

HAMILTON COUNTY, INDIANA

FY18 CONSOLIDATED ANNUAL PERFORMANCE REPORT

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CR-05 - Goals and Outcomes

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

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

Hamilton County receives an annual allocation of Community Development Block Grant (CDBG) funds to assist with affordable housing, public infrastructure and social services. The allocation comes directly from the US Department of Housing and Urban Development. The Noblesville Housing Authority administers the CDBG funding on behalf of the Hamilton County Commissioners. For fiscal year 2018, Hamilton County received \$983,800. The fiscal year ran from October 1, 2018 until September 30, 2019. During the fiscal year Hamilton County expended \$419,592.62 on thirty-one open activities.

In order to receive CDBG funding Hamilton County must prepare a five-year comprehensive plan and an annual action plan. The annual action plan describes how funding will be spent to meet the goals and strategies developed in the five year comprehensive plan. To achieve these goals Hamilton County partners with a variety of organizations working towards specific goals. This year end report, or CAPER, will report the progress made during the fifth year of the Consolidated Plan.

In fiscal year 2018, Hamilton County worked with two non-profit developers on four activities to create additional affordable housing in Hamilton County. Of these four open housing activities two activities were completed during FY18. HAND completed the “Home Place Gardens” activity. This activity resulted in the construction of 10 units of affordable senior and family housing. Habitat for Humanity of Hamilton County completed one unit of housing benefiting one eligible family. These activities are fully reported in Section CR-20 of this CAPER. Activity 221 was a Habitat project to build one unit of housing for an eligible family. Habitat for Humanity repaid \$29,654.11 because the activity did not move forward. Hamilton County reallocated the funds to a PY 2019 activity. Activity 359 – Cherry Tree Road was put on hold when the local Habitat Chapter was folded into the Greater Indianapolis chapter. The property was transferred to Greater Indianapolis Habitat for Humanity when the two agencies merged, and Greater Indianapolis Habitat for Humanity is applying for additional federal funds through the state in January 2020, and they plan to complete the project in 2021.

Hamilton County works with a variety of public service agencies. During 2018 \$145,347.33 was expended on eligible public service activities serving 797 people with a variety of supportive services for eligible clients including medical services, emergency housing and services for victims of domestic violence, services for the developmentally disabled, senior services and legal services.

Hamilton County typically spends a large percentage of its funding each year on infrastructure projects in four participating communities, the

cities of Carmel, Fishers, Noblesville and Westfield, and in eligible unincorporated areas of Hamilton County. \$116,500.00 was expended during FY18 completing one infrastructure activity in unincorporated Hamilton County. Additionally, the city of Fishers completed one infrastructure activity during FY18 though all funding for this activity was expended in previous years. The county continues to work with the cities of Carmel, Fishers, Noblesville and Westfield to implement infrastructure activities during FY19.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Housing - Domestic Violence Shelter	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	20	53	265.00%			
Housing - Owner Occupied Repair	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	25	0	0.00%	10	0	0.00%
Housing - Rental Housing	Affordable Housing	CDBG: \$	Rental units constructed	Household Housing Unit	10	10	100.00%	1	10	1,000.00%
Housing - Rental Housing	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	10	0	0.00%	1	0	0.00%

Public Facilities - Seniors	Non-Homeless Special Needs		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	125	0	0.00%			
Public Facility Improvement	Non-Housing Community Development		Other	Other	4	0	0.00%			
Public Infrastructure - Neighborhood Improvements	Non-Housing Community Development	CDBG: \$743520	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2500	55	2.20%	8000	55	0.69%
Public Infrastructure - Neighborhood Improvements	Non-Housing Community Development	CDBG: \$743520	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		100	0	0.00%
Self Sufficiency - Basic Public Services	Homeless Non- Homeless Special Needs	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		175	0	0.00%
Self Sufficiency - Basic Public Services	Homeless Non- Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	561	56.10%	1700	561	33.00%

Self Sufficiency - Basic Public Services	Homeless Non- Homeless Special Needs	CDBG: \$	Homelessness Prevention	Persons Assisted	0	0		31	38	122.58%
Self Sufficiency - Domestic Violence Shelter Op.	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	572		0	115	
Self Sufficiency - Domestic Violence Shelter Op.	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	100	115	115.00%			
Self Sufficiency - Domestic Violence Shelter Op.	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	0	0		190	0	0.00%
Self Sufficiency - Legal Services and Fair Housing	Non-Housing Community Development	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	0	0.00%			
Self Sufficiency - Legal Services and Fair Housing	Non-Housing Community Development	CDBG: \$0	Other	Other	0	0		50	0	0.00%
Self Sufficiency - Transportation	Non-Housing Community Development		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50	0	0.00%			

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

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

Hamilton County CDBG program directed funding to programs and projects that meet the following criteria:

1. Expand the supply of safe, decent affordable housing.
 2. Support programs that help the most vulnerable households achieve self-sufficiency.
 3. Invest in public facility and public infrastructure needs of low-income neighborhoods.
 4. Improve institutional structure and coordination among providers across the County.
- Meet a goal of the 2014 - 2018 Consolidated Plan: Demonstrate a significance of need
 - Serve an eligible area within Hamilton County
 - Project or program is eligible under HUD rules
 - Create a visual impact in the neighborhood, particularly if an infrastructure project
 - Benefits persons at-risk of homelessness or who are homeless
 - Benefits a special needs population

As an urban county Hamilton County works with its incorporated communities to assist with eligible CDBG activities throughout the county. Though there are eight incorporated areas in Hamilton County, four have opted out to pursue larger amounts of CDBG funding through the State of Indiana Small Cities Program. The communities of Arcadia, Atlanta, Cicero and Sheridan have all opted out of the Hamilton County program. While they have been successful in applying for and receiving state funding for large infrastructure activities, by opting out, the county cannot expend CDBG funds in those communities for public services or housing activities such as home repair. These communities must depend upon not for profit agencies to provide these services as they can.

As a result of the limits HUD places on the funding amounts for public services (15%), most of the CDBG funding is used for major infrastructure activities in the participating communities of Carmel, Fishers, Noblesville, Westfield and eligible unincorporated areas. Funding is also used for housing activities as projects are developed. The county works with each of the participating community's to identify eligible activities and infrastructure needs. Each activity must take place in an eligible census tract or serve an eligible community and should also have a positive visual impact in the neighborhoods they serve.

During FY18 public service activities served 797 persons. NHA worked with services providers on reporting and attainment of goals. HAND

completed 10 units of affordable rental housing that are fully leased. HAND also completed two home repairs during FY18 assisting two households. Habitat completed one activity using CDBG funding to assist one eligible household. Public infrastructure activities completed in FY18 serve 55 households and included completion of storm sewer improvements.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG
White	671
Black or African American	88
Asian	28
American Indian or American Native	2
Native Hawaiian or Other Pacific Islander	10
Total	797
Hispanic	269
Not Hispanic	528

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

Hamilton County is predominately white and those served by the CDBG programs are likely to be white as a result. The 2010 Census showed the county population to be 88 percent white. In 2018, 83.9 percent of the beneficiaries served by the program were white. This is slightly lower than the census report.

The Hamilton County CDBG program served 128 minority individuals and families in the 2018 fiscal year, accounting for 16 percent of the total served. In FY 2018, 267 people, or 33.4 percent identified themselves as Hispanic. Service to minorities and Hispanic populations increased in 2018. Hamilton County will continue to encourage all subrecipients to promote their services and products to minority populations.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	983,800	419,593

Table 3 - Resources Made Available

Narrative

Hamilton County received \$983,800 in fiscal year 2018 in addition to any funding remaining from previous funding years. During the FY18 fiscal year, Hamilton County expended \$419,592.62. All recipients of CDBG funding have requirements dictating the rate at which the funds should be spent. The requirement states each recipient shall have no more than 1.5 times its annual allocation 60 days prior to the close of the fiscal year. For FY18 Hamilton County's expenditure rate was 1.93, meaning that the county has exceeded the spending ratio for fiscal year 2018. In order to be in compliance and not lose funding in the 2020 CDBG grant, NHA needs to expend the overage (\$1,211,383.00) by August 2, 2020. In response, NHA is working closely with Hamilton County to revise the current allocation procedures to ensure that CDBG funds will only be allocated if the organization can complete the activity and expend all funding within the program year. Based upon current discussions with the county and participating cities, NHA is confident the expenditure requirements will be met within the described time frame.

Additionally, Hamilton County is using public service funding that remained unspent from previous funding years for other eligible activities such as housing or infrastructure. This must be done in order to comply with certain restrictions limiting the amount of CDBG funding that can be used for public service activities each fiscal year.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City of Carmel	11	13.2	Infrastructure project
City of Fishers	11	12.8	Infrastructure project
City of Noblesville	8	8.8	Infrastructure project
City of Westfield	4	5.2	Infrastructure project
County wide	35	9.4	Public Services
Eligible Township Census Tracts	31	35.5	Storm Sewer repairs

Table 4 – Identify the geographic distribution and location of investments

Narrative

During FY18 \$116,500.00 of CDBG funds were expended to complete storm water drainage improvements in the unincorporated neighborhood of Clara-Knots. The communities of Carmel, Fishers,

Noblesville and Westfield are developing projects that will be implemented during the FY19 program year. The balance of allocated Housing dollars from PY2018 equaling \$110,950 has been reallocated to PY2019 for use in a planned Hamilton County eligible storm water improvement project to take place in 2020.

Noblesville will complete their Seminary Park activity during the fall of 2019 using \$274,778.67 of CDBG funds. White River Christian Church is working on the ADA restroom project that will use \$35,000 of CDBG funding and JANUS Developmental Services will complete their Midland Trace Trail activity (282) during 2020 that will use \$41,250 of CDBG funding. All these activities will be fully reported in the FY19 CAPER.

Leveraging

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

Hamilton County encourages efforts by Carmel, Fishers, Noblesville and Westfield to leverage federal investments as part of public infrastructure projects in their communities. During the 2018 fiscal year no additional funding was identified. The Hamilton County CDBG program did not utilize any public owned land or property to address a need identified in the Consolidated Plan.

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	10	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	10	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	1	0
Number of households supported through Rehab of Existing Units	10	0
Number of households supported through Acquisition of Existing Units	0	0
Total	11	0

Table 6 – Number of Households Supported

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

The Hamilton County Home Repair program is dedicated to assisting low and moderate income homeowners with repairs of an emergency nature. Repairs include emergency heat repair, plumbing, electrical or roof leak repairs. HAND received CDBG funding to implement a home repair program in Hamilton County. HAND has received funding from Hamilton County to implement a county wide home repair program (Activity 326). Two households received assistance from this program during FY18

including one roof repair and one sewer lateral repair project. These two activities along with future home repair activities will be fully reported in the FY19 CAPER.

Hamilton Area Neighborhood Development, Inc. (HAND)

Activity 288 – HAND Home Place Gardens - The Hamilton County Area Neighborhood Development (HAND) has completed a project that is located in Home Place and consists of 10 units comprised of eight 1 and 2 bdrm duplexes for seniors 55 and older and two single family homes with three bedrooms reserved for survivors of violent crime. Construction of the project is completed and ten units have been leased.

Habitat of Hamilton County

Activity 221 – Habitat 8th Street build. This activity will not move forward. Habitat for Humanity repaid \$29,654.11 because the activity did not move forward. Hamilton County reallocated the funds to a PY 2019 activity.

Activity 253 – Combs Ave. – This project is complete. The unit is occupied by one eligible household.

Activity 259 – Cherry Tree Road – Since this project was initiated, Habitat for Humanity of Hamilton County has been folded into the Greater Indianapolis Habitat for Humanity Chapter. As a result, NHA has been meeting with representatives from Indianapolis to develop a plan to complete the activity. The property was transferred to Greater Indianapolis Habitat for Humanity when the two agencies merged, and Greater Indianapolis Habitat for Humanity is applying for additional federal funds through the state in January 2020, and they plan to complete the project in 2021.

Discuss how these outcomes will impact future annual action plans.

Though Hamilton County has made progress achieving many of the goals outlined in the 2014-2018 Consolidated Plan there are steps that could be taken to promote completion of activities in a more timely manner. Several steps the county is exploring include:

- Enforce the contract language requiring recipients and grantees to complete activities and draws in a timely manner
- Direct more funding towards projects that meet goals not completed in 2018
- Update applications to require documentation of additional funding if required. Also require documentation of progress made by the applicant if there are zoning issues or the activity requires extension of infrastructure.

Over the last several Action Plans Hamilton County has allocated funding for eligible housing projects. Since no activities have been identified, the county is reallocating this funding to eligible infrastructure activities such as storm water improvements and other activities that significantly impact eligible neighborhoods.

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

the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	0	0
Low-income	10	0
Moderate-income	0	0
Total	10	0

Table 7 – Number of Households Served

Narrative Information

Hamilton County must follow the income guidelines set by the US Department of Housing and Urban Development when serving individuals and households. These guidelines are set for metropolitan areas each year. Hamilton County is included as part of the Indianapolis Metropolitan Statistical Area, and must follow the limits set for the entire area. Many of individuals served by public services in the 2018 fiscal year, were extremely low income individuals, earning below 30 percent of the area median income.

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

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

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

Hamilton county funds several organizations that assist homeless individuals as well as special needs populations. One program that targets the homeless population is Alternatives of Madison County(activity 321). This shelter, although located outside Hamilton County, serves many domestic violence victims from Hamilton County including 11 individuals during FY18. Prevail (activity 323) also serves Hamilton County victims of domestic violence including homeless prevention. In fiscal year 2018 the organizations served 104 victims.

Homeless individuals can also be served by other local services funded with CDBG funds, such as the Trinity Free Clinic (activity 320), Heart and Soul Clinic (activity 316) and the Good Samaritan Network (activity 324). These providers can serve as the first line of services for homeless individuals reaching out in Hamilton County for help. However, the reports provided to the Noblesville Housing Authority, the CDBG administrator, do not include homelessness status.

Individuals and households at-risk of homelessness can seek help through emergency assistance programs and payments at the local Salvation Army (activity 313), Good Samaritan Network and Family Promises (activity 325). These programs provide emergency payments for extremely low and low income residents of Hamilton County. The payments can be used for a variety of emergency uses including utilities, rent or mortgage, car repairs, etc.. This program is coordinated through the township trustees and is the last opportunity for families trying to avoid a homeless situation. In FY18 thirty-nine individuals received assistance through this program.

Addressing the emergency shelter and transitional housing needs of homeless persons

Alternatives of Madison County shelters victims of domestic violence from Hamilton County, offering a temporary and safe place to live. Beyond the shelter, Alternatives of Madison County has a transitional housing program, assisting individuals and families as they move from the shelter to permanent housing. This supportive housing program can last up to two years as the families establish lives outside of domestic violence. The program is located in Anderson, Indiana, Northeast of Hamilton County, and offers a variety of services for domestic violence victims. Services include 24-hour crisis center and response team, emergency transportation, case management, support and advocacy and children's services. During the 2018 fiscal year, Hamilton County served 11 domestic violence victims through the Alternatives program.

Due to low point in time count numbers in Hamilton County, homeless services and shelters are often

placed in other counties where a need and number of homeless individuals is greater. Families with children continue to seek shelter in neighboring counties, Madison County or Marion County.

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

Hamilton County awarded \$20,000 to the Good Samaritan Network and \$50,000 to Family Promise of Hamilton County in FY18 to help with homelessness prevention. The Good Samaritan Network offers rent and mortgage assistance for households at risk of losing their housing either through eviction or foreclosure. The program coordinates with township trustees to find families and households needing this service. For many families, this program is the last opportunity to avoid homelessness. In fiscal year 2018, the program assisted 38 households.

Family Promise of Hamilton County works with homeless families to assist with housing needs as well as helping the family develop the tools and skills needed to avoid a homeless situation in the future. As of October 31, 2019, Family Promise has communicated with 57 households; with 46 completing pre-screening procedures and 12 families participating in the full program.

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

The Homeless Prevention and Rapid Rehousing Program (HPRP) was created by funds from Title XII of the American Recovery and Rehabilitation Act of 2009 (ARRA). It allows expanded prevention and/or rapid rehousing for persons with moderate barriers to stable permanent housing.

The idea behind HPRP is to put “housing first,” placing a homeless individual in permanent housing, then providing the services needed to that individual or household to keep them housed. Previously, the common method was to address needs of the individual or household at the shelter, working towards a transitional housing situation and then permanent housing. The housing first model stabilizes housing for the household first, helping the household feel more secure and able to address the other needs in their lives.

Hamilton County is part of Region 8 in the State of Indiana Continuum of Care, made up of four counties. Building on HPRP's success, the Emergency Solutions Grant changed from a emergency shelter grant to follow the model of placing homeless households in permanent housing, and supporting housing with services.

Many stakeholders continue to state the greatest need of low income individuals is the development of more affordable housing for extremely low income households. This follows a housing first model of addressing homelessness, placing individuals in permanent housing that is affordable over sheltering them for 60-90 days before placing them in housing. While there remains a planning committee for the development of a Domestic Violence shelter, the CoC for Region 8 is advocating for more affordable rental housing in Hamilton County so that households who are homeless or at-risk of homelessness do not have to exit the County in search of housing.

Hamilton County funded one affordable rental housing projects in fiscal year 2016 Home Place Garden. The project added 10 new affordable rental housing options for residents and was completed in 2018. Hamilton Area Neighborhood Development, Inc. (HAND) is the non-profit developer.

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

Actions taken to address the needs of public housing

The Noblesville Housing Authority (NHA) is the public housing agency serving Hamilton County by means of a cooperative agreement with the State Housing Authority also known as the Indiana Housing & Community Development Authority (IHCDA). It does not manage public housing units as its neighboring housing agencies in Anderson and Indianapolis. The Noblesville Housing Authority only offers the Housing Choice Voucher (HCV) program a/k/a Section 8 vouchers to the low-income households. The Section 8 voucher program offers subsidy to a household to allow them to rent any residential unit in the local housing authorities' jurisdiction. The household will pay approximately 30 percent of their monthly adjusted income towards monthly housing costs and the Housing Choice Voucher covers the remaining cost.

IHCDA also has a voucher program serving Hamilton County with a total of 90 households receiving assistance. Households receiving assistance from the IHCDA program do not need to transfer into the NHA program in order to receive assistance in the Hamilton County jurisdiction. The cooperative agreement between the NHA and IHCDA has enabled more households to benefit from the services and amenities in Hamilton County and has enabled greater choice for voucher recipients without the additional paperwork that is associated with HCV portability.

The most immediate need for NHA is finding additional funding and Housing Choice Vouchers to provide voucher assistance to Hamilton County residents in need. NHA has an Annual Contribution Contract (ACC) with HUD for 189 Housing Choice Vouchers (HCV) monthly. The number of HCV vouchers increased by four (4) during PY 2018, when a ten (10) Project Based Voucher housing development located in Sheridan allowed their HUD Housing Assistance Payment (HAP) Contract to terminate and convert the units to market rate. At the time only four of the ten units were occupied so the Noblesville Housing Authority was able to begin administering services to those remaining households with four (4) Enhanced Housing Choice Vouchers.

Only twenty-nine (29) vouchers became available in the past year through NHA. Turnover of vouchers is slow as most households do not "graduate" from needing a subsidy. The majority of voucher holders are elderly and disabled, returning their voucher when they cannot live independently or pass away. Demand for accessible one-bedroom housing units is the greatest need in the community.

Demand for new vouchers has increased with the cost burden of housing in Hamilton County increasing for many families, including the elderly. The waiting list last opened from October 2, 2018 to October 9, 2018. During the open waiting list 1,441 households signed up for housing assistance, and 200 households were selected based upon local preference and lottery. There are currently 148 households on the waiting list. NHA plans to open the waiting list up in January 2020 for Non Elderly Disabled (NED) households because 75 of the 189 Housing Choice Vouchers are targeted for NED households and there are less than 30 NED qualified households on the waiting list. To qualify as a NED household, the head or co-head of the household must be under age 62 with a disability as defined by HUD.

During the Program Year, NHA provided outreach to all of its current participants to encourage them to become members of the Resident Advisory Board and also to provide input for the 5-Year PHA Plan. A total of 8 participants are currently on the Resident Advisory Board.

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

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

During the Program Year, NHA provided outreach to all of its current participants to encourage them to become members of the Resident Advisory Board and also to provide input for the 5-Year PHA Plan. A total of 8 participants are currently on the Resident Advisory Board.

NHA does not currently offer homeownership with its program to voucher holders; however the agency would consider this approach.

Actions taken to provide assistance to troubled PHAs

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

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

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

While barriers to affordable housing can come from anywhere, the U.S. Department of Housing and Urban Development (HUD) recognizes a few universal barriers. Local and state regulations on zoning and building are the most recognized barriers to affordable housing. With increased regulation comes an increased cost to build housing that meets all regulations. Hamilton County created a new Analysis of Impediments to Fair Housing in Fiscal Year 2018. The document found the following impediments:

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

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

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

Large apartment complexes with corporate ownership represent nearly all rental housing stock, requiring corporate approval of rental applications will often over-ride local management's ability to accept low income renters with challenges such as short employment history and credit history.

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

Hamilton County has set goals to develop rental housing for underserved needs households in the community, including extremely low-income households, senior households, or recently homeless households. HAND has completed construction of a 10 unit rental project that serves low income seniors. Future projects are still in the planning phases.

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

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

Any households with children who test high for lead paint blood levels may be referred to the Noblesville Housing Authority or HAND. Funding from the owner occupied assistance program may resolve lead based paint hazards found in the home. Any work completed was in compliance with the Environmental Protection Agency's lead based paint rules and regulations.

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

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

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

In 2018 Hamilton County funded a variety of social service projects to assist low-income families and individuals, many who live below the poverty line. Hamilton County funded programs such as the Trinity Free Clinic, Shepherd Center, Heart and Soul Clinic, HOPE Clinic, Meals on Wheels and Prevail. Of those served by these agencies, most of the individuals earned income less than 30 percent of the median income.

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

The 2018 Action Plan stated that the institutional structure currently used to develop affordable housing may face organizational and other non-regulatory barriers to affordable housing development. Consultations with community leaders and stakeholders have suggestions as to the barriers that the hard data may not provide. These include barriers that prevent, or increase the challenge of affordable housing development. The barriers shared by those leaders and stakeholders include:

- High costs of property acquisition near amenities in the more developed communities of Hamilton County, such as Carmel, Fishers, Noblesville and Westfield
- Overcoming challenges developing affordable housing, subsidizing projects large enough to serve the largest populations with cost burden, households earning 0-30 percent of the area median income
- The marketability of affordable housing and increasing support from local civic leaders and the community for this type of development
- The lack of transportation where creation of affordable housing development is less of a financial challenge
- Large apartment complexes with corporate ownership represent nearly all rental housing stock, requiring corporate approval of rental applications will often over-ride local management's ability to accept low income renters with challenges such as short employment history and credit history

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

The Good Samaritan Network is the primary way to connect all service providers throughout Hamilton County. The network includes a variety of providers, from large/corporate health providers to smaller, faith based food pantries. The Network will continue its efforts to build capacity and coordinate service provisions across the county in the coming year.

Hamilton County and the Noblesville Housing Authority want to support and expand the efforts of this organization to not only build up the capacity of its members, but to also connect the members to local housing providers and the Region 8 Planning Council for the Indiana Continuum of Care. By connecting the three different organizations, planning efforts will be more streamlined and projects developed from those efforts will go more to address the households and individuals with the most need.

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

Hamilton County created a new Analysis of Impediments to Fair Housing in 2019. The new analysis

confirmed the greatest impediment to fair housing is the lack of affordable housing in Hamilton County. The document found the following impediments:

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

Hamilton County will use partnerships with State Government, local non-profit housing providers, local public service providers or community development advocacy groups to go beyond the steps listed in this plan to promote fair housing. Hamilton County will support other initiatives by the State of Indiana, the City of Anderson and the City of Indianapolis, all neighboring jurisdictions with their own *Analysis of Impediments to Fair Housing*, to promote fair housing. Such initiatives may include education programs related to fair housing, homeownership training or landlord/tenant legal services. Such additional efforts may be listed in annual reports but the above initiatives and resolutions will be completed by the Hamilton County over the next three years, 2019-2022.

As described in last years CAPER, a discrimination complaint was filed alleging discrimination in the form of two Noblesville ordinances for specific developments to be developed in Noblesville. Ordinance 32-6-08 and Ordinance 21-06-13, were approved by the Noblesville City Council, and the language on the ordinances indicated they were limiting the size of units to two bedrooms or smaller, and also prohibiting the seeking of or use of federal, state, or local rent subsidies for the two Noblesville area proposed developments to be known as Noble West and Promenade Landing.

Following the execution of the Voluntary Compliance Agreement the Noblesville Housing Authority began reaching out to elected officials, community stakeholders, and area non-profits with a vested interest in affordable housing and fair housing in Hamilton County.

On January 8, 2019 the initial meeting of the Hamilton County- City of Noblesville Affordable Housing Working Group met at the Noblesville City Hall at 10:00 a.m. local time. This meeting was structured such as to be an introduction to the issues at hand, a review of the Fair Housing complaint filed against the City of Noblesville and Hamilton County, a review of the Voluntary Compliance Agreement between HUD and the City of Noblesville and Hamilton County, and to serve as a catalyst to open the lines of communication between the various stake holders and representatives.

Subsequent meetings and discussions with individuals in attendance have taken place since January in order to better develop the ideas and thoughts that were discussed during the initial Working Group meeting. Since the initial Working Group meeting the NHA has begun working with the Noblesville Diversity Coalition to develop an affordable housing outreach and education plan for Noblesville.

CR-40 - Monitoring 91.220 and 91.230

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

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

Initial Review of Project Eligibility

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

Ongoing Review of Project Compliance

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

Follow-up and Enforcement

1. Compliance concerns are addressed at all phases of an activity, as soon as the project manager is aware of the issue. Technical assistance is provided as necessary to maintain compliance.
2. Annual reviews of sub-recipient activities are conducted by the project manager, using a checklist of areas to be reviewed.

3. Sub-recipients may be required to file a Certified Public Accountant (CPA) annual report of sub-recipient's financial stability and federally funded project expenditures. Records shall be maintained for five years after project closeout.
4. Enforcement of activities not in compliance shall follow Part 85.43 with the right of appeal, as well as termination of a contract/agreement.

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

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

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

To be completed after public notices issued

CR-45 - CDBG 91.520(c)

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

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

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

No

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