders continued to express concerns about the limited housing and services to assist persons recovery from addiction, especially those leaving the criminal justice system. Housing with an integrated care model is imperative for these residents, and needed for persons with disabilities and seniors.

### **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 all HUD McKinney Vento Funded programs to utilize HMIS for all shelter or transitional housing or permanent supportive housing programs serving homeless individuals and families.
- Require all HUD McKinney Vento Funded programs to participate in the annual, statewide homeless Point-in-Time Count in late January and timely submission of this data to IHCD.
- Require all HUD McKinney Vento Funded programs subrecipients actively participate in their Regional Planning Council on the Homeless meetings regularly.
- Require all HUD McKinney Vento Funded programs to participate in the Coordinated Entry in their Region.

#### **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-25), emergency shelter and transitional housing needs are addressed through the ESG's participation in their local Regional Planning Council on Homeless in their Region but also through each Committee under the CoC Board. The Committees have been updated by the new CoC Board. They are: Executive Committee, Resources and Funding Committee, Strategic Planning Committee, Performance and Outcomes Committee and Ad Hoc Committees as needed. The State ESG program is part of the work of each committee in some way or another.

The 2023-2025 CoC Strategic Plan was informed by experience from the Board of Directors, stakeholders, and a planning session between the Board of Directors and IHCD. Important goals laid out were to increase affordable housing opportunities for people experiencing homelessness, advocate for resources to support the homeless response system, create a more equitable homeless response

system to support and elevate minoritized people, strengthen internal operations to ensure organizations and people are supported within the homeless response system, and right size and refine programs across the housing spectrum for people experiencing homelessness. These goals in coordination address the holistic needs for both the individual level and state level by incorporating personalized information into the homeless response system and advocating for increased affordable housing opportunities.

**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**

Rapid re-housing activities include housing relocation and stabilization services and financial assistance with rent, utilities, arrears, and deposits. The function of these funds is to provide short-term assistance to individuals and families. The State offers shelters a version of RRH that did not include rental assistance, and instead covers one time assistance to support a direct connection from shelter to permanent housing including housing relocation and stabilization services, utilities, arrears, and deposits.

Sub-recipients that receive RRH funds are required to create a Memorandum of Understanding (MOU) with shelters in their region to further strengthen the connection from emergency housing to permanent options including rentals with short/medium term subsidy.

A persistent barrier to the transition to permanent housing is lack of employment. This remains especially difficult in rural areas. Emergency shelters also reported that clients face challenges in moving from the shelter into permanent or transitional housing within the 40-day timeframe, which was the objective. Lack of affordable housing availability continues to be a key factor in extended lengths of stay in shelter while the housing search is in process.

IHCDA has contracted with a consultant to evaluate IHCDA's supportive housing initiatives, specifically whether supportive housing developments are meeting the goals of serving the most vulnerable households experiencing homelessness in their communities, providing appropriate supportive services for those households, and creating positive permanent housing outcomes for those households. The purpose of this study is to determine whether IHCDA's policies and training are effective in meeting these goals or if there are gaps that IHCDA can address with new or existing programs.

**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**

The Indiana Supportive Housing Institute is an important element of the Indiana Permanent Supportive Housing Initiative (IPSHI), which was launched by IHCD and the Corporation for Supportive Housing (CSH) in 2008 to further the strategy to end long-term and recurring homelessness. The focus is on funding lasting solutions instead of stop-gap programs. In 2022, the Permanent Supportive Housing Institute addressed issues of homelessness with a focus on serving people with high needs who are on the Coordinated Entry System. The 2023 Institute will continue to help supportive housing partners learn how to navigate the complex process of developing housing with supportive services to prevent and end homelessness. Participation in the Institute is expected to reduce the time it takes to obtain funding for supportive housing by improving the planning and development process. This year's Institute developments will be eligible for HOME funds HTF dollars for a total of up to \$1.75 million dollars per project, in addition to Low Income Housing Tax Credits.

The 2023 Institute will provide targeted training, technical assistance, and the opportunity to apply for predevelopment financing for both new and experienced development teams. Its focus will be to design supportive housing for those referred from the Coordinated Entry System, with the option to create 55+ age-restricted properties. Teams will receive individualized technical assistance and resources to assist in completing their project. In addition, industry experts, including staff from the Indiana Housing and Community Development Authority (IHCDA), will provide insight on property management, financing, and building design.

In 2022, IHCDA partnered with the Indiana Department of Education (DOE) to establish the Homeless Youth Regional Program, which establishes staff in both the Indianapolis and Balance of State CoC regions to understand current services for youth experiencing homelessness and creates opportunities for new resources. The Community Support Systems Navigators (CSSN) to improve access to resources for youth who are experiencing or on the verge of homelessness. CSSNs will work in their regions to understand current services for youth experiencing homelessness, create partnerships, and develop opportunities to link youth to those services/resources.

## **Discussion**

Please see above.

**AP-70 HOPWA Goals – 91.320(k)(4)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	225
Tenant-based rental assistance	125
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	25
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
<b>Total</b>	<b>375</b>

## AP-75 Barriers to affordable housing – 91.320(i)

### Introduction:

Barriers to addressing affordable housing needs that have been identified in the housing analysis from the Consolidated Plan and Analysis of Impediments to Fair Housing Choice (AI) include:

- Poor condition of affordable housing stock according to residents and stakeholders. Inability of residents to make needed improvements due to low incomes. Difficulty obtaining private sector loans to complete needed improvements due to low incomes of those living in units in poor condition.
- Disproportionately high levels of cost burden and lower levels of homeownership for minority populations other than Asian residents due to inadequate levels of publicly subsidized housing to meet their needs. Cost burden gaps are greatest for minority residents earning between 30 and 50 percent of the area median income—those just over the poverty level (lower middle class).
- High mortgage loan denial rates for non-White residents, even when adjusting for income level.

Minority residents and residents with disabilities are most likely to express challenges with home buying associated with saving enough for down payments and meeting mortgage loan qualifications.

- Higher use of publicly-supported housing by African American residents, suggesting challenges obtaining private market housing.
- Housing choice for residents with disabilities restricted by the lack of available, affordable, accessible housing. Nearly one-fourth of residents say the home they live in does not meet their family's disability needs and nearly two-thirds cannot afford to make improvements. The most needed improvement is ramps and handrails.
- Landlords not accepting service animals and charging higher rents or deposits for persons with disabilities requesting reasonable accommodations.
- Lack of rental housing for families with children: on average 72 percent of Housing Choice Voucher wait lists are families with children. PHAs surveyed for the AI consistently rated families with children as the demographic group with the most trouble finding rental housing—even more so than residents with criminal backgrounds.

### Economic Opportunity Issues

- Gaps in educational attainment for Hispanic residents.
- Residents with disabilities face challenges finding employment and those who are employed earn less than those without a disability.
- Economic differences contributing to segregation, mostly in urban areas. In some areas,

systemic steering, lack of opportunity and lack of available housing perpetuate racially homogenous neighborhoods.

- Limitations (property tax caps) on State and local tax revenue generation.
- Severe lack of services and trained staff to deliver mental health and supportive services.

The factors contributing to these issues are:

- Economic weaknesses in some nonentitlement areas preventing residents from making needed repairs.
- Lack of accessible housing stock.
- Historically lower incomes of non-White and Hispanic residents and, for Hispanic residents, lower rates of educational attainment.
- Residents with disabilities facing lower employment opportunities and discrimination in housing markets.
- Families with children and non-White and Hispanic residents experiencing discrimination in rental market transactions.
- Landlords not complying with and/or not understanding fair housing laws, particularly reasonable accommodations.
- Insufficient resources to fund ADA improvements to public buildings and infrastructure, particularly in rural areas.

The [IndianaHousingDashboard.com](https://www.indianahousingdashboard.com) is up and running, providing a wide range of data for community organizations and housing planners around the state. IHCD is already working to develop the second iteration of the dashboard which will provide additional sets of data with the granularity of census tracts, all with additional tools for market needs analysis and additional resources for funding and planning.

Also, in its 2023-2024 QAP, IHCD will require all developments in the housing tax credit program to create an Affirmative Fair Housing Marketing Plan (AFHMP) using HUD Form 935.2A. This requirement will affect nearly all rental developments assisted with HOME Funds and HTF.

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

Since the 2016 AI was developed, OCRA and IHCD have worked closely with the Fair Housing Center of Central Indiana (FHCCI) and the Indiana Civil Rights Division (ICRC) to address the identified barriers. In 2022, IHCD coordinated with FHCCI to provide a workshop for owners, developers, and property staff to better understand Fair Housing laws and compliance. These partnerships will continue during the

2023 Program Year and will focus on: Fair housing testing; Fair housing training and education and outreach; and inspecting and testing IHEDA funded properties for fair housing compliance.

Land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations and policies affecting the return on residential development and largely determined at the local level and are outside of the State's purview.

**Discussion:**

## **AP-85 Other Actions – 91.320(j)**

### **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 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.

As an example, the IHCD HOME Rental Policy contains an Opportunity Index scoring section. The purpose of this category is to incentivize developments in areas of opportunity. The Opportunity Index awards points for locating projects in areas close to public transportation and fresh produce as well as in areas with low unemployment rates, high job growth, and high median household incomes. Together, these categories enable IHCD to ensure projects are being funded in areas of opportunity and in areas where there is a high need for assistance.

In early 2023, IHCD is hosting a technical assistance webinar to answer general questions about HOME Rental Construction application forms for developers. The webinar also aims to educate applicants about IHCD's goal of funding housing for low-income people that are accessible, energy-efficient, and include MBE, WBE, Federal Disadvantaged Business Enterprise (DBE), VOSB, and/ or SDVOSB contractors and team members.

IHCD will also allow for CHDOs to apply for HOME funding if their project is located within a PJ who receives less than \$500,000 of HOME if the PJ also commits HOME funding to the project; this policy can assist with financing HOME projects which otherwise may have significant financial gaps in markets in which a larger LIHTC project may not be feasible, or in which there is not a market.

IHCD has also worked on providing and supporting capacity building of non-profits and CHDOs, offering a myriad of trainings including, but not limited to: National Development Council Rental Housing Development Certification, CHDO and Non-Profit Executive Course, HOME Fundamentals Training, Project Development Training, Green Building Certification, Lead and RRP Training and Certification, Aging in Place Certification, Universal Design Certification, Fair Housing Training, and training on Environmental Reviews and Section 106. Through this training, IHCD hopes to continue to provide quality training on how to use its federal funding and to ensure the highest quality of affordable housing.

In early 2023, IHCD's compliance team offered a free webinar training for owner and management agents that need to complete the 2022 Annual Owner Certification of Compliance. The training focused

on how payments can be completed in the IHCDAs online payment portal, adding units and utility allowances, recertification, and other related topics. In 2023, IHCDAs, in partnership with TDA consulting and HUD's CHDO Technical Assistance Provider, is providing a 17-week training series on Community Housing Development Organization (CHDO) regulations and non-profit management best practices. The training includes presentations and assignments for participants aimed to improve project management.

IHCDAs is maintaining its level of funding for Tenant Based Rental Assistance. IHCDAs has designed its TBRA program to improve the range of housing options for income qualified formerly incarcerated individuals. Under IHCDAs's TBRA Program, IHCDAs may provide security deposits, utility deposit assistance, or rental assistance. Waivers and extensions which were granted and subsequently extended by HUD in response to the COVID-19 pandemic expired on September 30, 2021. Therefore, all original program requirements have been reinstated.

A separate and distinct program offered by IHCDAs is the RampUp Program. RampUp provides grants to nonprofits to install exterior ramps to homes (up to \$5,000 per home) to improve accessibility for those Hoosiers with mobility and movement challenges. This program can assist any household with a member who is under six years of age, who is over 62 years of age, or who has a disability. Other limited repairs and modifications can be done to improve access, including the widening of doorways and the minimization of thresholds.

In 2023, IHCDAs and the Indiana Balance of State Continuum of Care will engage a contractor to create a new Coordinated Entry System (CES) assessment process to produce more equitable outcomes and ensure households are served in a more trauma-informed manner, stably housed quickly, and matched with the appropriate housing placement. In addition, IHCDAs has also identified an additional contractor to provide an annual evaluation of the CES, which is required by HUD.

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

The primary activities to foster and maintain affordable housing are the state's CDBG, HOME and HTF funded activities that include the production of new units, homeownership opportunities, home rehabilitation and capacity support for affordable housing developers. IHCDAs uses each of its programs to target a variety of needs and populations including, though not limited to: seniors, persons who are homeless, persons with physical or developmental disabilities, persons with mental impairments, persons with chemical addictions, single parents, victims of domestic violence, abused children families with children six and under veterans, and the re-entry population. IHCDAs has supported numerous trainings on different facets on developing and maintaining affordable housing, and supporting fair housing and access to safe, quality housing across the state.

IHCDAs's HOME program is focused on the following goals:

3. Demonstrate they are meeting the needs of their specific community;
4. Reach low and very low-income levels of income;

5. Link the project to the revitalization of existing neighborhoods, preferably through a comprehensive approach (i.e. as part of a published and approved community revitalization plan);
6. Advance projects that promote aging-in-place strategies for seniors, persons with disabilities, and families with seniors or persons with disabilities;
7. Propose projects that are energy-efficient and are of the highest quality attainable within a reasonable cost structure.

Applicants of IHCD'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
- Permanent Supportive Housing – Applicants must participate in the Indiana Supportive Housing Institute to be considered for an IHCD investment.
- Rental assistance
- Acquisition, rehabilitation, guarantees, refinance, or (re)construction of rental housing
- Homeownership counseling and down payment assistance (not available using HOME funding)
- Acquisition, rehabilitation, guarantees, refinance, or (re)construction of homebuyer 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.

IHCD has also updated its housing counseling requirements for its HOME Homebuyer applicants.

The HOME regulations at 92.254(a)(3) require all homebuyers who receive HOME assistance or purchase units developed with HOME funds must receive housing counseling. In a final rule published by HUD's Office of Housing Counseling, HUD established housing counseling certification requirements provided in connection with a HUD program. All adult household members who will hold title and be a party to the senior loan are required to complete homebuyer counseling.

Under the rule, all homebuyers assisted under the HOME program must receiving housing counseling that is performed by a certified housing counselor who has passed the HUD certification examination **and** is employed by a HUD-approved housing counseling agency.

The Housing Counseling must be independent, expert advice customized to the need of the consumer to address the consumer's housing barriers and to help achieve their housing goals and must, at a minimum include the following process:

- Intake
- Financial and housing affordability analysis
- An Action Plan
- Reasonable effort to have following up communication with the client when possible.



The content and process of housing counseling must meet the standards outlined in 24 CFR part 214. The counseling **must be individualized** to the specific potential homebuyer. The counseling must address all homeownership topics relevant to the client, including:

- The decision to purchase a home;
- The selection and purchase of a home;
- Issues arising during and affecting the period of ownership of a home (including refinancing, default, and foreclosure and other financial decisions);
- The sale or other disposition of a home.

In addition, the counselor must communicate on the importance of obtaining an independent home inspection using the materials available. All homebuyers must be given the two HUD brochures referenced below about the importance of home inspections. The recipient must ensure that each homebuyer signs a receipt acknowledging they were given these items. Both items may be accessed here: <https://www.hudexchange.info/resource/4747/for-your-protection-get-a-home-inspection/>

Eligible housing counseling is not services that provide only housing information, placement or referral services, routine administrative activities (such as intake), case management that provides housing series as incidental to a larger case management and does not fund housing counseling, fair housing advice and advocacy (such as filing claims), or group education without individualized services.

IHCDA will offer pre-purchase and post-purchase counseling as eligible under this policy. The delivery method may be flexible (in-person, by phone or via the internet), but the counseling must be specific to the homebuyer. The counselor at a minimum must provide eight hours of training; at least six hours must be pre-purchase. The certificate is valid for one year after completion of the training. The applicant, prior to entering into the sales contract, must submit documentation of the training to IHCDA for approval. If the pre-purchase training was not conducted or approved by IHCDA at time of the signed sales contract, the grantee will be required to repay HOME funds to IHCDA.

The recipient may not charge servicing, origination, processing, inspection, or other fees for the costs of providing homeownership program assistance.

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

### **Utilize the Healthy Homes Production Grant**

IHCDA received awards of \$2 million from the Healthy Homes Production Program and \$4.7 million from the Lead Hazard Reduction Program. Using these two awards, IHCDA has established the “Healthy Homes Resource Program” (HHP) to provide services and programs directly related to health hazards in the home. The program is offered by IHCDA statewide and provides repairs to both owner-occupied and rental housing for critical repairs to health hazards, including Lead Paint Hazard control, Radon Mitigation, Moisture Intrusion, Mold, Structural Issues and Accessibility Barriers. The program also includes cooperative efforts with the Indiana Community Action Agencies.

Healthy Homes Production Grant funding is exclusively for direct costs associated with the identification and remediation of housing related health and safety hazards using the Healthy Home Rating System (HHR). Those costs allowable with the Healthy Homes Supplemental funding include costs for the

assessment of housing units, for housing-related health and safety hazards, development of scopes of work for remediation of identified housing-related health hazards, conducting such remediation, re-evaluation of the completed work, reporting, notification to occupants and owners, if different, of the nature and results of the remediation.

The Healthy Homes inspection process is a risk-based assessment and will consider the effects on occupants' health. This assessment will be incorporated into the initial lead hazard risk assessment to minimize disruption to the occupants. The top six weatherization deferrals include mold, structural issues, roof leaking, standing water, access issues, and electrical.

From the list of 29 hazards in the Healthy Homes rating chart, IHEDA has determined the following hazards, in order of priority, to be addressed based on funding:

- Radon
- Moisture Intrusion
- Electrical Hazards
- Access issues
- Structural issues
- Lead Based Paint

Lead-based paint hazards will primarily be addressed through HOME funded rehabilitation activities. IHEDA has developed new lead program application forms and has provided multiple trainings on how to address lead-based paint through both of these programs in partnership with HUD. In late 2022, IHEDA released two Requests for Qualifications (RFQ) and three Requests for Proposals (RFP) to improve the health of area residents via housing interventions. Radon mitigation, lead abatement, home repair, and the inspection process are all priorities that IHEDA aims to address through the release of these RFQs and RFPs.

IHEDA will continue to offer workshops on the Lead Safe Housing Rule and the HUD Lead regulations to administrators and contractors. IHEDA will also be addressing the dearth of eligible risk assessors, inspectors and licensed contractors by working with the Indiana Builders Association to advertise trainings. IHEDA has also developed a program to allow for reimbursement for contractors to receive their appropriate lead licenses.

IHEDA keeps a database of lead-free housing for rental units which undergo lead hazard control through HHP.

As part of the Healthy Homes Resource Program, and in cooperation with the Department of Health, IHEDA keeps a website of all state-lead programming, a Lead Paint Safety guide, applications in both English and Spanish for interested families on this website:

<https://www.in.gov/iheda/homeowners-and-renters/lead-protection-program/>.

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

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.

The Governor's 2020 Next Level plan focuses on expanding educational and skill development opportunities in rural areas; attracting Defense Department-related jobs, and investing in broadband statewide.

In recent years, IHCD has made several program adjustments to more directly target funds to benefit poverty-level families. IHCD has added an Opportunity Index to incentivize the construction of HOME projects in areas with public transit, low unemployment, high job growth, proximity to employers, low poverty rate, and higher household income at the county and census tract level. IHCD also added a new scoring category on Health and Quality of Life Factors to incentive HOME developments near primary care physicians, fresh produce, and proximity to positive land uses.

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 OCRA or IHCD, 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/IHCD'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**

OCRA and IHCD will continue to build capacity, leadership, and institutional structure in rural areas through:

- Regional Capacity Building workshops;
- Webinars and regional meetings to discuss funding opportunities and answer questions from grantees;
- Participation in state conferences to market programs;
- The Indiana Permanent Supportive Housing Institute;
- CHDO working group – a group of eight to ten CHDO across the State of Indiana to discuss successes and challenges with the HOME Program, and to provide peer-to-peer support on non-profit capacity building.
- Trainings on Fair Housing and Reasonable Accommodations, Lead Based Paint, Certified Green Professional Certification, Certified Aging in Place Training and Universal Design; and
- Affordable housing development training.

IHCD continues to offer its trainings at no cost to partners and in an online format for those from

around the state who wish to participate without the burden of additional expenses related to travel.

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

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. 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. Prosperity Indiana provides policy coordination, as well as training and technical assistance, to support nonprofit housing and community development activities. The Back Home in Indiana Alliance is composed of Indiana leaders in several affordable-housing and disability-related organizations and help people with disabilities become homeowners in several Indiana communities.

Through provision of training and technical assistance (discussed above), OCRA and IHCD support coordination and help to build partnerships with and among these organizations. Examples from prior program years, which will be continued in PY2023, include:

IHCD's and OCRA's executive leadership and staff speak at public and private housing and community development events. IHCD staff have spoken at a variety of conferences for Accelerate Indiana Municipalities (AIM); the Indiana Association of Regional Councils (IARC); Indiana Housing Conference; and the Indiana Township Trustees Association. OCRA regularly presents and attends conferences hosted by AIM, Association of Indiana Counties (AIC), and IARC as well.

OCRA holds regular "listening sessions" in non-entitlement areas throughout the state to gather information on economic development and housing challenges. Those sessions provide an opportunity for various housing, service, and community development interests to explore solutions to their needs and foster working relationships.

OCRA's community liaisons (OCRA's can be found at <https://www.in.gov/ocra/2330.htm>) partner with local units of government, the private sector, and nonprofits to locate and proactively work to locate funding and other resources for community and economic development projects, as well as facilitate the meeting of local officials, state, and federal agencies. They also provide technical assistance on all OCRA programs.

IHCD's two Real Estate Production Analysts each cover a region of the state (North and South) and provide frequent outreach and technical assistance. Outreach is provided by email, over the phone, and in-person when requested. Production Analysts also traditionally attend ribbon cutting,

groundbreakings, and other promotional events.

IHCDA conducts regional outreach meetings every year. These meetings are held three to five times a year and are each located in a different area of the state in order to ensure that partners in all areas of the state are able to easily attend. The information provided at these meetings is also tailored to address the specific needs of the region in which the meetings is being held. Local projects are highlighted as well. Production Analysts and other IHCDA staff utilize their existing contacts to invite current and potential partners to these meetings. Outreach meetings provide an opportunity for partners to meet their analysts as well as ask questions and provide input on IHCDA policy. Due to COVID precautions, these meetings have been held virtually and can continue to be conducted as webinars if necessary.

IHCDA also sponsors, in partnership with the Indiana Affordable Housing Council, the Indiana Housing Conference. The Indiana Housing Conference is an annual conference for affordable housing professionals in which industry news and best practices are discussed. The conference also provides an opportunity for networking between affordable housing professionals from across the state and country.

In 2022, the Permanent Supportive Housing Institute addressed issues of homelessness with a focus on serving people with high needs who are on the Coordinated Entry System. The 2023 Institute will continue to help supportive housing partners learn how to navigate the complex process of developing housing with supportive services to prevent and end homelessness. Participation in the Institute is expected to reduce the time it takes to obtain funding for supportive housing by improving the planning and development process. This year's Institute developments will be eligible for HOME Investment Partnerships Program American Rescue Plan (HOME-ARP) funds and National Housing Trust Fund (HTF) dollars for a total of up to \$5 million dollars per project. Consideration will only be given to responses proposing 100% permanent supportive housing developments.

The 2023 Institute will provide targeted training, technical assistance, and the opportunity to apply for predevelopment financing for both new and experienced development teams. Its focus will be to design supportive housing for those referred from the Coordinated Entry System. Teams will receive individualized technical assistance and resources to assist in completing their project. In addition, industry experts, including staff from the Indiana Housing and Community Development Authority (IHCDA), will provide insight on property management, financing, and building design.

IHCDA and OCRA will also partner on the re-launch of Stellar and will work with DMHA to target housing for persons with SUDs and mental health disorders.

IHCDA has also continued to partner with the Indiana Department of Health on its Healthy Homes Resource Program. IHCDA has started the Indiana Healthy Homes Roundtable which meets monthly to

discuss lead-based paint issues throughout the state. The group consists of IHCD and ISDH.

IHCD has also established a strong relationship with the Family and Social Services Administration (FSSA) to assess affordable assisted living supply, along with production of housing for persons with intellectual or developmental disabilities, or persons who have a chemical addiction.

Finally, when funding rounds are open, OCRA and IHCD both hold webinars and regional visits were held to educate potential grantees about the application process.

**Discussion:**

Please see above and refer to the uploaded Appendix for the continuation of responses that exceeded the character limit in this section.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

#### Introduction:

This section outlines the program specific requirements for all funding sources.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.320(k)(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	\$1,662,906.57
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>\$1,662,906.57</b>

#### 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.	80.00%

#### HOME Investment Partnership Program (HOME) Reference 24 CFR 91.320(k)(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:

The recipient must implement recapture restrictions for any homebuyer property purchased, in whole or in part, by a homebuyer that received a direct buyer subsidy from the recipient in an amount greater than or equal to One Thousand and 01/100 Dollars (\$1,000.01) from 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). Developers, other than CHDOs, are not allowed to provide down-payment or closing cost assistance.; However, a developer may provide a direct subsidy by reducing the purchase price from fair market value to an affordable price.

There are two different consequences that may be associated with a recapture provision: (1) the recapture provision can be triggered (as described just below) or (2) an event of non-compliance can occur (as described further below). The recapture provisions are triggered if any of the following occur during the Affordability Period:

1. The homebuyer transfers or conveys the property by deed, land contract, or otherwise;
2. Foreclosure proceedings are commenced against the property;
3. The property is transferred by an instrument in lieu of foreclosure; or,
4. The title to the property is transferred from the homebuyer through any other involuntary means.

The amount of the homebuyer subsidy shall be reduced by multiplying the homebuyer subsidy by the Forgiven Ratio (defined below) in order to determine the amount that will be forgiven. The amount to be recaptured and shall be limited to the Net Proceeds of the sale. Net Proceeds is defined as the sales price minus superior loan repayment (other than HOME funds) and closing costs. If there are no Net Proceeds, the amount to be recaptured will be zero and the HOME loan is considered satisfied. In the event there is significant market appreciation, once the HOME obligation is recaptured, the homebuyer can retain any appreciation. The amount recaptured cannot exceed the Net Proceeds, if any. Forgiven Ratio means a ratio that calculates the amount of the Direct Subsidy that is forgiven. This ratio shall be calculated by dividing the number of full months that owner occupies the property as its principal residence by the total of number of months in the Affordability Period.

The recipient will be required to ensure that a lien and restrictive covenant agreement , drafted by



IHCDA has been executed and recorded on any HOME-assisted property.

In accordance with CPD Notice 12-003, the recipient must also execute a HOME written agreement with the homebuyer before or at the time of sale. The purpose of the agreement is to ensure that all parties are aware of the provisions related to the lien and restrictive covenant agreement and HOME requirements applicable to the HOME assisted unit (i.e., period or affordability, principal residency requirement, etc.). The recipient will be required to use IHCDA's form of Homebuyer Recapture Agreement.

If there is both a development subsidy and a direct homebuyer subsidy or just a direct homebuyer subsidy, a recapture provision must be implemented. In cases where a direct homebuyer subsidy was not provided and there is only a development subsidy, resale restrictions must be executed on the property. Under recapture guidelines the Affordability Period is based upon the total amount of the direct homebuyer subsidy that the homebuyer received in HOME funds. A direct 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).

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 Grantee Unique Appendices for the guidelines (HOME Homebuyer policy on pages 31-32). IHCDA does use the home affordable homeownership limits published by HUD.

Recipients will be required to provide an "after rehab" or "construction value" appraisal; whichever is appropriate, from a licensed appraiser for all property assisted with the award with the first draw that includes hard costs. If the applicant is acquiring property, an "as-is" appraisal is required with the first draw request for acquisition reimbursement.

According to 24 CFR 92.254(a)(2) in the case of acquisition of newly constructed housing or standard housing, the property must have a purchase price that does not exceed the Homeownership Values as determined by HUD. For newly constructed housing, the value limits are 95% of the median purchase price for the area based on the Federal Housing Administration (FHA) single family mortgage program data for newly constructed housing. HUD has established a minimum limit, or floor, based on the 95% of the U.S. median purchase price for new construction.

For existing housing, the value limits are 95% of the median purchase price for the area based on Federal FHA single family mortgage program data for existing housing and other appropriate data that is available. HUD has established a minimum limit, or floor based on 95% of the state-wide nonmetropolitan area median purchase price for existing housing.

The limits can be accessed from HUD here: <https://www.hudexchange.info/resource/2312/home-maximum-purchase-price-after-rehab-value/>

It is important to note that while these are the maximum limits, the amount may not be affordable to a potential HOME-buyer. IHCDA, through its underwriting as defined in the earlier section, may

deny the final sales contract if the purchase price (the mortgaged amount), even reduced, is determined to be higher than the homebuyer may safely afford. The HOME-assisted housing unit must be occupied as the homebuyer's principal residence throughout the affordability period.

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:

N/A

### **Emergency Solutions Grant (ESG) Reference 91.320(k)(3)**

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

Please see the Grantee Unique Appendices for the guidelines.

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

The Coordinated Assessment Committee of the Balance of State Continuum of Care Board 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. IHEDA is the collaborative applicant within the CoC and IHEDA was awarded the Coordinated Access Grant. With the assistance of the CoC Board, IHEDA has developed and continues to improve upon the coordinated access system.

**Access:** The Coordinated Assessment will be in the HMIS system and utilized by the Coordinated Access agency within the Region within the Balance of State CoC whether they are an ESG subrecipient or other programs funded by McKinney Vento. Each Region will determine if their Coordinated Access will be a centralized or decentralized system.

**Assessment:** Each homeless person will be assessed and triaged based on their needs in order to prioritize the most vulnerable and those with the highest barriers for first assistance. This priority would include the chronic homeless population.

**Assign:** Once assessed the person/family then will be assigned to the right type of housing that best suits their needs whether it is permanent supportive housing, rapid rehousing or VASH voucher and whether it is available in that area or Region.

3. 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 up to 15 agencies to administer the ESG Rapid Rehousing and Homeless Prevention Activities of the ESG program for line items such as: housing relocation and services (financial and services), rental assistance and administration.

There will be approximately 60 agencies that will apply for emergency shelter component that includes operations, essentials, and financial assistance and approximately two - six agencies that may apply for the Annual Action Plan street outreach activity. No more than 60% of ESG funds will be allocated to operations, essentials and street outreach. A request for proposals will be distributed to all the Regional Planning Councils on the Homeless throughout the Balance of 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. Each proposal will be reviewed by at least one IHCDA Community Services staff person and by a member of a Committee under the CoC Board. Each reviewer will complete a scoring tool, assigning points based on the following program design components: outreach system, commitment to the coordinated access 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 average of their proposal score and the amount of funding that will be available. The amount of each award could be between \$60,000 and \$250,000 each.

4. 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.

The State ESG recipient- IHCDA - has a member the Balance of State CoC Board who has been formerly homeless and currently lives in a permanent home after recently leaving permanent supportive housing. As a member of the committee Board of Directors, this representative considers all committee provides guidance to our CoC Programs and their policies and procedures and is currently participating in the CoC's Strategic Planning Process. The State of Indiana recognizes the invaluable perspective of individuals who are currently homeless and formerly homeless in developing an effective person-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 subrecipients to demonstrate how participation and input of people experiencing homelessness is utilized at both an organizational level and within their regional Planning Councils on Homelessness. This will be a threshold item and will require the subrecipient to provide documentation around their policies for verification. This issue is also reviewed during program

monitoring visits.

5. Describe performance standards for evaluating ESG.

The performance standards were developed in collaboration with the governing body for the Balance of State CoC Board and the Resource & Funding Committee and approved by the Balance of State CoC Board 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 ESG CAPER reports for the current grant prior year. Two of the standards are specific to the subrecipients program performance and the remaining two are specific to system outcomes.

ESG subrecipients will be able to set their own goals for the next years on areas such as: discharging persons to permanent housing, increasing employment income and increasing overall income by persons who exit the emergency housing.

Below are goals that IHCDCA would like to reach on an annual basis:

ESG RR -rental assistance program subrecipients: At discharge from program, 82 percent of persons assisted will still be permanently housed, and 65 percent will increase their income.

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

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

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

The average length of stay of participants in ESG funded and other CoC programs should decrease by at least 10 percent.

**Housing Trust Fund (HTF)**  
**Reference 24 CFR 91.320(k)(5)**

1. How will the grantee distribute its HTF funds? Select all that apply:

b Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Eligible applicants include CHDOs, non- and for-profit affordable housing developers, and joint venture partnerships. Awards will be allocated based on the following criteria:

1. Whether the development demonstrates a need for HTF in order to make a greater number of units affordable to extremely low and very low households;
2. Whether the development meets State and Federal requirements of all programs for which the applicant is applying, including the threshold requirements;
3. Successful completion of the Permanent Supportive Housing Institute;
4. If the development ranking is sufficient for it to be awarded RHTC pursuant to the RHTC process as outlined in the current QAP; and,
5. The availability of HTF funds.

b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Application requirements are described in detail in Part I of the 2021 HTF Draft Policy which is part of Appendix A (Methods of Distribution) in the Grantee Unique Appendices. Appendix A MOD also includes HOME Rental Application Policy, HOME Homebuyer Policy, and HOME Innovation Round RFP, and Institute RFP.

Eligibility will be determined based on:

1. Whether the development demonstrates a need for HTF in order to make a greater number of units affordable to extremely low and very low households;
2. Whether the development meets State and Federal requirements of all programs for which the applicant is applying, including the threshold requirements;
3. Successful completion of the Permanent Supportive Housing Institute;

4. If the development ranking is sufficient for it to be awarded RHTC pursuant to the RHTC process as outlined in the current QAP; and,
5. The availability of HTF funds.

c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Selection criteria are described in detail in Part I of the HTF Draft Policy which is part of Appendix A (Methods of Distribution) in the Grantee Unique Appendices. Applicants will be evaluated with the following criteria: 1) Eligible activities, 2) Needs of community, 3) Target populations to be served by the activities (<30% AMI and experiencing homelessness), 4) Support geographic diversity and link to comprehensive revitalization of existing neighborhoods, 5) Organizational capacity, 6) Energy efficiency of project, 7) Use of M/WBE contractors.

d. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Eligible developments can be located in any city, town or county located in Indiana. There is no geographic preference for the use of the HTF.

e. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Timely Undertaking- moderate priority: As stated under the Threshold Items Section 6.3 (d) of the HTF Policy, the applicant is required to demonstrate their ability to undertake the activities set forth in its application upon receipt of the HTF award, to begin construction within 12 months of receipt of the award, and to complete the development within a 24 month period.

6.3(d): The applicant must demonstrate experience and capacity to conduct an eligible HTF activity as evidenced by its ability to:

Own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development; or

Design, construct, or rehabilitate, and market affordable housing for homeownership.

Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-

income families. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Project-Based Rental Assistance- high priority: As stated under Threshold Items Section 6.3(c) and 6.3 (e), in order to be eligible for the permanent supportive housing set-aside of the QAP and for HTF funding, the applicant must demonstrate how units will be made affordable to the targeted population of persons experiencing homelessness. All developments are required to identify a source of project-based rental assistance for the supportive housing units, generally through Project-Based Section 8 vouchers or CoC funding. Developments that have not identified an operating subsidy source do not meet threshold and will not be considered for funding. As stated under Section 7.1 Rents Charged, Applicants may be eligible for 16 points for rent targeting.

6.3(c): The Applicant must identify all subsidy sources. Funding commitments must be provided with the RHTC application. If the funding has not yet been committed, application must provide proof of application, a narrative describing the selection process, and a narrative plan on how the development will move forward if the application is denied. HTF cannot be committed until all other sources have been committed.

6.3 (e): The Development must serve populations that are extremely low income and experiencing homelessness. The target population served by the development must be the target population that was identified based on community need and relevant data through the Supportive Housing Institute process and align with the goals of the Consolidated Plan.

g. Describe the grantee’s required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Affordability Period- low priority: As stated under the Threshold Criteria Section 6.3 (a), applicants must meet the minimum 30-year period of affordability to be eligible for funding.

h. Describe the grantee’s required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter “N/A”.

Priority Housing Needs of Indiana- high priority: Through the 2020-2024 Consolidated Plan, the State of Indiana includes extremely low-income households and permanent supportive housing/integrated supporting housing as housing priority needs.

To be eligible for the supportive housing set-aside in the QAP and for HTF, the applicant must further

the creation of community-based housing that targets the extremely low income (less than 30% AMI) with intensive service programs that have a direct impact on reducing homelessness through the Housing First model, to meet the State's priority housing needs of serving extremely low income households. Applicants who have not successfully completed the Supportive Housing Institute and/or who do not meet the set-aside criteria as identified in both the QAP and in Sections 2.1 and 6.3 (e) of this Allocation Plan will not be eligible for funding.

In addition, IHCD may award additional scoring of 93 points under Sections 7.1 Rents Charged; 7.2 Development Characteristics; and 7.3 Sustainable Development to prioritize projects which best serve.

i. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Extent of Non-Federal Funding- moderate priority: As stated under the Threshold Items Section 6.3 (c), the applicant must demonstrate all subsidy sources. IHCD may also award up to 11 points for projects that meet the criteria as outlined in Sections 7.2 (l) Tax Credit Per Unit; 7.2 (m) Tax Credit per Bedroom; 7.4 (a) Leveraging Capital Resources; and 7.4 (c) Previous Funding in a Local Government.

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes

**6. Performance Goals and Benchmarks.** The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes



### **7. Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.**

Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

See Part 4.1 Subsidy and Budget Limitations of the HTF Policy (pp. 16-17) for the per unit subsidy limits. A description of how the limits were determined by be found in the same section.

**8. Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

All HTF funded projects must meet the property standards outlined in 93.301. The rehabilitation standards are set in a separate appendix.

- Developments must use Uniform Physical Condition Standards (UPCS). A listing of those standards can be found in the Multi-Family Checklist. Beyond the UPCS standards, projects must also comply with IHEDA Rehabilitation Standards (see Exhibit A); and the stricter of the local rehabilitation standards or the Indiana State Building Code.
- The development must meet the accessibility requirements at 24 CFR Part I, which implements Section 504 of the Rehabilitation Act of 1973.

- Covered multi-family units, as defined at 24 CFR 100.201, must meet the design and construction requirements at 24 CFR 100.205, which implements the Federal Fair Housing Act Amendments of 1988.
- Any units utilizing gas appliances must provide carbon monoxide detectors in addition to standard smoke detectors.
- Newly constructed units must meet additional energy efficiency standards for new construction pursuant to section 109 of the Cranston-Gonzalez National Affordable Housing Act.
- Where relevant, the housing must be constructed to mitigate the impacts of potential disaster, in accordance with State and local codes, ordinances, or other State and local requirements, or such other requirements as HUD may establish.

**9. Resale or Recapture Guidelines.** Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter “N/A”.

N/A

**10. HTF Affordable Homeownership Limits.** If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter “N/A”.

N/A

**11. Grantee Limited Beneficiaries or Preferences.** Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A.”

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303(d)(3) only if such limitation or preference is described in the action plan.

The purpose of this Housing Trust Fund (HTF) application is to provide subsidies in the form of grants to selected applicants for the acquisition, rehabilitation and/or new construction of supportive housing for persons with extremely low income (at or below 30% of area median income) and experiencing

homelessness. For this funding cycle, HTF funds will be offered exclusively to Rental Housing Tax Credit developments that (1) apply for funding under the Qualified Allocation Plan (QAP) for the Rental Housing Tax Credit Program (RHTC) and (2) successfully completed the Indiana Supportive Housing Institute and/or HOME Rental Applications.

Eligible applicants for tax credits and HTF funds must have successfully fulfilled all requirements and demonstrated meaningful and successful participation in the Indiana Supportive Housing Institute for the specific development for which they are applying. The Indiana Supportive Housing Institute provides training and support to organizations that plan to create supportive housing. Tenant outreach, selection, property management and service plans must be approved as part of the Institute process and prior to submission of a RHTC application. Participation in the Institute is based on a competitive RFP selection process.

**12. Refinancing of Existing Debt.** Enter or attach the grantee’s refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter “N/A.”

N/A; refinancing of existing permanent debt is not eligible under IHCD's HTF program.

**Discussion:**

For HOPWA: IHCD will facilitate a request for qualifications (RFQ), advertised through the CoC network, posted online, and provided to current HIV/AIDS service providers. The RFQ is available to all agencies who meet the threshold requirements. Many of the programs that apply through the RFQ started off as grassroots agencies years ago by starting a non-profit program based upon the growing HIV/AIDS epidemic and the need in their community. There was a growing need of resources that were not readily available for this population. The non-profits utilized their partners in the community to build their board membership and collaborated with local hospitals, clinics, and housing agencies to assist in providing education, testing, supportive services, financial assistance, and housing. Nonprofit community organizations that apply are usually mental health centers, HIV/AIDS programs specifically, or local hospital.

The RFQ will gather information on the number of persons/households they plan to serve, housing plans, housing services, organizational capacity, performance goals, supportive services, and their proposed budget. The RFQ applicants need to meet the following thresholds:

- Required to be a non-profit organization

- Required to be or have a relationship with a current Indiana Department of State Health Care Coordination Site.
- Previous experience providing HOPWA assistance.
- Actively attending the local Regional Planning Council/Committees/Leadership roles within their Region.
- No current outstanding findings with HUD or IHADA.

By having the threshold that all applicants must be or have a relationship with a current Indiana State Department of Health Care Coordination Site, we are providing a one stop shop for persons to access level of care that is needed. Persons will be able to receive testing, diagnosis, medical information, supportive services and housing if needed. Care Coordination is a specialized form of HIV case management. Its mission is to assist those living with HIV disease with the coordination of a wide variety of health and social services. Case Management services are available statewide. It provides an individualized plan of care that includes medical, psychosocial, financial, and other supportive services as needed. It is offered free of charge to the person. The primary goals of the program are to ensure the continuity of care, to promote self-sufficiency, and to enhance the quality of life for individuals living with HIV. The trained professionals provide assistance such as: access to health insurance, housing programs, emergency funds, medications, utility assistance, mental health and substance abuse programs, and HIV testing and prevention programs.

The RFQ will be evaluated through a tool that will verify that each applicant meets the threshold requirements and have financial capacity by meeting accounting and financial standards. It will be verified that each subrecipient are certified to be a care coordination site by requiring they attach the certificate or agreement showing they meet the standard.

## APPENDIX.

---

### PUBLIC NOTICE AND COMMENTS

## **Notice of Adjusted Public Comment Period for the 2024 Annual Action Plan for Housing and Community Development**

Notice is hereby given that The Indiana Office of Community and Rural Affairs (OCRA) and the Indiana Housing and Community Development Authority (IHCDA) have identified the need to adjust the public comment period for the 2024 Annual Action Plan as HUD is still computing grantees' allocation amounts for the programs covered by the Consolidated Plan.

OCRA and IHCDA will have the 2024 Action Plan available for public inspection prior to its submission.

Members of the public are invited to review the 2024 Action Plan during the hours of 8:30 a.m. to 5 p.m. ET, April 8 through May 8, 2024, at the Indiana Office of Community and Rural Affairs, located at One North Capitol, Suite 600, Indianapolis, Indiana 46204. The Action Plan will also be available online at: [in.gov/ocra/cdbg/consolidated-and-action-plans/](https://in.gov/ocra/cdbg/consolidated-and-action-plans/) or [in.gov/ihcda/newsroom/action-plans/](https://in.gov/ihcda/newsroom/action-plans/).

Information regarding the 2024 Action Plan can be obtained by writing to: Office of Community and Rural Affairs, c/o 2024 Action Plan, One North Capitol, Suite 600, Indianapolis, Indiana 46204-2027. Additional information may also be obtained via e-mail at [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) or [SEnz@ihcda.IN.gov](mailto:SEnz@ihcda.IN.gov) or [CHudgens@ocra.IN.gov](mailto:CHudgens@ocra.IN.gov).

Participants are welcome to join the 2<sup>nd</sup> public hearing to provide comment on the 2024 Action Plan online only or in person at the hybrid meeting locations. Please email [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) or call 970-880-1415 for the Zoom meeting link or call-in number to attend the public hearing virtually. You can access the virtual public hearing by phone or computer.

### **Public Hearing: Monday, April 15, at 4 p.m. ET**

In person at 1 N Capitol Avenue, Indianapolis, 46204 in the First Floor Conference Room.

Online (email [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) or call 970-880-1415 for the Zoom link)

Additional locations will be added and made available soon on OCRA's website.

OCRA and IHCDA still anticipated submission of the 2024 Annual Action Plan to HUD on or about May 15, 2024.

## **Notice of Filing of 2023 Annual Action Plan for Housing and Community Development- Amendment One**

Notice is hereby given that the Indiana Office of Community and Rural Affairs (OCRA) plans to amend the 2023 Annual Action Plan for Housing and Community Development ("2023 Action Plan") with the U.S. Department of Housing & Urban Development on or about May 15, 2024. This amendment will make adjustments specific to the Owner-Occupied Rehabilitation Program (OOR) and to OCRA's existing program income policy.

The Annual Action Plan concerns programs funded through the U.S. Department of Housing & Urban Development under Title I of the Housing & Community Development Act of 1974 as

amended. Annually, the state receives about \$65 million for housing and community development funds. This document governs the allocation of those funds among housing and community development activities (e.g., economic development initiatives, infrastructure improvements, and homeownership and rental programs).

The 2023 Action Plan provides information on the housing and community development needs priorities and one-year spending plan for the Community Development Block Grant Program (CDBG), the Home Investment Partnership Program, the National Housing Trust Fund, the Emergency Solutions Grant Program and the Housing Opportunities for Persons With AIDS Program.

OCRA will have the 2023 Action Plan amendment available for public inspection prior to its submission.

Members of the public are invited to review the 2023 Action Plan during the hours of 8:30 a.m. to 5 p.m. ET, April 8<sup>th</sup>, 2024 through May 8<sup>th</sup>, 2024, at the Indiana Office of Community and Rural Affairs, located at One North Capitol, Suite 600, Indianapolis, Indiana 46204. The 2023 Action Plan amendment will be available online at: [in.gov/ocra/cdbg/consolidated-and-action-plans/](https://www.in.gov/ocra/cdbg/consolidated-and-action-plans/).

Information regarding the 2023 Action Plan Amendment can be obtained by writing to: Office of Community and Rural Affairs, c/o 2023 Action Plan Amendment, One North Capitol, Suite 600, Indianapolis, Indiana 46204-2027. Additional information may also be obtained via e-mail at [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) or [CHudgens@ocra.IN.gov](mailto:CHudgens@ocra.IN.gov).

A public hearing will be held in a hybrid setting to discuss the methods of engagement and provide comments on the draft 2023 Action Plan Amendment. This public hearing will be held via Zoom and in person at the Indiana Government Center South, located at 302 W Washington St, Indianapolis, IN 46204.

Participants are welcome to join the public hearing online only or in person at the hybrid meeting locations. Please email [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) or call 970-880-1415 for the Zoom meeting link or call-in number to attend the public hearing virtually. You can access the virtual public hearing by phone or computer.

**Public Hearing: Monday, April 15, at 4 p.m. ET**

In person at 1 N Capitol Avenue, Indianapolis, 46204 in the First Floor Conference Room.

Online (email [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) or call 970-880-1415 for the Zoom link)

Additional locations will be added and made available soon on OCRA's website.

You can also provide public comments via email to: [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) or via mail to: Office of Community and Rural Affairs, c/o 2023 Action Plan Amendment, One North Capitol, Suite 600, Indianapolis, Indiana 46204-2027. If you prefer to provide comments verbally or need assistance, please call 970-880-1415.

-----Version en Español -----

## **AVISO DE CAMBIOS DE COMENTARIOS PUBLICOS PARA EL PLAN DE ACCION DE VIVIENDA Y DESARROLLO COMUNITARIO ANUAL DEL 2024**

Por la presente se notifica que la Oficina de Asuntos Comunitarios y Rurales de Indiana (OCRA) y la Autoridad de Desarrollo Comunitario y de Vivienda de Indiana (IHCDA) han identificado la necesidad de cambiar el período de comentarios públicos para el Plan de Acción Anual del 2024, ya que HUD aun esta evaluando los montos de asignacion para los programas cubiertos por el Plan Consolidado.

OCRA e IHCDA tendran el Plan de Accion disponible para inspeccion publica antes de la audiencia publica. El publico esta invitado a revisar el Plan de Accion 2024 durante el horario de atencion 8:30 am a 5:00 pm ET, el 8 de abril al 8 de mayo de 2024, en el Oficina de Asuntos Comunitario y Rurales de Indiana, ubicada en 1 North Capitol Suite 600, Indianapolis, Indiana, 46204.

El Plan de Accion tambien estara disponible en la pagina web en [in.gov/ocra/cdbg/consolidated-and-action-plans/](https://www.in.gov/ocra/cdbg/consolidated-and-action-plans/) o [in.gov/ihcda/newsroom/action-plan](https://www.in.gov/ihcda/newsroom/action-plan). El Plan de Accion tambien puede ser adquirido por correo electronico a [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) o [SEnz@ihcda.IN.gov](mailto:SEnz@ihcda.IN.gov) o [CHudgens@ocra.IN.gov](mailto:CHudgens@ocra.IN.gov).

El publico puede atender a la segunda audiencia publica para informarse y prover comentarios sobre el Plan de Accion en linea o en persona. Para acceder a la segunda audiencia publica en linea envíe un correo electronico a [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) o llame al 970-880-1415 para obtener el enlace de a la audiencia en Zoom.

**La Segunda Audiencia Publica sera el Lunes 15 de abril a las 4:00 p.m. hora este.**

Puede atender en persona a 1 North Capital Avenue, Indianapolis, Indiana 46204. En la sala de conferencia del primer piso.

O

En linea llamando al 970-880-1415 para obtener el enlace de Zoom or escriba al correo electronico a [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) para obtener el enlace virtual.

Otras ubicaciones adicionales a las que el publico puede acceder seran prontament publicadas en la pagina web de la [Oficina de Asuntos Communitarios y Rurales](#).

Comentarios publicos pueden ser proveidos en persona o en linea.

OCRA e IHCDA anticipan presentar el Plan de Accion Anual 2024 a HUD en o aproximadament el 15 de mayo de 2024.

## **AVISO DE REGISTRO DEL INFORME 2023 ANNUAL ACTION PLAN ENMIENDA**

Por la presente se notifica que la Oficina de Asuntos Comunitarios y Rurales del Estado de Indiana planea modificar el Plan de Accion de Vivienda y Desarrollo Comunitario del 2023 ("Plan de Accion del 2023) con el Departamento de Vivienda y Desarrollo Urbano de Estados Unidos el 15 de mayo del 2024 aproximadamente.



Esta enmienda propone cambios al Programa de Rehabilitacion para Proprietarios tambien ajustara los procedimientos y regulacion de ingreso collectados por el programa.

El publico puede obtener information sobre la enmienda al Plan de Accion del 2023 por correo electronico contactando a [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) o [CHudgens@ocra.IN.gov](mailto:CHudgens@ocra.IN.gov). Copias fisicas pueden ser adquiridas de la Oficina de Asuntos Comunitarios y Rurales localizada en One North Capitol, Suite 600, Indianápolis, Indiana 46204-2027 entre las horas de servicio 8:30 a.m. to 5 p.m. ET.

Habrá un período de comentarios de 30 días desde el 8 de abril de 2024 hasta el 8 de Mayo de 2023. Los comentarios escritos se pueden enviar por correo postal o correo electrónico a [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com). Envíe comentarios por escrito a la siguiente direccion:

Office of Community and Rural Affairs  
c/o Enmienda al Plan de Accion del 2023  
One North Capitol, Suite 600  
Indianapolis, Indiana 46204-2027.

La audiencia publica se llevarán a cabo el 15 de abril de 2024 a las 4:00 p.m . El público esta invitado a participar en persona o virtualmente. La audiencia publica pude ser accedida:

En persona en 1 N Capitol Avenue, Indianapolis, 46204 en el cuarto de conferencias en el primer piso.

O virtual (email [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) o llame al 970-880-1415 para recibir el enlace de Zoom)

Otras ubicaciones adicionales a las que el publico puede acceder seran prontament publicadas en la pagina web de la [Oficina de Asuntos Comunitarios y Rurales](#).

Para solicitar ayuda o servicios de interpretación para la audiencia publica, o para obtener información sobre el proceso, comuníquese con Vanessa Bramante por correo electronico a [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) o llame al 970-880-1415.



**NOTICE OF FILING  
OF  
2024 Annual Action Plan for Housing and Community Development**

Notice is hereby given that the Indiana Office of Community & Rural Affairs (OCRA) and the Indiana Housing and Community Development Authority (IHCDA) plan to file their 2024 Annual Action Plan for Housing and Community Development (“2024 Action Plan”) with the U.S. Department of Housing & Urban Development on May 15, 2024, contingent on federal funding decisions. In the event that federal funding is delayed, the plan may be submitted to HUD after this date. The draft 2024 Action Plan contains a funding contingency plan.

The Annual Action Plan concerns programs that are funded through the U.S. Department of Housing & Urban Development under Title I of the Housing & Community Development Act of 1974 as amended. Annually, the state receives about \$65 million for housing and community development funds. This document governs the allocation of those funds among housing and community development activities (e.g., economic development initiatives, infrastructure improvements, and homeownership and rental programs).

The 2024 Action Plan provides information on the housing and community development needs priorities and one year spending plan for the Community Development Block Grant Program (CDBG), the Home Investment Partnership Program (HOME), the National Housing Trust Fund (NHTF), the Emergency Solutions Grant Program (ESG), and the Housing Opportunities for Persons With AIDS Program (HOPWA).

OCRA and IHCDA will have the 2024 Action Plan available for public inspection prior to its submission.

Members of the public are invited to review the 2024 Action Plan during the hours of 8:30 a.m. to 5:00 p.m., April 1 through April 30, 2024, at the Indiana Office of Community and Rural Affairs, One North Capitol, Suite 600, Indianapolis, Indiana 46204. The Action Plan will be available online at: <https://www.in.gov/ocra/cdbg/consolidated-and-action-plans/> or <https://www.in.gov/ihcda/newsroom/action-plans/>.

Information regarding the 2024 Action Plan can be obtained by writing to: Office of Community and Rural Affairs, c/o 2024 Action Plan, One North Capitol, Suite 600, Indianapolis, Indiana 46204-2027. Additional information may also be obtained via e-mail at [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) or [SEnz@ihcda.IN.gov](mailto:SEnz@ihcda.IN.gov) or [CHudgens@ocra.IN.gov](mailto:CHudgens@ocra.IN.gov).



Two public hearings will be held in a hybrid setting to discuss the methods of engagement and provide comments on the draft 2024 Action Plan. Public hearings will be held via Zoom and in person at the Indiana Government Center South (IGCS) located at 302 W Washington St, Indianapolis, IN 46204.

Participants are welcome to join the public hearing online only or in person at the hybrid meeting location(s). Please email [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) or call 970-880-1415 for the Zoom meeting link or call-in number to attend the public hearing virtually. You can access the virtual public hearing by phone or computer.

#### **Public Hearing 1: Tuesday, February 20th at 4 pm**

In person at 302 W Washington St., Indianapolis, 46204 in Conference Room D.

Online (email [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) or call 970-880-1415 for the Zoom link)

#### **Public Hearing 2: Monday, April 15th at 4 pm**

In person at 1N Capitol Avenue, Indianapolis, 46204 in the First Floor Conference Room.

Online (email [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) or call 970-880-1415 for the Zoom link)

Additional locations will be added and made available in coming weeks.

You can also provide public comments via email to: [vanessa@rootpolicy.com](mailto:vanessa@rootpolicy.com) or via mail to: Office of Community and Rural Affairs, c/o 2024 Action Plan, One North Capitol, Suite 600, Indianapolis, Indiana 46204-2027. If you prefer to provide comments verbally or need assistance, please call 970-880-1415.

### **AVISO DE REGISTRO DEL INFORME 2024 ANNUAL ACTION PLAN**

Habr  un per odo de comentarios de 30 d as desde el primero de abril de 2024 hasta el 30 de Abril de 2024. Los comentarios escritos se pueden enviar por correo o correo electr nico a [hello@rootpolicy.com](mailto:hello@rootpolicy.com). Env e comentarios por escrito a:

Office of Community and Rural Affairs  
c/o 2024 Action Plan  
One North Capitol, Suite 600  
Indianapolis, Indiana 46204-2027.



Las audiencias se llevarán a cabo el 20 de febrero de 2024 a las 4:00 p.m. y el 15 de abril de 2024 a las 4:00 p.m. Los miembros del público pueden participar en persona o virtualmente. Las reuniones tendrán lugar en:

**Audiencia 1: Martes 20 de febrero a las 4 p.m.**

En persona en 302 W Washington St., Indianapolis, 46204 en cuarto de conferencias D.

Virtual (email [avilia@rootpolicy.com](mailto:avilia@rootpolicy.com) o llame a 970-880-1415 para recibir el enlace de Zoom)

**Audiencia 2: Lunes 15 de abril a las 4 p.m.**

En persona en 1N Capitol Avenue, Indianapolis, 46204 en el cuarto de conferencias en el primer piso.

Virtual (email [avilia@rootpolicy.com](mailto:avilia@rootpolicy.com) o llame a 970-880-1415 para recibir el enlace de Zoom)

Se agregarán ubicaciones adicionales y estarán disponibles en las próximas semanas.

Para solicitar adaptaciones o servicios de interpretación para la(s) reunión(es), o para obtener información sobre el proceso, comuníquese con Avilia Bueno en [avilia@rootpolicy.com](mailto:avilia@rootpolicy.com) o 970-880-1415.