

HAMILTON COUNTY, INDIANA

CONSOLIDATED PLAN

2019-2023

ANNUAL ACTION PLAN 2019

Executive Summary

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

1. Introduction

The U.S. Department of Housing and Urban Development (HUD) awards Community Development Block Grant (CDBG) funds to communities across the United States to address a wide range of eligible housing and community development needs. According to HUD, the CDBG Entitlement Program is designed to “develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons...The CDBG program works to ensure decent affordable housing, to provide services to the most vulnerable in our communities, and to create jobs through the expansion and retention of businesses.” CDBG funds are allocated between states and location jurisdictions, both “entitlement” and “non-entitlement” communities, with states distributing funds to non-entitlement localities. Entitlement communities are comprised of central cities of Metropolitan Statistical Areas (MSA) with populations of at least 50,000 and urban counties with populations of at least 200,000. CDBG allocations are determined based on a variety of factors including the poverty rates, population size and growth rates, and housing conditions such as the age of the housing stock and other housing problems such as overcrowding.

Hamilton County is in the Indianapolis-Carmel-Anderson, Indiana MSA, an 11-county MSA in central Indiana. According to the 2018 American Community Survey Population Estimates, as of July 1, 2018 the population in Hamilton County, Indiana was 330,086 persons. As such, Hamilton County qualifies as an Urban Entitlement Community for the purposes of the CDBG program. As an Urban County, Hamilton County works with its incorporated cities to assist with eligible CDBG activities throughout the county. Though there are eight incorporated cities and towns 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 CDBG program. While they have been successful in applying for and receiving CDBG funding for large infrastructure activities through Indiana’s small cities CDBG program, by opting out, the county cannot expend CDBG funds in those communities for public services or housing activities such as home repair. The Noblesville Housing Authority (NHA) is the administrator of the CDBG Program on behalf of the eligible portions of the county, responsible for all strategic planning, award allocation, administration and monitoring of CDBG funded programs and projects.

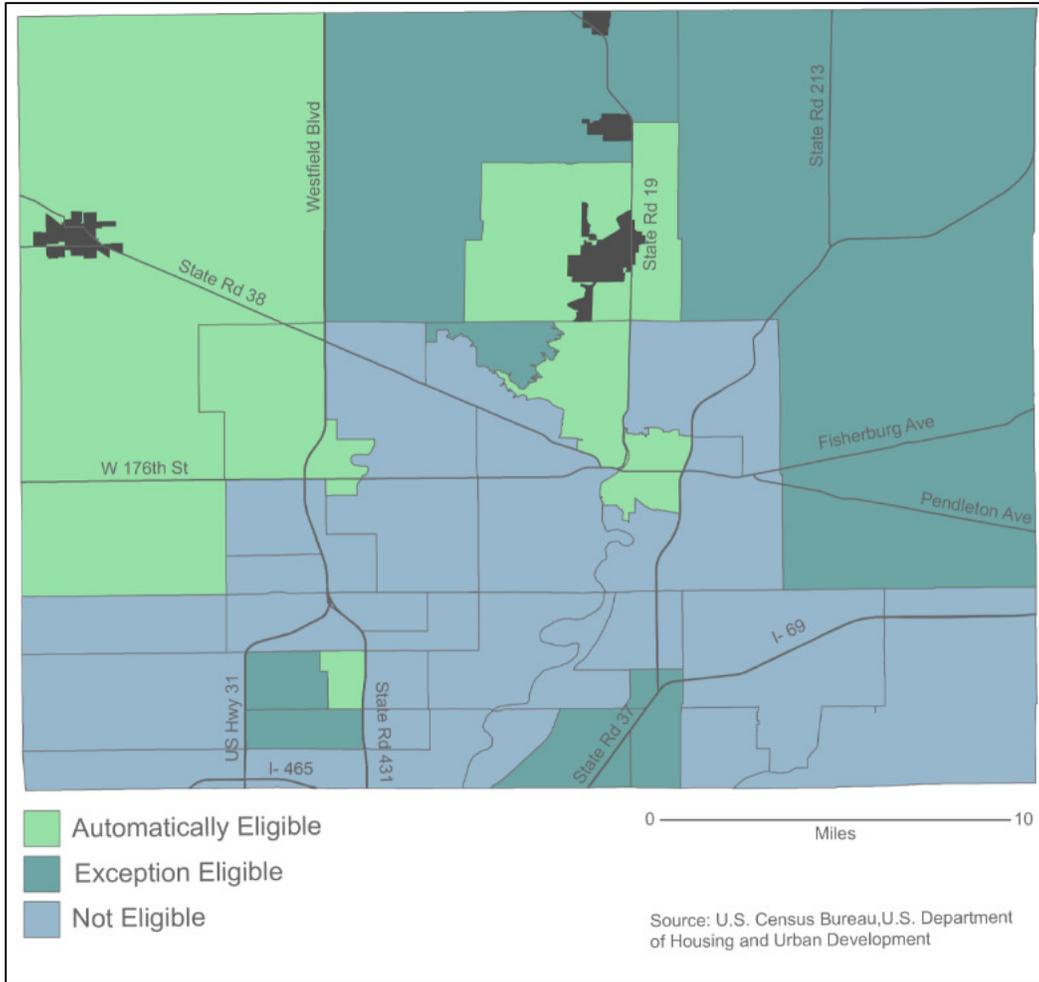
According to HUD, the CDBG program requires that each CDBG funded activity must either:

- principally benefit low- and moderate-income (LMI) persons,
- aid in the prevention or elimination of slums or blight, or
- meet a community development need having a particular urgency.

Of the aforementioned three eligible activities, HUD requires that at least 70 percent of CDBG funds must be used for the first - activities that benefit low and moderate-income persons – and can include for example, programs that provide housing, jobs, and/or services. There are four primary approaches through which CDBG objectives can be met.

First, a place based project. Under this approach, oftentimes referred to as the “Low Mod Area Benefit”, CDBG funds are directed to a designated area rather than to specific individuals or households. In other words, funds can be used to improve a neighborhood even if some of those living in the neighborhood that will benefit from the funds are middle income or upper income households. Activities may qualify for CDBG assistance if the activity will benefit all the residents of a primarily residential area where at least 51 percent of the residents are low- and moderate-income persons, i.e. area-benefit (LMA). Such area-benefit activities include things such as acquisition of land to be used as a neighborhood park, construction of a health clinic or other community center/facility, improvements to public infrastructure, etc. Currently Hamilton County has 12 area-benefit eligible block groups.

In addition to the automatically eligible areas, HUD allows for an exception for select communities given that “some communities have no or very few areas in which 51 percent of the residents are low- and moderate-income. For these grantees, the CDBG law authorizes an exception criterion for such grantees to be able to undertake area benefit activities. Specifically, section 105(c)(2)(A)(ii) of the Housing and Community Development Act of 1974, as amended, states that an activity shall be considered to principally benefit low and moderate income persons when the area served by such activity is within the highest quartile of all areas within the jurisdiction of such city or county in terms of the degree of concentration of persons of low and moderate income.” Thus, each “exception grantee” has a personalized threshold, which “represents the minimum percentage of low- and moderate-income persons that must reside in the service area of an area benefit activity for the activity to be assisted with CDBG funds.” (HUD) The 2019 exception thresholds are based on the 2011-2015 American Community Survey (ACS). Hamilton County has historically been and continues to be an exception grantee. The 2019 fiscal year exception threshold for Hamilton County is 37.83 percent; this represents the minimum percentage of low and moderate income persons that must reside in the service area of an area benefit activity for the activity to be assisted with CDBG funds. The following table and corresponding map illustrates the automatically eligible and exception eligible areas in Hamilton County in 2019 for activities to be assisted with CDBG funds.



Note: Blacked out areas are the towns which have opted out of the Hamilton County CDBG program.

Source: Novogradac & Company LLP, June 2019

AREA-BENEFIT ELIGIBLE AREAS*

Census Tract	Block Group	Number of Low-Mod Persons	Percentage of Low-Mod Persons	Census Tract	Block Group	Number of Low-Mod Persons	Percentage of Low-Mod Persons
<i>Automatically Eligible</i>				<i>Exception Eligible</i>			
110509	2	945	76.52%	110201	1	390	49.06%
110700	2	935	71.92%	110201	3	395	47.31%
110700	1	995	70.82%	110401	1	930	46.62%
110202	2	480	67.13%	111007	2	570	46.15%
110300	4	520	61.90%	110807	2	745	45.71%
110300	5	585	59.69%	111006	2	1,245	45.52%
110202	4	710	56.35%	110700	3	275	41.98%
111007	1	1,245	55.46%	110201	2	465	40.26%
110600	3	845	55.23%	110810	2	600	40.00%
110300	2	1,540	54.51%	111008	1	1,380	39.83%
110600	2	660	53.44%	110512	1	965	39.47%
110401	2	615	52.12%	110100	3	2,865	38.69%
				110600	1	455	38.40%

*Includes automatically eligible (shaded) and exemption eligible areas.

Source: Novogradac & Company LLP, June 2019

As illustrated, using the exception threshold allows for twice as many area-benefit eligible areas throughout the county, though the majority of the eligible areas are still located in the central and northern areas of the county.

Second, an individual-based project. Activities that target low- to moderate-income persons are eligible for CDBG funds. To determine eligibility the activity must either: benefit a clientele that is generally presumed to be principally low- to moderate income (for example, survivors of domestic violence, homeless persons, disabled adults, elderly persons, persons living with HIV/AIDS, etc.), document that at least 51 percent of the clientele served by the activity are low- to moderate-income persons, have income eligibility requirements limiting the activity to low- to moderate-income persons only, or be of a nature and in a location that it can reasonably be concluded that beneficiaries of the activity are primarily low- and moderate-income persons.

Third, housing projects that provide or improve permanent housing which are occupied by low- to moderate-income households. Examples of housing projects include the addition or renovation of housing units where the units will be occupied by low- and moderate-income households and leased at affordable rents or rehabilitation of single-family housing units occupied by a low- to moderate-income household.

Fourth, job retention and creation projects where at least 51 percent of jobs created/retained will be for low- to moderate-income persons.

According to HUD, eligible activities include: acquisition of real property, disposition, public facilities and improvements, clearance, public services, interim assistance, relocation, loss of rental income, privately-owned utilities, rehabilitation, construction of housing, code enforcement, special economic development activities, microenterprise assistance, special activities by Community Based Development Organizations (CBDOs), homeownership assistance, planning and capacity building, program administration costs, and miscellaneous other activities.

Hamilton County began receiving CDBG funding in 2004. To receive funding each year, Hamilton County must complete a Five-Year Consolidated Plan. The Consolidated Plan is an assessment of the needs and available resources in the community, relating to housing, social and public services, and public infrastructure. The Consolidated Plan then outlines priorities and goals to address those needs. Each year thereafter for the five year period, the NHA will write an Action Plan, outline specific projects and funding resources that will be used to meet the priorities and goals. At the end of each year, the NHA will write a Consolidated Annual Performance and Evaluation Report (CAPER) to report the progress towards each of the Consolidated Plan goals. These three documents enable the public, elected officials and HUD to understand the needs in the community, provide input and measure progress and investment in the community.

This Five-Year Consolidated Plan will cover the period October 1, 2019 through September 30, 2024. The Action Plan for program year 2019 runs from October 1, 2019 to September 30, 2020. It is expected that Hamilton County will receive approximately \$1,032,481 for Program Year 2019 starting October 1, 2019.

The Consolidated Plan template provided by HUD relies on the 2011-2015 ACS data. It is worth noting that there have been two data releases since the 2011-2015 ACS data release, the most recent of which is the 2013-2017 ACS data set. For the purposes of this Consolidated Plan, following HUD, we have relied on the 2011-2015 ACS data. Where necessary, we have also provided more current data.

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

Making a full assessment of housing, homelessness and public infrastructure poses a few challenges for Hamilton County.

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

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

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

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

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

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

3. Evaluation of past performance

The Noblesville Housing Authority (NHA), as a representative of Hamilton County, has implemented Community Development Block Grant funded programs over the past 15 years. Over that time, the NHA has made great strides to assist low-income households in the community.

The priority needs listed in the 2013-2018 Consolidate Plan include: Housing, Social Services, Public Infrastructure and Facility Improvement, and Institutional Structure. Hamilton County has completed the first four years of the five year plan and is currently in the fifth year. During the 2014 to 2017 Program Years, which include October 1, 2014 to September 30, 2018, a total of \$2,853,495 in CDBG funds was disbursed for completed activities. The following section summarizes the distribution of these funds across the priority needs reflected in the plan.

- \$1,479,872 (52 percent) in Public Improvements & Facilities (sidewalk improvements, flood drainage improvements, parks and recreation improvements, ADA accessibility improvements, etc.)
- \$604,987 (21 percent) in Administration & Planning (management of CDBG program)
- \$478,067 (17 percent) in Services (services for victims of domestic violence, dating violence, sexual assault, or stalking, senior services, legal services, health services, transportation services, services for persons with disabilities, etc.)
- \$195,000 (7 percent) in Acquisition (of land/improvements for affordable housing purposes)
- \$95,969 (3 percent) in Housing (home repairs)

Additionally, preliminary numbers for PY18 indicate the following accomplishments:

- Domestic Violence Shelter - Alternatives (11 persons served)
- Utility and Rent Emergency Assistance - Good Samaritan Network (29 persons served)
- Public Service – Services for persons with disabilities - Janus (69 persons served)
- Senior Services - Meals on Wheels (25 persons served)

- Domestic Violence Services - Prevail, Inc. (104 persons served)
- Senior Services - Shepherd's Center (123 persons served)
- Dental Health Services - Trinity Free Clinic (413 persons served)
- Infrastructure projects (approximately 1,800 persons served)
 - Storm water rehab project in southern Clay Township – 1,000+ persons
 - Rehabilitation of Seminary Park in Noblesville (addition of ADA ramps and sidewalk, improve access to the park, installation of new lighting, plantings and historical signage) – 800+ people

Despite the successes, challenges acquiring inexpensive properties for affordable housing development, growing demand for public services and increasing numbers of households who are falling behind the growing wealthy communities continue.

4. Summary of citizen participation process and consultation process

Novogradac and Company LLP (referred to hereafter as Novogradac), a consulting firm hired by the Noblesville Housing Authority conducted consultation interviews with local stakeholders. The purpose of the consultations is to get a perspective about the needs in the community that hard data does not provide. A complete list and summary of comments is included later in this document.

The disjointed nature of the county, with many different jurisdictions and hidden poverty, makes soliciting input from the community a challenge. Past efforts to reach the stakeholders and the public through blanket efforts have failed. To complete this Consolidated Plan participation process, the NHA relied on a variety of approaches in an attempt to increase participation and input. The planning process involved a combination of online surveys; stakeholder meetings with non-profit organizations, local housing providers, social service agencies, community and economic development organizations, government agencies, and members of the general public, multiple surveys; and, one-on-one consultations.

- 2018 Six stakeholder listening sessions (open to the public) (71 attendees)
- 2018 Hamilton County Housing Needs Assessment survey (603 respondents)
- 2019 Hamilton County Consolidated Plan survey (170 respondents)
- 2019 Stakeholder interviews
- 2019 Stakeholder meetings including meetings with County Commissioners, the Good Samaritan Network, Region 8 Homeless Planning Council Meeting, Public Meetings, as well as several one-on-one meetings with select stakeholders.

The draft form of this Consolidated Plan was available for public comment beginning July 10, 2019 and ending August 9, 2019. Draft copies of the document were available in the Noblesville Housing Authority offices and electronically via the Hamilton County website. The Noblesville Housing Authority received 57 comments during that time. All comments were accepted and where applicable incorporated into the final document.

5. Summary of public comments

Public comment for this Consolidated Plan was solicited through several approaches. First, the 2019 Hamilton County Consolidated Plan Survey, 170 respondents completed the survey. Respondents were asked a series of questions regarding community housing and non-housing development needs. Second, the NHA hosted or participated in a series of meetings with key stakeholders as well as the general public. The main takeaways from the 2019 Consolidated Plan Survey are included below:

- The survey asks respondents to allocate 100 points across three potential priorities with 100 being high priority and 0 being no priority across three categories: affordable housing, addressing homelessness, and public facility/infrastructure. On average, respondents assigned 46 points to affordable housing, 31 points to addressing homelessness, and 28 percent to public facility/infrastructure. This suggests affordable housing continues to dominate the needs of people in Hamilton County.
- With the housing needs assessment, respondents were most likely, on average, to indicate that emergency assistance (housing and utility) outweighs long-term affordable housing.
- Within public infrastructure, storm water drainage/flooding improvements were most likely to be selected as priorities for CDBG funds.
- Within homelessness and special needs, respondents were most likely to indicate that CDBG funds should be spent on a domestic violence and/or emergency shelter followed by employment training.
- Within public facilities, mental health and substance abuse treatment facilities were most likely to be selected as priorities for CDBG funds.
- Within social services, transportation assistance, mental health services, substance/abuse treatment services, and domestic violence services were most likely to be selected as priorities for CDBG funds, though it is worth noting that on average, services for seniors, veterans, and persons with a disability were only slightly less likely to be identified as priorities for CDBG funds than the previously indicated services.
- Within employment and job retention programs, providing business assistance to provide access to fresh food in high need areas, was the most likely to be selected as a priority for CDBG funding; this is followed by vocational training.

In addition to the above, public input was also solicited and incorporated into the 2018 Hamilton County Housing Needs Assessment as well as through notes taken at public meetings.

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

The draft form of this Consolidated Plan was available for 30 days for public comment beginning July 10, 2019 and ending August 9, 2019. Draft copies of the document were available in the Noblesville Housing Authority offices for comment and electronically via the Hamilton County website. The Noblesville Housing Authority received 57 comments during that time. All comments were accepted and where applicable incorporated into the final document.

7. Summary

This Consolidated Plan is part of the efforts of Hamilton County and community stakeholders to make the County a “good place to live” for all households in the community, both the wealthy and low income households. The document will outline the needs in the community and possible solutions to address those needs. The needs of each group were determined based on an analysis of secondary data including a review of service providers’ websites and annual reports as well through the consultation process which included both surveys of key stakeholders and the general public to assess community-wide needs as well as one-on-one interviews with local stakeholders to assess group-specific needs.

Both the secondary data and the consultations indicate that the most immediate and sizeable need for is for additional affordable housing options. Housing, while plentiful in Hamilton County, is not affordable to all who live and/or work here. Additionally, in recent years, housing costs in Hamilton County have increased while median incomes have remained stable. This suggests that housing is becoming less affordable. Both owner and renter Extremely Low Income (ELI) to Low Income (LI) households are living with cost burdens because the supply of affordable housing for these households is extremely limited and much of the affordable supply that exists is not available to these households as it is occupied by higher income households. Incentives for developers and funding projects that address this specific need can help to reduce the economic insecurity for these cost-burdened households. Additionally, incentivizing and encouraging the development of affordable owner options for seniors looking to downsize could have a two-fold impact: first, provide seniors with affordable housing targeted to their needs (e.g. single-story, ADA accessible, etc.) and second, release some of the older, larger housing stock to younger families looking for affordable starter homes.

In addition to affordable housing, there is also an ongoing need for public services including transportation assistance, emergency housing and utility assistance, healthcare assistance, food assistance, home repairs, as well as case management services and other services for both homeless and non-homeless special needs populations including the elderly; frail elderly; persons with mental, physical, and/or developmental disabilities; persons with alcohol or other drug addiction; persons with HIV/AIDS and their families; and victims of domestic violence, sexual assault, dating violence, and stalking.

Overall, the priority needs listed in this 2019-2023 Consolidate Plan include: Housing (including acquisition for housing), Public Services, Public Infrastructure and Facility Improvement, Homeless Services, and Administration and Planning. The following summarizes the results from the 2019 Consolidated Plan Survey.

- **Housing** goals include acquisition of land/improvements to add affordable units and home repairs to preserve housing units.
- **Public Services** goals include supporting services that provide basic daily living needs such as housing and utility assistance, transportation assistance, food assistance, healthcare assistance, and case management services for non-homeless special needs households.

- **Public Infrastructure and Facility Improvement** goals include the creation of water and sewer lines, drainage projects, and public facility needs, which can include ADA accessibility, park renovations, a shelter for victims of domestic violence, mental healthcare facility, and a treatment facility for persons struggling with substance abuse
- **Homeless Services** goals include supporting services that provide basic daily living needs including transportation, food, clothing, home goods, and healthcare services, as well as case management services.
- **Administration and Planning** goals include supporting planning and monitoring efforts for the CDBG program.

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

- 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
- Meet a goal of this 2019-2023 Consolidated Plan

In making funding decisions, the Hamilton County CDBG program will give priority to activities that:

- Support, complement or are consistent with other current local unit of government plans;
- Address those populations with the greatest needs including the elderly, disabled, victims of domestic violence and the disenfranchised such as the homeless and the near homeless. The County will give priority to programs that provide services addressing the basic needs of our most at-risk populations;
- Are sustainable over time;
- Have demonstrated cooperation and collaboration among government, private nonprofit agencies and the private sector to maximize impacts and reduce administrative costs; and,
- Do not have a more appropriate source of funds.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

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
Lead Agency	HAMILTON COUNTY	
CDBG Administrator		Noblesville Housing Authority
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

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

Consolidated Plan Public Contact Information

The Noblesville Housing Authority is the administrator of the CDBG Program. Contact information is:
 CDBG Program
 Noblesville Housing Authority
 Attn: Christopher Allen, CDBG Coordinator
 320 Kings Lane
 Noblesville, IN 46060
 317-773-5110

PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

The NHA is responsible for the Consolidated Plan for the Hamilton County Urban County Entitlement area. The Noblesville Housing Authority hired a consulting firm, Novogradac and Company LLP, to assist with the public input process and writing of this Consolidated Plan. The Consolidated Plan was developed in consultation a wide variety of stakeholders and as well as members of the general public. Both The Hamilton County Area Neighborhood Development (HAND), Inc., a local non-profit affordable housing developer, and the NHA provided a preliminary contact list of potential stakeholders, and that list was then supplemented by contacts collected by Novogradac through referrals from contacted stakeholders as well as online research.

The planning process involved a combination of online surveys; stakeholder meetings with non-profit organizations, local housing providers, social service agencies, community and economic development organizations, government agencies, and members of the general public, multiple surveys; and, one-on-one consultations.

- First, in July 2018 six listening sessions were conducted across the county as part of the 2018 Hamilton County Housing Needs Assessment. A total of 74 individuals attended these meetings including elected officials, county and local government officials, business owners, developers, as well as representatives of nonprofit service providers, the chambers of commerce, and faith-based community, community organizers, media outlets, and members of the general public. A brief hard copy survey was distributed to attendees of these meetings for completion at the end of the listening session; 37 attendees completed the brief print survey.
- Second, in July 2018 a survey was created for stakeholders and members of the general public (anyone who lived or worked in Hamilton County) to complete to help identify housing needs and priorities. A snowball sampling design was employed whereby key stakeholders and attendees at the listening session were directly solicited with instructions to share the survey with professional and personal networks; the survey was also publicly advertised. In total 603 responses were received and retained (one survey response was dropped as more than half of the questions were left blank, which was an aberration relative to other responses). This survey is referred to as the 2018 Housing Needs Assessment Survey.
- Third, in May 2019 a survey was created for stakeholders and members of the general public to complete to help identify both countywide housing and non-housing community development needs and priorities. The survey was distributed at the Good Samaritan Network's 10th Annual Hamilton County Resource Fair to both resource providers at the fair as well as members of the general public in attendance, and was then subsequently emailed out to key stakeholders including, but not limited to, elected officials, county and local government officials, and nonprofit service providers. A total of 170 responses were received. This survey is referred to as the 2019 Consolidated Plan Survey.

- Fourth, four public meetings were held in 2019, two in April and two in July. The first and third meetings were public information meetings and a total of 51 people attended these meetings. The second and fourth meetings were public hearings held on April 12 and July 26. The first public hearing was held to discuss the Consolidated Plan and seek public input. A total of seven people attended this meeting including NHA staff. The second public hearing was held on July 26 to seek public comment on the draft Consolidated Plan. No public attended this meeting and no comments were received.
- Fifth, unlike the 2019 Consolidated Plan survey which was designed to solicit feedback on community-wide needs, one-on-one stakeholder consultations were conducted with key stakeholders to solicit input as to the needs of specific groups, particularly those with special needs.

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

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

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

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

- Nonprofit social, governmental and emergency agencies throughout Hamilton County

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

The GSN provides resources and support for critical human services to network service providers making them stronger and more effective; with a goal of uniting for the common good rather than duplicating efforts and competing for funding. Support for members include a phone chain for emergency needs among providers, capacity building such as procedures for client intake, reporting and emergency plan and an advocate for funding. The pathway through which the connections are made is through a membership based organizational model whereby membership in the organization provides access to GNET, the online system through which members can connect, communicate, collaborate, and coordinate. According to the GSN, the organization had five primary initiatives when developing the launch of GNET:

- Enhance our approach for connecting, collaborating, communicating and advocating and developing a simple and up to date approach utilizing desktop, online, and mobile access capabilities.
- Expand and fast-track the connections and communications across the network.
- Drive a common profile and reporting framework among the network.
- Weaving together results-driven information and databases to enable a more inclusive and improved search engine type approach.
- Directly integrating immediate access of relevant and current information that member agencies, organizations and individuals can use 24/7 – provided directly by them.

Currently the GSN network consists of 268 agencies (including the NHA), 280 churches, 43 food pantries, 69 schools, and five hospitals. The presence of the GSN network is an asset for Hamilton County as it facilitates better coordination and cooperation between government agencies and service providers and provides opportunities for future collaborative partnerships.

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

The Indiana Balance of State Continuum of Care (CoC) is the planning body for initiatives in ending homelessness in the State of Indiana. To do so, this group supports the development and ongoing maintenance of a strategic, comprehensive system to address homelessness. This includes strategies for engaging mainstream partnerships, the provision of shelter, temporary housing, services, and permanent housing. The components of a CoC system are outreach, intake, and assessment to identify an individual's or family's service and housing needs, and to link them to appropriate housing and/or

service resources such as emergency shelter and safe, decent alternatives to the streets; transitional housing with supportive services; and permanent supportive housing and permanent housing. The goal is to ensure that all residents of the State of Indiana are able to access and maintain permanent housing.

The Indiana Balance of State Continuum of Care includes 91 of the 92 counties in the state. These 91 counties are divided into 16 regions and each region is overseen by a regional planning council and chairperson. Hamilton County is part of Region 8 in the Indiana Balance of State CoC along with Boone, Hendricks, Madison, and Hancock Counties. The Region 8 CoC works with a variety of providers in Hamilton County including, but not limited to: GSN, Prevail, Township Trustee offices, Third Phase, Family Promise, Aspire Indiana, Community Corrections, and the Noblesville Housing Authority. While there are no specific CoC goals for the upcoming year, the CoC will continue to work with local service providers to address the needs of the homeless in the county.

Hamilton County does not receive Emergency Solutions Grant funding as an entitlement jurisdiction. Hamilton County is however able to apply for statewide funds through The Indiana Housing and Community Development Authority (IHCDA). For the past six years, Emergency Solutions Grant Rapid Rehousing and Homeless Prevention funds in Hamilton County are administered by Aspire Indiana, Inc., a private non-profit organization, in coordination with the CoC. Aspire Indiana, Inc. serves Hamilton, Boone, Hendricks, Madison, and Hancock Counties. According to the IHCDA, Aspire Indiana, Inc. was awarded \$75,000 in ESG funds in 2018 of which ten percent went towards Homeless Prevention. The percent of funds spent on Hamilton County residents versus residents of the other two counties was unavailable. The 2019 awards have not yet been announced.

Information and feedback from key stakeholders was solicited through a variety of vehicles including a review of organization documents (e.g. annual reports), participation in online surveys, and on-on-one consultations (in person, by phone, and/or by email). Through the consultation process, it became clear that not only do organizations participate in the larger collaborative efforts (GSN/CoC), but they also coordinate and collaborate with one another in smaller collaborative efforts. For example, the Hamilton County Home Repair Partnership is a collaborative effort to ensure that low and moderate income homeowners are able to continue living safely in their existing homes and to improve accessibility and efficiency of the homes.; the partnership includes HAND, a local non-profit developer, Habitat for Humanity of Hamilton County, Shepherd's Center of Hamilton County (a social service provider specializing in services for seniors), SERVE Noblesville, and Christmas in Action.

Consultations were conducted through a variety of approaches including surveys, interviews, and public meetings to understand the issues facing the development of programs and projects serving homeless neighbors. Feedback from these consultations was included in the Consolidated Plan.

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

Hamilton County does not receive Emergency Solutions Grant funding as an entitlement jurisdiction. Hamilton County is however able to apply for statewide funds through The Indiana Housing and Community Development Authority (IHCDA). According to IHCDA, Emergency Solutions Grant Rapid Rehousing and Homeless Prevention funds in Hamilton County are administered by Aspire Indiana, Inc., a private non-profit organization, in coordination with the CoC. Aspire Indiana, Inc. serves Hamilton, Boone, Hendricks, Madison, and Hancock Counties. According to the Indiana Housing and Community Development Authority, Aspire Indiana, Inc. was awarded \$75,000 in ESG funds in 2018 of which ten percent went towards Homeless Prevention. The percent of funds spent on Hamilton County residents versus residents of the other two counties was unavailable. The 2019 awards have not yet been announced.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Region 8 CoC
	Agency/Group/Organization Type	Services - Homeless Services-Persons with HIV/AIDS Services – Mental Illness
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in a stakeholder interview. Anticipated outcomes of the consultation is to provide input for the most critical needs of the community for the next planning years.
12	Agency/Group/Organization	Aspire Indiana, Inc.
	Agency/Group/Organization Type	Services - Homeless Services-Persons with HIV/AIDS Services – Mental Illness
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in both a stakeholder interview and 2019 Consolidated Plan survey. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
2	Agency/Group/Organization	Good Samaritan Network
	Agency/Group/Organization Type	Services – Housing/Utilizes Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-Homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Transportation Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in 2019 Consolidated Plan survey and a stakeholder interview. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
3	Agency/Group/Organization	Hamilton County Area Neighborhood Development, Inc. (HAND)
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Lead-based Paint Strategy Anti-Poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in 2018 Hamilton County Housing Needs Assessment survey, 2018 Hamilton County Stakeholder Meetings, 2019 Consolidated Plan survey, and 2019 stakeholder interview. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
4	Agency/Group/Organization	Noblesville Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs Housing Needs Assessment Market Analysis Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in 2018 Hamilton County Housing Needs Assessment survey, 2018 Hamilton County Stakeholder Meetings, 2019 Consolidated Plan survey, and a stakeholder interview. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
5	Agency/Group/Organization	Alternatives of Madison County, Inc.
	Agency/Group/Organization Type	Services - Homeless Services - Persons with HIV/AIDS Services – Mental Illness
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in 2019 Consolidated Plan survey and a stakeholder interview. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
6	Agency/Group/Organization	Habitat for Humanity Hamilton County
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in 2018 Hamilton County Housing Needs Assessment survey, 2018 Hamilton County Stakeholder Meetings, 2019 Consolidated Plan survey, and a stakeholder interview. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
7	Agency/Group/Organization	Hope Family Care Clinic
	Agency/Group/Organization Type	Services – Non-homeless special needs Services-Children Services-Elderly Persons Services-Homeless Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in both a stakeholder interview and 2019 Consolidated Plan survey. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
8	Agency/Group/Organization	Janus Developmental Services, Inc.
	Agency/Group/Organization Type	Services - Persons with Disabilities Services - Transportation
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in the 2018 Hamilton County Housing Needs Assessment survey, 2019 Consolidated Plan survey, and a stakeholder interview. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.

9	Agency/Group/Organization	Meals on Wheels of Hamilton County
	Agency/Group/Organization Type	Services - Children Services - Elderly Persons Services - Persons with Disabilities Services - Homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in both a stakeholder interview and 2019 Consolidated Plan survey. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
10	Agency/Group/Organization	City of Westfield
	Agency/Group/Organization Type	Other government - Local Planning organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Public Infrastructure Housing Needs Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives of various city agencies as well as elected officials were invited to participate in 2018 Hamilton County Housing Needs Assessment survey, 2018 Hamilton County Stakeholder Meetings, and the 2019 Consolidated Plan survey. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
11	Agency/Group/Organization	City of Noblesville
	Agency/Group/Organization Type	Other government - Local Planning organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Public Infrastructure Housing Needs Assessment Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives of various city agencies as well as elected officials were invited to participate in 2018 Hamilton County Housing Needs Assessment survey, 2018 Hamilton County Stakeholder Meetings, and the 2019 Consolidated Plan survey. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
12	Agency/Group/Organization	City of Fishers
	Agency/Group/Organization Type	Other government - Local Planning organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Public Infrastructure Housing Needs Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives of various city agencies as well as elected officials were invited to participate in 2018 Hamilton County Housing Needs Assessment survey, 2018 Hamilton County Stakeholder Meetings, and the 2019 Consolidated Plan survey. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
13	Agency/Group/Organization	City of Carmel
	Agency/Group/Organization Type	Other government - Local Planning organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Public Infrastructure Housing Needs Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives of various city agencies as well as elected officials were invited to participate in 2018 Hamilton County Housing Needs Assessment survey, 2018 Hamilton County Stakeholder Meetings, and the 2019 Consolidated Plan survey. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.

14	Agency/Group/Organization	Hamilton County Emergency Management
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Public Infrastructure Housing Needs Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Participated in 2019 Consolidated Plan survey. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
15	Agency/Group/Organization	Township Trustees: Adams, Clay, Delaware, Fall Creek, Jackson, Noblesville, Washington, Wayne, White River
	Agency/Group/Organization Type	Other government – Local
	What section of the Plan was addressed by Consultation?	Public Infrastructure Housing Needs Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Each Township Trustee was invited to participate in 2018 Hamilton County Housing Needs Assessment survey, 2018 Hamilton County Stakeholder Meetings, and the 2019 Consolidated Plan survey. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
16	Agency/Group/Organization	PrimeLife Enrichment
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Services - Elderly Persons Services - Persons with Disabilities
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in 2019 Consolidated Plan survey, and 2019 one-on-one email interview. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.

17	Agency/Group/Organization	The Salvation Army
	Agency/Group/Organization Type	Services – Housing & Utilities Services - Children Services - Homeless Services - Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy AFFH Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in 2019 Consolidated Plan survey, and a stakeholder interview. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
18	Agency/Group/Organization	Shepherd's Center of Hamilton County, Inc.
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Services - Elderly Persons Services - Persons with Disabilities Services - Transportation
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in 2018 Hamilton County Housing Needs Assessment survey, 2018 Hamilton County Stakeholder Meetings, 2019 Consolidated Plan survey, and a stakeholder interview. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
19	Agency/Group/Organization	Society of St. Vincent DePaul
	Agency/Group/Organization Type	Services – Housing/Utilities Services - Children Services - Homeless Services - Employment
	What section of the Plan was addressed by Consultation?	Homeless Anti-Poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in 2019 Consolidated Plan survey, and a stakeholder interview. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
20	Agency/Group/Organization	Trinity Free Clinic
	Agency/Group/Organization Type	Services – Non-homeless special needs Services-Children Services-Elderly Persons Services-Homeless Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in 2019 Consolidated Plan survey, and a stakeholder interview. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
21	Agency/Group/Organization	Family Promise of Hamilton County
	Agency/Group/Organization Type	Services – Homeless (individuals & families)
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in 2019 Consolidated Plan survey, and a stakeholder interview. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
22	Agency/Group/Organization	Hamilton County Kids Count
	Agency/Group/Organization Type	Services – Children
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in 2019 Consolidated Plan survey. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
23	Agency/Group/Organization	Sheridan Youth Assistance
	Agency/Group/Organization Type	Services – Children
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in 2019 Consolidated Plan survey. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
24	Agency/Group/Organization	Trinity Free Clinic
	Agency/Group/Organization Type	Services-Health Services – Non-homeless special needs Services-Children Services-Elderly Persons Services-Homeless
	What section of the Plan was addressed by Consultation?	Needs Assessment Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in both a stakeholder interview and 2019 Consolidated Plan survey. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.
25	Agency/Group/Organization	InteCare Supportive Services for Veteran Families (SSVF)
	Agency/Group/Organization Type	Services-Veterans Services – Non-homeless special needs
	What section of the Plan was addressed by Consultation?	Needs Assessment Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency was invited to participate in a stakeholder interview. Anticipated outcome of the consultation is to provide input for the most critical needs of the community for the next planning years.

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

The NHA and Novogradac attempted to contact all relevant stakeholders and while no groups were purposively excluded, scheduling conflicts and time limits to complete the Consolidated Plan may have prevented some consultations. Additional consultations may be conducted during the 30-day comment period and will be added to this draft document as applicable.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Indiana – Balance of State	The goals of the CoC are reflected in this Consolidated Plan.
Housing Needs Assessment	HAND	A countywide Housing Needs Assessment was conducted by HAND in consultation with Novogradac & Company LLP in the summer of 2018. The findings and recommendations in that report are reflected in this Consolidated Plan.
2016 Analysis of Impediments to Fair Housing	City Consultants and Research, LLC	The findings and recommendations of the Analysis of Impediments to Fair Housing are reflected in this Consolidated Plan.
Title VI of the Civil Rights Act of 1964, Voluntary Compliance Agreement Between The United States Department of Housing and Urban Development and Hamilton County	Hamilton County	The terms of the voluntary compliance agreement between the county and HUD are reflected in this Consolidated Plan.
Title VI of the Civil Rights Act of 1964, Voluntary Compliance Agreement Between The United States Department of Housing and Urban Development and The City of Noblesville, Indiana	City of Noblesville / Hamilton County	The terms of the voluntary compliance agreement between the city and HUD are reflected in this Consolidated Plan.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Aspire Indiana Health Community Needs Assessment 2019	Aspire Indiana Health, Inc.	The plan was prepared in 2019 to identify the leading health needs in Boone, Hamilton, and Madison counties as well as Pike and Washington Townships in Marion County and to make recommendations regarding implementation strategies to help address those needs. The results of this plan are reflected in this Consolidated Plan.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The Hamilton County urban county entitlement area is comprised of four cities together with the county. Representatives from all four cities were invited to participate in the planning process through several outlets including the following: invitations to the stakeholder listening sessions conducted in 2018 including one in each of the four cities; invitations to participate in two online surveys including one in 2018 specific to housing needs and a second in 2019 which addressed both housing and non-housing community development needs; invitations for one-on-one consultations with representatives of the various government divisions of each city throughout 2018 and 2019; and finally, invitations to the public meetings in 2019 specifically for the Consolidated Plan. Further, the NHA is currently in discussions with the Hamilton County Commissioners to increase the coordination and minimize duplication between the CDBG program and the discretionary social service portion of the county commissioners’ fund.

PR-15 Citizen Participation

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

Traditional modes of public participation have not been successful in the past in Hamilton County. Hamilton County is very large in area and only a few cities participate in the CDBG collaborations. It is also challenging to reach the households this funding is intended to serve. As a result, in addition to the traditional public meetings, Hamilton County has employed additional approaches in an attempt to collect additional public input. For example, public input was solicited through a variety of consultation approaches including six listening sessions open to invited stakeholders as well as the general public for the 2018 Housing Needs Assessment, the 2018 Housing Needs Assessment survey, five meetings in 2019 of the Good Samaritan Network, two public meetings in the spring/summer of 2019 for the Consolidated Plan (one before the draft plan was released and one during the public comment period), and a 2019 Consolidated Plan survey.

Citizen Participation Outreach

#	Date	Event	Location	Mode of Outreach (public meeting, newspaper ad, other)	Target of Outreach (minorities, non-English speaking (specify language), persons with disabilities, non-targeted/broad community/residents of public and assisted housing, other)	Attendance	Summary of Information Presented	Summary of comments received	Summary of comments not accepted and explanation if applicable	URL (if applicable)
1	July 9 - 13, 2018	Six Stakeholder & Public Listening Sessions	Arcadia, Sheridan, Fishers, Noblesville, Westfield, and Carmel	Elected officials, county and local government officials, business owners, developers, representatives of nonprofit service providers, the chambers of commerce, faith-based community, community organizers, media outlets, and members of the general public	Key stakeholders and the general public	74 individuals attended the meetings to provide input.	Presented information about the goal for the 2018 Housing Needs Assessment and its intended purposes.	Discussions revolved in large part around the relationship between economic development and affordable housing, noting in particular that without affordable housing economic growth in the county will be limited. Access to homeownership and the stigma associated with affordable housing were also discussed.	All comments were accepted.	
2	July 9 - 13, 2018	Print Survey distributed to attendees of six Stakeholder & Public Listening Sessions	Arcadia, Sheridan, Fishers, Noblesville, Westfield, and Carmel	Distributed print survey to attendees of the six stakeholder and public listening sessions	Attendees of the six stakeholder and public listening sessions	37 responses	N/A	64 percent of respondents identified affordable housing as the number one priority housing need in the community; diversification of the housing stock was the second most common need. Northern communities also identified home repairs and blighted property as a need.	All comments were accepted.	

3	July 15 - August 12, 2018	2018 Hamilton County Housing Needs Assessment Survey	County-wide	Distributed to email list of stakeholders and attendees of the public listening sessions and requested that each person distribute to his/her network; posted on HAND's website; advertised in local media; hard copies distributed at public library for residents of northern communities who may lack access to WIFI.	Key stakeholders and the general public	603 responses	N/A	Affordability is the most common barrier to homeownership throughout the county, with over 75 percent of respondents in all places selecting affordability as a barrier to homeownership. The ability to come up with a downpayment was also a large burden according to residents of Sheridan and Arcadia, as was the ability to secure financing according to residents of Sheridan. Within the county, while residents of Atlanta, Cicero, and Sheridan were most likely to choose housing affordability as the reason for choosing the housing in which he/she currently resides, residents of Carmel, Fishers, and Westfield were most likely to choose close to a good school, and residents of Noblesville and Atlanta were most likely to choose housing features.	One survey response was not retained as the respondent left more than half of the survey blank which was a significant aberration from other responses
4	May 10, 2019 - May 31, 2019	2019 Consolidated Plan Survey	County-wide	Distributed at 2019 Resource Fair as well as via email to list of key stakeholders.	Key stakeholders and the general public (particularly low to moderate income households attending the Resource Fair)	170 Responses	N/A	Respondents agreed that affordable housing is the top need in the county followed by addressing homelessness and then public facilities and infrastructure. Of housing needs, emergency rental assistance, and emergency utility assistance were most likely to be identified as a high priority. Of homeless needs, an emergency shelter and domestic violence shelter were most likely to be identified as a high priority. Of public facility needs, a mental healthcare facility and substance abuse treatment facility were most likely to be identified as a high priority. Of services, transportation assistance, mental health services, substance abuse treatment services, and domestic violence services were most likely to be identified as a high priority	All comments were accepted.
5	2/12/2019	Good Samaritan Network Monthly Meeting	Hamilton County 4-H Fairgrounds Annex Building 2003 Pleasant St, Noblesville, IN 46060	Email notice by GSN	Non-targeted/broad community	Approximately 15	Presented information about the CDBG Program and the Consolidated Plan. Presented information on the timeline for the Consolidated Plan and the timeline for the CDBG Application process.	Basic questions received regarding the CDBG program. Questions included who is eligible to apply and what times of activities are eligible for funding. All questions were answered.	None
6	3/12/2019	Good Samaritan Network Monthly Meeting	Hamilton County 4-H Fairgrounds Annex Building 2003 Pleasant St, Noblesville, IN 46060	Email notice by GSN	Non-targeted/broad community	Approximately 15	Presented information about the CDBG Program and the Consolidated Plan. Presented information on the timeline for the Consolidated Plan and the timeline for the CDBG Application process. Presented update on the Pre-Application process and upcoming due dates in April as well as upcoming meetings in April.	Basic questions received regarding the CDBG program. Questions included who is eligible to apply and what times of activities are eligible for funding. All questions were answered.	None
7	4/8/2019	Hamilton County Commissioners Regular Meeting	1 Hamilton County Square Suite 157 Noblesville, IN 46060	Announcement at Good Samaritan meeting, County Commissioners public notice process.	Non-targeted/broad community	Approximately 15	Presented information about the CDBG Program and the Consolidated Plan. Presented information on the timeline for the Consolidated Plan and the timeline for the CDBG Application process. Presented update on the Pre-Application and Application process and upcoming due dates in April and May as well as upcoming meetings in April.	The Hamilton County Commissioners asked about the status of specific projects. Updates for requested projects were given.	None
8	4/9/2019	1st CDBG Public Information Meeting	Hamilton County 4-H Fairgrounds Annex Building 2003 Pleasant St, Noblesville, IN 46060	Email notice by GSN. Announcement at Good Samaritan meeting, announcement at County Commissioners meeting.	Non-targeted/broad community	16	Presented information about the CDBG Program and the Consolidated Plan. Presented information on the timeline for the Consolidated Plan and the Action Plan and the timeline for the CDBG Application process. Presented update on the Pre-Application and Application process and upcoming due dates in April and May as well as upcoming meetings in April.	Basic questions received regarding the location and nature of the Public Hearing to be held on April 12. All questions were answered.	None
9	4/12/2019	1st CDBG Public Hearing	Hamilton County 4-H Fairgrounds Conference Rm 2003 Pleasant St, Noblesville, IN 46060	Public Notice in The Times of Noblesville and the Hamilton County Reporter (newspapers), announcement at GSN meeting on 3/12/19	Non-targeted/broad community	5	Presented information about the Hamilton County CDBG Program and the Consolidated Plan. Presented information about the Consolidated Plan and Action Plan process. Took questions and comments from the public.	Two citizens attend and gave the following comments. Jennifer Gallager and Melissa Meeks, both of Westfield, IN. Both expressed concern that a Mr. Gavin Newsom has been suing several cities including Westchester County, NY for not affirmatively furthering fair housing. They expressed concern that the results of these cases means that HUD is now able to overrule local zoning	None

10	4/22/2019	Hamilton County Commissioners Regular Meeting	1 Hamilton County Square Suite 157 Noblesville, IN 46060	Announcement at Good Samaritan meeting, County Commissioners public notice process.	Non-targeted/broad community	Approximately 15	Presented an update on the CDBG Program as well as an update on the Consolidated Plan and Action Plan process. Presented information about the Pre Applications that had been received and the projects that are being proposed for funding. Discussed with the Commissioners areas of need in the community.	Commissioners expressed concern that no organization had applied for any activity or project centered around transportation needs. The Commissioners stated that they have heard repeatedly that transportation services are an ever increasing and important need in the community. The Commissioners also stated that they wished to see the CDBG Program and the grant dollars Hamilton County awards to different organizations yearly work more closely.	None	
11	5/10/2019	Hamilton County Resource Fair	Hamilton County 4-H Fairgrounds 2003 Pleasant St, Noblesville, IN 46060	Email notice by GSN, Announcement at Good Samaritan meeting, announcement at County Commissioners meeting.	Non-targeted/broad community	Approximately 350	Presented and distributed information about the CDBG Program and about Fair Housing at the Hamilton County Resource Fair. Handed out surveys and brochures to those in attendance as well as to vendors.	Basic questions received regarding the CDBG program. Questions included who is eligible to apply and what times of activities are eligible for funding. All questions were answered.	None	
12	5/13/2019	Hamilton County Commissioners Regular Meeting	1 Hamilton County Square Suite 157 Noblesville, IN 46060	Announcement at Good Samaritan meeting, County Commissioners public notice process.	Non-targeted/broad community	Approximately 15	Presented an update on the CDBG Program as well as an update on the Consolidated Plan and Action Plan process. Presented information about the organizations that had applied for funding and the different activities and project requests. Discussed the needs and funding priorities of the old Consolidated Plan and what the new needs and priorities of the community may be.	Commissioners accepted the list of organizations that had applied for funding to be taken under review. The Commissioners stated and agreed that funding needs and priorities should center on affordable housing and transportation wherever possible.	None	
13	5/14/2019	Good Samaritan Network Monthly Meeting	Hamilton County 4-H Fairgrounds Annex Building	Email notice by GSN	Non-targeted/broad community	Approximately 15	Presented information about the CDBG Program and the Consolidated Plan planning process. Presented information on the timeline for the Consolidated Plan.	Questions were asked about the Consolidated Plan and CDBG program. All questions were answered. No comments were made or submitted.	None	
14	5/20/2019	Meeting with HAND and Shepherd Center	NHA Office 320 Kings Ln Noblesville, IN 46060	Stakeholder meeting	Community Stakeholder, Affordable housing provider	4	Met with the Executive Directors of the Shepherd's Center and HAND to discuss the Consolidated Plan planning process, the CDBG program, and affordable housing in Hamilton County. Sought information regarding past and current CDBG projects involving both agencies and plans for future projects. Answered questions regarding the Consolidated Plan and the CDBG program	Questions were asked about the Consolidated Plan and CDBG program. All questions were answered. No comments were made or submitted.	None	
15	5/20/2019	Meeting with Noblesville Deputy Mayor, Steve Cooke	16 S 10th St, Noblesville, IN 46060	Community Leader	Community Leader/Broad Community	3	Met with Deputy Mayor of Noblesville Steve Cooke and discussed the Consolidated Plan planning process and the CDBG program. Discussed affordable housing and fair housing issues as well. Answered questions regarding the Consolidated Plan and CDBG program.	Questions were asked about Consolidated Plan planning process and the CDBG program in general. All questions were answered. No comments were made or submitted.	None	
16	5/21/2019	Hamilton County Executive Directors Meeting	Hamilton County 4-H Fairgrounds Conference Rm 2003 Pleasant St, Noblesville, IN 46060	Stakeholder meeting	Community Stakeholder Meeting	11	Presented information about the CDBG Program and the Consolidated Plan planning process to Executive Directors of local Hamilton County non-profits and social service agencies. Presented information on the timeline for the Consolidated Plan and answered questions regarding the Consolidated Plan and the CDBG program.	Questions were asked about Consolidated Plan planning process and the CDBG program in general. All questions were answered. No comments were made or submitted.	None	
17	5/27/2019	Hamilton County Commissioners Regular Meeting	1 Hamilton County Square Suite 157 Noblesville, IN 46060	Announcement at Good Samaritan meeting, County Commissioners public notice process.	Non-targeted/broad community	Approximately 15	Presented an update on the CDBG Program as well as an update on the Consolidated Plan and Action Plan process. Presented additional information about the organizations that had applied for funding and the different activities and project requests. Presented ways in which transportation priorities may be funded.	None.	None	
18	5/30/2019	Meeting with Habitat for Humanity	NHA Office 320 Kings Ln Noblesville, IN 46060	Stakeholder meeting	Community Stakeholder, Affordable housing provider	4	Met with with representatives of Habitat for Humanity of Hamilton County and Habitat for Humanity of Greater Indianapolis. Discussed the Consolidated Plan planning process and the timeline for the Consolidated Plan. Sought information regarding past and current CDBG projects involving Habitat and plans for future projects. Answered questions regarding the Consolidated Plan and the CDBG program.	Questions were asked about the Consolidated Plan and CDBG program. All questions were answered. No comments were made or submitted.	None	

19	6/10/2019	Hamilton County Commissioners Regular Meeting	1 Hamilton County Square Suite 157 Noblesville, IN 46060	Announcement at Good Samaritan meeting, County Commissioners public notice process.	Non-targeted/broad community	Approximately 15	Presented an update on the CDBG Program and activities to the Commissioners and an update on the status of the Consolidated Plan and Action Plan. Presented the preliminary CDBG budget and recommendations for funding to the County Commissioners for their review. Discussed areas of priority and need with the Commissioners and ways in which the CDBG program could address those needs.	None.	None	
20	6/11/2019	Region 8 Homeless Planning Council Meeting	9615 East 148th Street, Suite 1, Noblesville, IN 46060	Stakeholder meeting	Community Stakeholders, CoC	Approximately 15	Presented information about the CDBG Program and the Consolidated Plan. Presented information on the timeline for the Consolidated Plan.	None.	None	
21	6/11/2019	Good Samaritan Network Monthly Meeting	Hamilton County 4-H Fairgrounds Annex Building 2003 Pleasant St, Noblesville, IN 46060	Email notice by GSN	Non-targeted/broad community	Approximately 15	Presented information about the CDBG Program and the Consolidated Plan. Presented information on the timeline for the Consolidated Plan.		None	
22	6/24/2019	Hamilton County Commissioners Regular Meeting	1 Hamilton County Square Suite 157 Noblesville, IN 46060	Announcement at Good Samaritan meeting, County Commissioners public notice process.	Non-targeted/broad community	Approximately 15	Presented the CDBG budget and recommendations for funding to the County commissioners for their final review and approval.	None.	None	
23	7/9/2019	Good Samaritan Network Monthly Meeting/Consolidated Plan Public Presentation	Hamilton County 4-H Fairgrounds Annex Building 2003 Pleasant St, Noblesville, IN 46060	Email notice by GSN, Announcement at Good Samaritan meeting, announcement at County Commissioners meeting.	Non-targeted/broad community	Approximately 30	Novogradac & Company LLC presented the findings of the Consolidated Plan and took audience questions.	Questions were asked about the findings of the plan and the methods used to formulate the plan. All questions were answered. No comments were made or submitted regarding the Consolidated Plan itself.	None	
24	7/26/2019	2nd CDBG Public Hearing	Hamilton County 4-H Fairgrounds Conference Rm 2003 Pleasant St, Noblesville, IN 46060	Email notice by GSN, Announcement at Good Samaritan meeting, announcement at County Commissioners meeting, public notice process.	Non-targeted/broad community	1	NHA staff were prepared to present the findings of the Consolidated Plan and take audience questions and public comments. No public attended this event.	None.	None	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Hamilton County is in central Indiana in the Indianapolis-Carmel-Anderson Metropolitan Statistical Area (MSA). The MSA consists of a total of 11 counties: Marion, Hamilton, Hendricks, Johnson, Madison, Hancock, Morgan, Boone, Shelby, Putnam, and Brown. Marion County is the most populated county within the MSA and is home to the anchor city, Indianapolis; Hamilton County is the second most populated county within the MSA. Marion County and Indianapolis are located immediately south of Hamilton County. Hamilton County is, however, the fastest growing county within the MSA (and the state) with a reported population increase of 20.2 percent since 2010, compared to 3.1 percent in Indiana as a whole and this growth is projected to continue through 2050.

Hamilton County contains four cities (Carmel, Fishers, Noblesville, and Westfield), four towns (Arcadia, Atlanta, Cicero, and Sheridan) as well as unincorporated areas and covers approximately 402 square miles. Noblesville is the county seat and is fairly centrally located within the county. All four of the cities are located in the southern half of the county, serving as suburbs to Indianapolis, while the towns are located in the northern half of the county and remain relatively rural; this is consistent with typical patterns of development given that the original principal city of the area, Indianapolis, is located south of Hamilton County.

In addition to being the fastest growing county in the state, Hamilton County is also the wealthiest and the most well educated, has the highest health ranking, and the lowest poverty rate and community distress score in the state. According to the most recent data available from the ACS, Stats Indiana, and Aspire Indiana Health Community Needs Assessment, Hamilton County is characterized as follows:

- Fourth largest county in the state (ranked 4th out of 92 counties)
- Fastest growing county in the state since 2010 Census (20.7 percent)
- Highest per capita personal income (\$71,377)
- Highest median household income (\$95,080)
- Most well educated (96.2 percent have high school diploma or more; 57.5 percent have bachelor's degree or more)
- Lowest poverty rate (3.8 percent)
- First in health factors and outcomes
- Lowest community distress score
- One of the highest average wage per job for covered employment (\$53,961; ranked 5th)
- One of the lowest unemployment rates (2.7 percent; ranked 81st)

- Despite being primarily White (87.4 percent are White alone, ranked 4th), the county also has the second largest Asian population (5.8 percent), seventh largest Black/African American population (3.6 percent), and eighth largest Hispanic or Latino population (3.8 percent)

These facts make it difficult to imagine any part of the population in Hamilton County may be struggling to make ends meet, either because of lack of affordable housing, low income or unemployment, or the lack of connection to social services/resources. Despite all of Hamilton County's successes, there are still a large number of individuals and households in the county that are disadvantaged and underserved. While many of these households have special needs (services and facilities), other needs (housing, transportation, and infrastructure improvements) transcend group characteristics and are considered community-wide needs. This fact is evident in the county health rankings which rank counties on four categories of health factors: health behaviors (tobacco use, diet & exercise, alcohol and drug use, sexual activity), clinical care (access to care, quality of care), social and economic factors (education, employment, income, family & social support, community safety), and the physical environment (air & water quality, housing and transit). Overall, Hamilton County ranks first in the state. Hamilton County also ranks first in health behaviors and clinical care and third in terms of social and economic factors. The only outlier is Hamilton County's ranking in terms of the physical environment where Hamilton County ranks 18th. This is driven in large part by housing and transportation issues in the county.

Hamilton County has the highest median home value (\$266,500) in the state and the value has increased significantly over the past ten years whereas the median household income has remained relatively stagnant. The average median home value from 2008 to 2012 was \$214,400 compared to \$240,000 from 2013 to 2017, a statistically significant increase. Meanwhile the average median household income from 2008 to 2012 was \$90,647 compared to \$90,582 from 2013 to 2017. Additionally, in recent years, however there has been an increased recognition that transportation costs, which oftentimes account for the second largest expenditure in a household budget, play a significant role in the overall affordability of housing. As a result, researchers and planners alike have started to focus more on the combined impact of housing and transportation costs on household budgets to determine the affordability of communities. In places that are dominated by commuters and where public transportation is limited, transportation costs are oftentimes even more significant in terms of their impact on a household budget. According to the Center for Neighborhood Technology, as cited in the 2018 Housing Needs Assessment, on average, Hamilton County households spend 35 percent of household income on housing and 26 percent of household income on transportation, or 61 percent combined. The average for the Indianapolis-Carmel Anderson MSA is 25 percent on housing and 25 percent on transportation, or 50 percent on housing and transportation combined. Hamilton County has a significantly larger percentage of cost burdened households and the majority of this trend is driven by high housing costs.

Needs and priorities throughout this Consolidated Plan were identified using the following methodology:

1. Identify group characteristics and general needs

2. Identify available resources
3. Identify general gaps in terms of needs
4. Identify specific gaps for particular groups/investment areas

The consultation process informed each of the aforementioned steps in the creation of the Consolidated Plan.

The majority of the tables for this document are provided to Hamilton County through the U.S. Department of Housing and Urban Development reporting system, IDIS. Much of the data in these tables is somewhat dated, coming from the 2011-2015 American Community Survey (ACS). Following HUD's lead, we have relied on the data provided through the IDIS system. Additionally, the tables summarize Hamilton County as a whole unit, listing all of the households in the wealthy cities as well as in the less affluent, surrounding communities. The challenge when addressing the needs in Hamilton County is providing services and addressing affordable housing where the households in need are located. Where necessary and appropriate, we have supplemented HUD's provided data with more recent data in the narrative of this document.

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

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	274,569	286,960	5%
Households	91,837	104,435	14%
Median Income	\$82,088.00	\$86,222.00	5%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

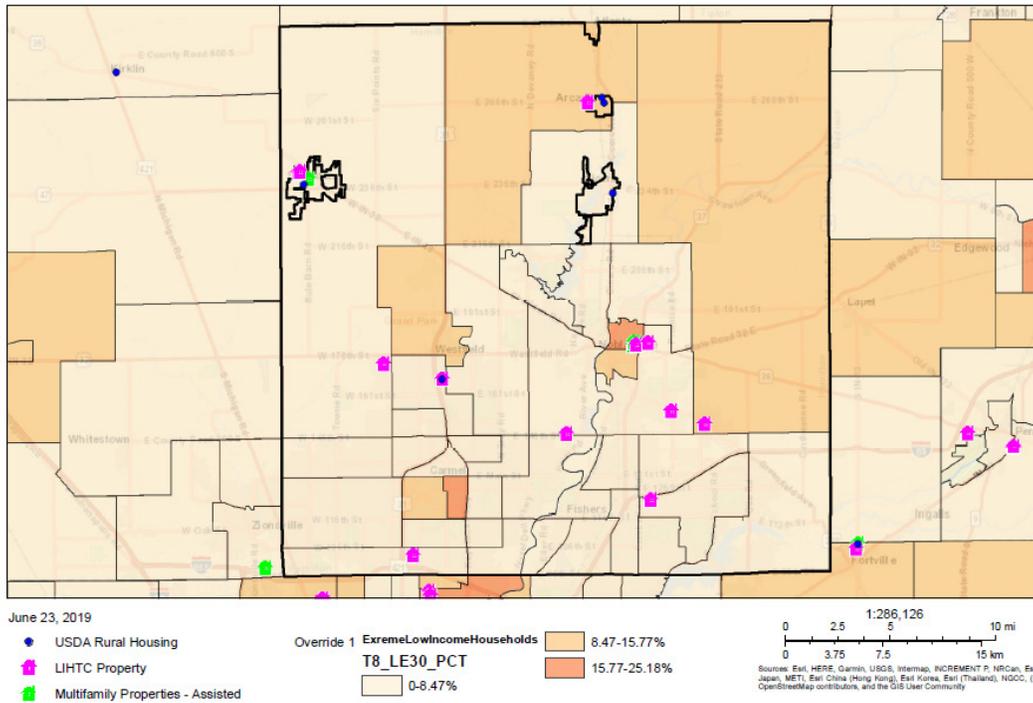
For the purposes of this Consolidated Plan, we will define extremely low-income (ELI) households are defined as households with incomes equal to or below 30 percent of AMI; very low-income households (VLI) are defined as households with incomes above 30 but equal to or below 50 percent of AMI; low-income (LI) households are households with incomes above 50 but equal to or below 80 percent of AMI; moderate-income (MI) households with incomes above 80 but equal to or below 100 percent of AMI; and middle- and upper-income households with incomes above 100 percent.

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	4,965	6,455	13,015	8,915	71,095
Small Family Households	1,695	1,815	4,750	3,945	42,975
Large Family Households	305	395	1,025	890	7,780
Household contains at least one person 62-74 years of age	570	1,365	2,340	1,470	10,075
Household contains at least one person age 75 or older	770	1,445	1,995	735	2,595
Households with one or more children 6 years old or younger	1,049	850	2,230	1,832	14,653

Table 6 - Total Households Table

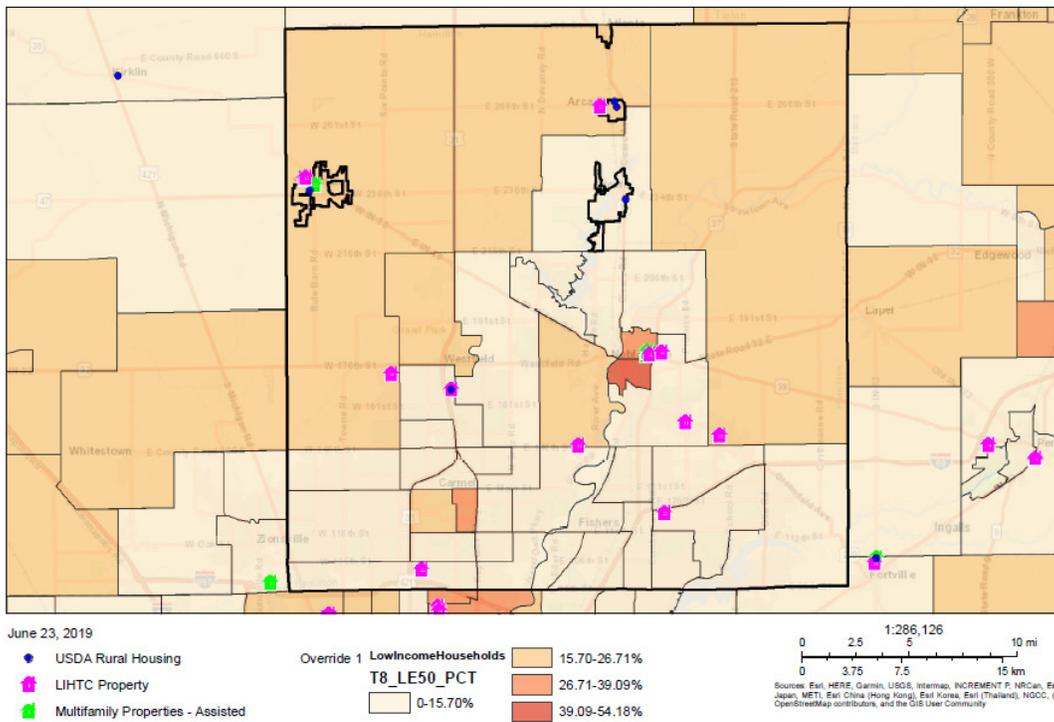
Data Source: 2011-2015 CHAS

CPD Maps - Percent Extremely Low Income Households



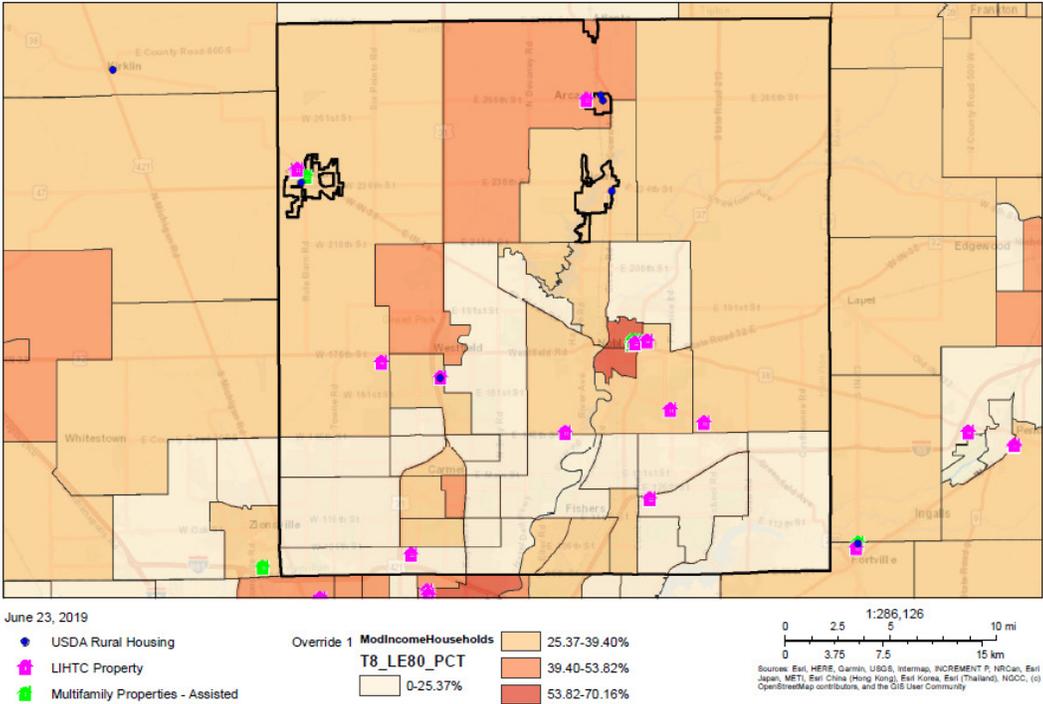
Source: HUD, CPD Maps, June 2019

CPD Maps - Percent Low Income Households



Source: HUD, CPD Maps, June 2019

CPD Maps - Percent Moderate Income Households



Source: HUD, CPD Maps, June 2019

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	100	55	15	20	190	15	25	20	0	60
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	90	10	0	10	110	0	0	15	10	25
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	110	15	90	35	250	0	20	30	75	125
Housing cost burden greater than 50% of income (and none of the above problems)	1,590	1,320	305	0	3,215	1,320	1,410	1,105	245	4,080
Housing cost burden greater than 30% of income (and none of the above problems)	330	1,105	2,130	485	4,050	235	975	2,730	1,644	5,584

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	300	0	0	0	300	435	0	0	0	435

Table 7 – Housing Problems Table

Data 2011-2015 CHAS

Source:

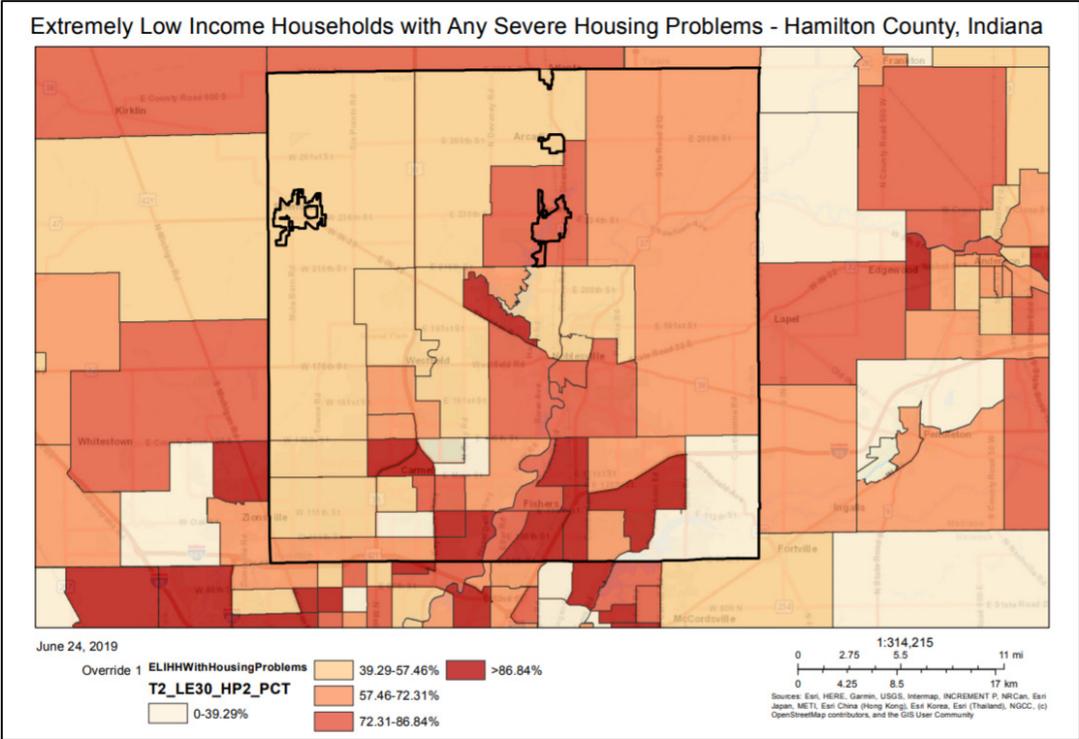
2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,895	1,400	405	65	3,765	1,335	1,455	1,180	330	4,300
Having none of four housing problems	559	1,444	4,420	2,365	8,788	434	2,165	7,005	6,155	15,759
Household has negative income, but none of the other housing problems	300	0	0	0	300	435	0	0	0	435

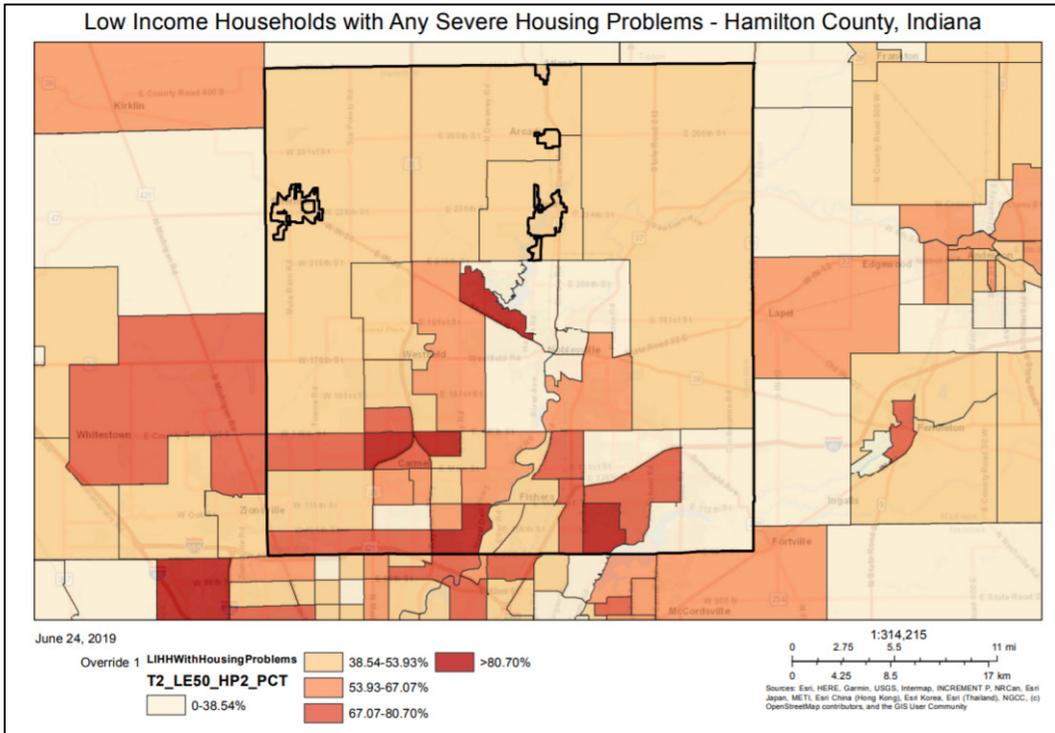
Table 8 – Housing Problems 2

Data 2011-2015 CHAS

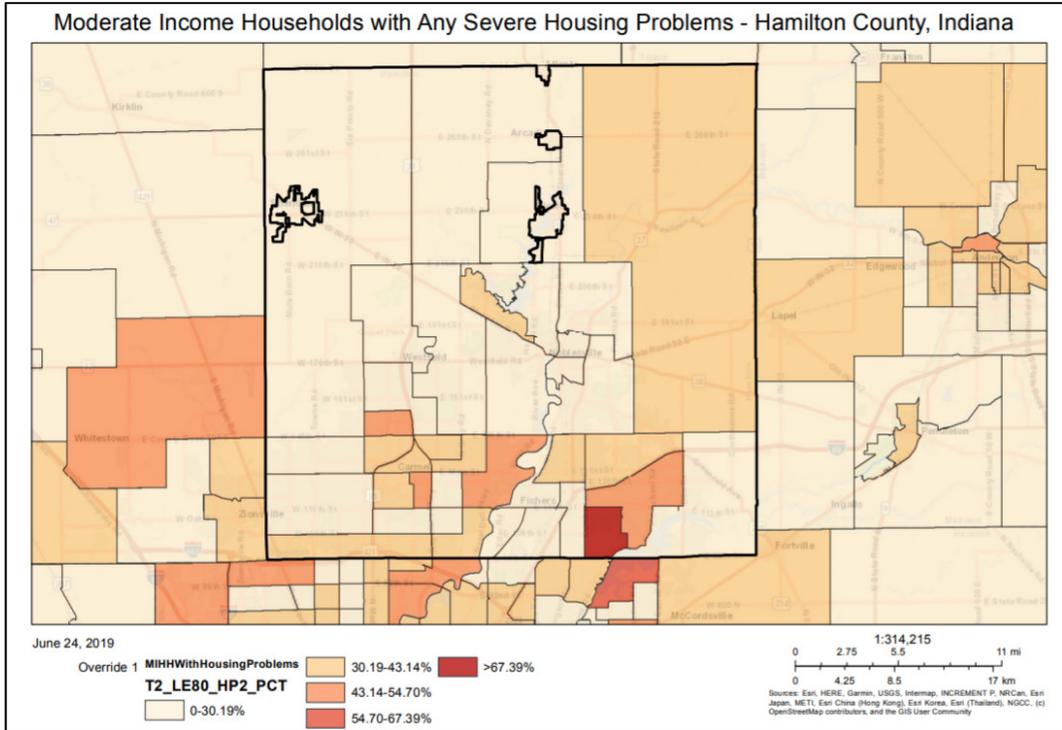
Source:



Source: HUD, CPD Maps, June 2019



Source: HUD, CPD Maps, June 2019



Source: HUD, CPD Maps, June 2019

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	760	835	890	2,485	565	629	1,450	2,644
Large Related	190	120	145	455	95	214	335	644
Elderly	490	555	335	1,380	444	1,060	1,113	2,617
Other	775	1,005	1,115	2,895	475	490	925	1,890
Total need by income	2,215	2,515	2,485	7,215	1,579	2,393	3,823	7,795

Table 9 – Cost Burden > 30%

Data 2011-2015 CHAS
Source:

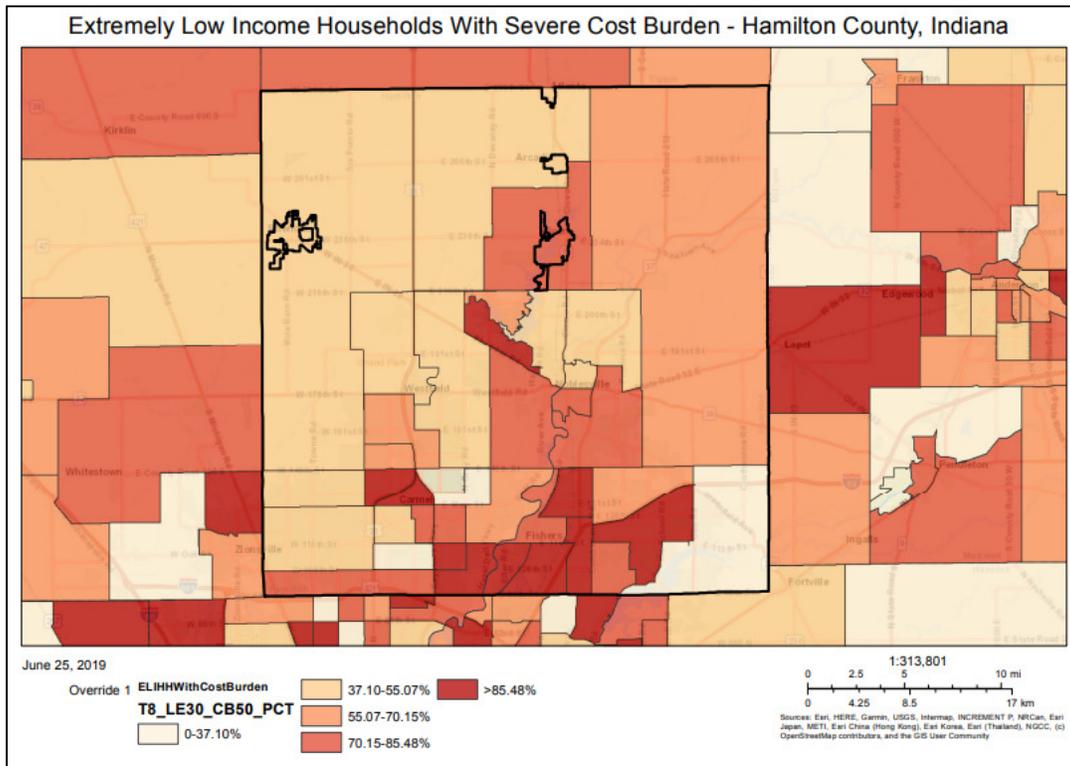
4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	590	310	110	1,010	480	405	195	1,080

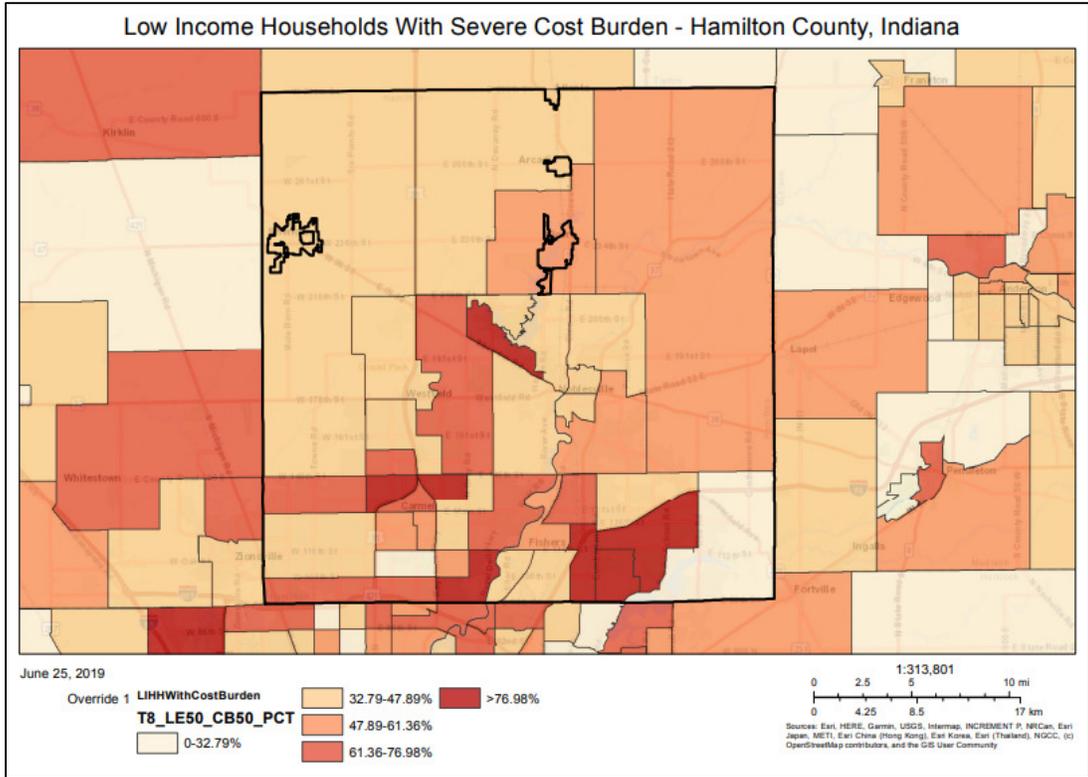
	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Large Related	175	50	55	280	95	120	10	225
Elderly	405	315	55	775	305	510	324	1,139
Other	715	700	85	1,500	455	370	580	1,405
Total need by income	1,885	1,375	305	3,565	1,335	1,405	1,109	3,849

Table 10 – Cost Burden > 50%

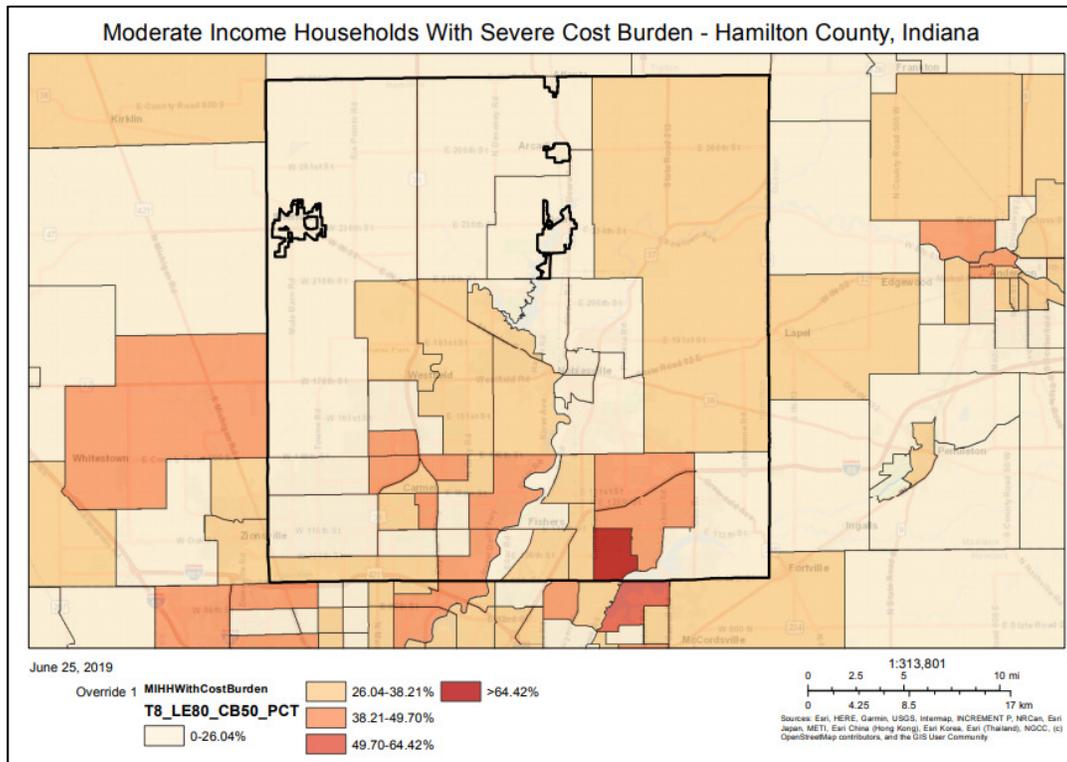
Data 2011-2015 CHAS
Source:



Source: HUD, CPD Maps, June 2019



Source: HUD, CPD Maps, June 2019



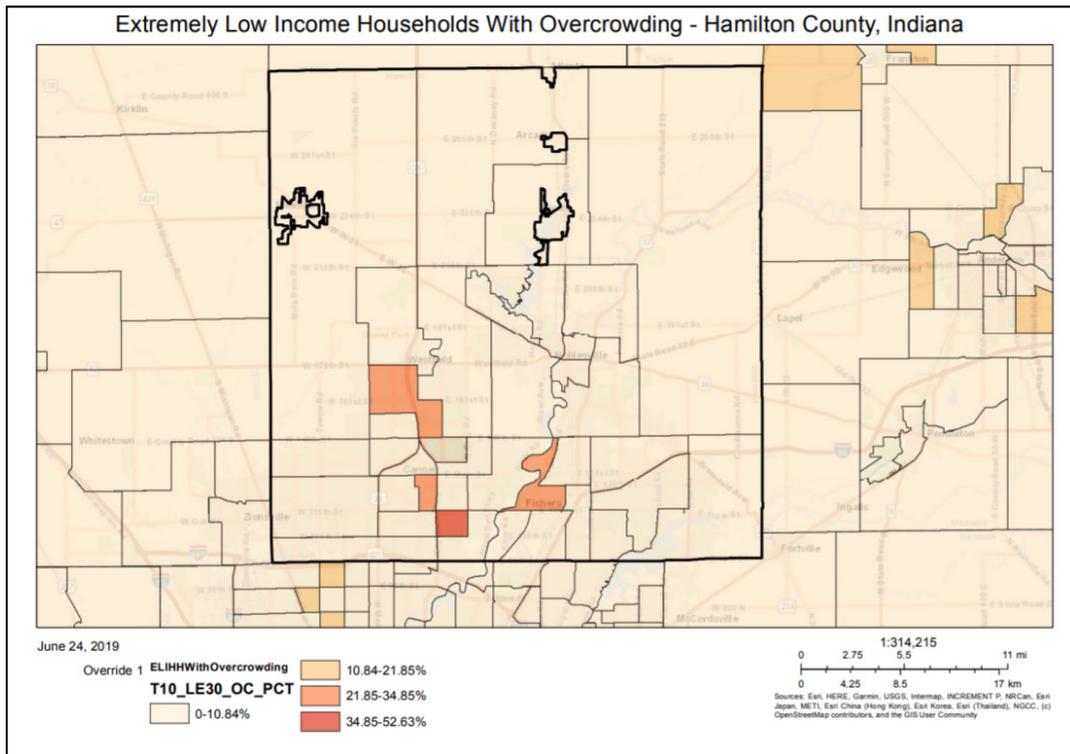
Source: HUD, CPD Maps, June 2019

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	200	25	90	35	350	0	0	30	85	115
Multiple, unrelated family households	0	0	0	10	10	0	20	15	0	35
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	200	25	90	45	360	0	20	45	85	150

Table 11 – Crowding Information – 1/2

Data 2011-2015 CHAS
Source:



Source: HUD, CPD Maps, June 2019

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

Note: HUD did not provide data for the above table - households with children by AMI income level and/or tenure.

Describe the number and type of single person households in need of housing assistance.

According to the 2017 American Community Survey, there were 118,666 households in Hamilton County. Of those, approximately 25,107 households (21.2 percent) were one-person households. Additionally, of all one-person households, approximately 33 percent are seniors and of all senior households 37 percent are one-person households. While the majority of one-person households are owner-households (58 percent), one-person households are also more likely to be renter-households than two or more-person households. For example, 70 percent one-person senior households ages 65 to 74 and 64 percent of one-person senior households ages 75 and over are owner-households compared to 98 and 88 percent of two-or-more person senior households ages 65 to 74 and 75 and over, respectively. Given that approximately a third of Hamilton County’s one-person households were seniors, it is reasonable to assume that at least some, if not many, of these households will have needs above and beyond those of a general single-person household. Additionally, many seniors live on fixed incomes and according to the 2017 ACS, the median household income of senior households in Hamilton County (\$57,675), while higher than that of the state (\$40,010) and the nation (\$43,735), is proportionally less (62 percent) than that of the state (74 percent) and nation (72 percent) when compared to the overall median household income in the county, a result of the overall high median household income in Hamilton County. This data is consistent with information collected through the consultation process whereby the rising cost of living in the county was reportedly a burden for many senior households. Overall, seniors need quality, affordable housing options to downsize and transition into as their household size and ability to maintain a larger home decreases. Additionally, younger one-person households, many of whom are likely to have student loan debts, will likely require assistance to access homeownership in the county as prices continue to rise.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

According to the 2017 ACS, approximately 8.9 percent of the total civilian noninstitutionalized population in Hamilton County has a disability; this is less than the state (13.9 percent) and nation (12.7 percent). Of those, the majority (62.5 percent) are seniors ages 65 years and over. Additionally, the majority of the disabled population in Hamilton County (67.1 percent) are not in the labor force and of those that are, the median earnings for this special needs population (\$27,884) is significantly lower

than the median earnings of those without a disability (\$48,428), though much of this gap may be due to differences in hours worked as it is reasonable to assume that many disabled persons who are employed may be employed less than full-time. Finally, the disabled population is significantly more likely to be living in or near poverty relative to their non-disabled counterparts with 17.5 percent of the disabled population in Hamilton County living below or near (100 to 149 percent of the poverty level) poverty compared to 6.9 percent of individuals without a disability. Additionally, United Way of Central Indiana tracks phone call requests for assistance through its 211 hotline. Of the calls to United Ways' 211 Assistance Hotline, 18 percent of the needs reported, which range from utility assistance to housing, food, healthcare, and legal/consumer/public safety services, were determined to be caused by illness or disability. Thus, overall, similar to many other trends in Hamilton County, although disabled persons in Hamilton County do better financially than disabled persons living in other parts of the state of Indiana and the nation overall, the higher cost of living in Hamilton County relative to other parts of Indiana and the country as a whole presents housing affordability and quality of life barriers to this population within the county.

The following table illustrates crime risk in Hamilton County relative to the Indianapolis-Carmel-Anderson, Indiana MSA and the nation as a whole. A score on the index above 100 indicates a risk of crime higher than the national average. Conversely, a score less than 100 indicates a risk of crime less than the national average.

2018 CRIME INDICES		
	Hamilton County	Indianapolis-Carmel-Anderson, IN Metropolitan Statistical Area
Total Crime*	59	143
Personal Crime*	44	158
Murder	48	167
Rape	75	144
Robbery	49	199
Assault	38	140
Property Crime*	61	141
Burglary	54	159
Larceny	65	133
Motor Vehicle Theft	47	159

Source: Esri Demographics 2018, Novogradac Consulting LLP, June 2019

*Unweighted aggregations

As illustrated, the risks for all types of crime in Hamilton County is well below that of both the MSA and nation as a whole. The above table however does not distinguish between types of assault and as such provides a limited view as to the prevalence of domestic violence, dating violence, sexual assault and stalking in Hamilton County. Additionally, similar to other special needs groups in Hamilton County, just because the percentage of individuals at-risk is lower than that of other area in the state or the county as a whole does not mean that there are no people who are in need of assistance. Indeed, according to a news report on Fox59 in May 2017, Hamilton County was the largest county in the state to not have a domestic violence shelter. Additionally, the report indicates that law enforcement agencies reportedly respond to more than 2,000 domestic violence calls per year. As of the date of this Consolidated Plan, there is still no domestic violence shelter located within Hamilton County; instead, victims of domestic

violence are oftentimes referred to Alternatives, Inc. of Madison County, which operates a domestic violence shelter in Anderson, which is located approximately 25 east of Hamilton County. Alternatives currently serves a six-county area including Hamilton, Hancock, Henry, Madison, Marion, and Tipton. According to Alternatives' 2018 Annual Report, 547 clients were served and a total of 7,580 safe nights provided in 2018. Of these, 51 were from Hamilton County; this was a significant increase from the two previous years during which 22 to 23 clients were provided shelter.

The 2013-2018 Hamilton County Consolidated Plan identified the lack of a domestic violence shelter as a priority and while barriers have prevented this need from being met to date, there are some signs of progress including the addition of two three-bedroom single-family rental homes for families who have survived violence that were added to the Carmel housing supply in 2018; these units operate with rental assistance and supportive services provided by Prevail, Inc., one the primary service providers for victims (adult, adolescent, and child survivors) of crime and abuse in Hamilton County. Additionally, Alternatives, Inc. recently put in place a lethality assessment tool in the Hamilton County Police Department to try to alleviate the barrier for clients in need of assistance. The tool helps law enforcement assess the magnitude of the situation and identify potential victims and connects them with Alternatives Inc. or Prevail Inc. to link the individual with an advocate; this proactive step on the part of social service and law enforcement providers eliminates a significant barrier of having to initiate seeking out help for this special needs population.

The lack of a domestic violence shelter in Hamilton County continues to be identified as a high priority need among stakeholders and members of the general public. According to the 2019 Consolidated Plan Survey, 62 percent of respondents indicated that a domestic violence shelter is a high need for the county and 91 percent of respondents indicating that it is either a medium or high need; this was the largest need indicated among the potential homeless housing facility needs and priorities presented. Additionally, according to the most recent homeless count in Hamilton County, completed in 2018, two of the homeless individuals identified in the count were reported abuse victims.

According to their 2018 Annual Report, Prevail, Inc. served 3,968 clients and offered services to an additional 648 persons, an increase of 14 percent over 2017 figures. Of those served, 27 percent were from Noblesville, 17 percent from Fishers, 14 percent from Carmel, ten percent from Westfield, and nine percent from the northern towns of Hamilton County and the remaining 23 percent were from outside of Hamilton County; this equates to approximately 3,055 individuals in Hamilton County served in 2018. Further, of all of the clients served, 78 percent were female and 25 percent were children under the age of 18. The majority of the clients served were victims of domestic violence (48 percent), followed by victims of sexual assault (37 percent), and the remainder were victims of stalking, battery, harassment, or secondary victims of other violent crimes. The vast majority of the cases identified by Prevail, Inc. stem from police reports or calls to the Prevail Crisis Line.

What are the most common housing problems?

The CHAS data set collects data on four housing problems as defined by HUD: incomplete kitchen, incomplete plumbing facilities, overcrowding (more than one to 1.5 people per room), and a housing cost burden greater than 30 percent of income. Severe housing problems are defined as severe overcrowding (more than 1.51 people per room) and severe cost burdened (a housing cost burden greater than 50 percent of income).

Although renters are more likely to have a housing problem, because there are significantly more owner households in Hamilton County, the majority of households with a housing problem are owner households. Of renter households with at least one housing problem, over half have incomes below 50 percent of the HUD Area Median Family Income (HAMFI), and over 75 percent have incomes below 80 percent of HAMFI. Of owner households with at least one housing problem, the distribution of those with a housing problem by income is more even for owner households with 31 percent with incomes below 50 percent of HAMFI and 54.6 with incomes below 80 percent of the HAMFI. Similar to households with one housing problem, while renter households are disproportionately likely to have a severe housing problem (18 percent of renter households compared to six percent of owner households), the majority of households with at least one severe housing problem are owner households, albeit only slightly (54 percent owners compared to 46 percent renters). Overall, while renter households are disproportionately likely to have housing problems, the majority of households with housing problems in the county are owner households.

Of all of the potential housing problems, the most common housing problem for all households is being cost burdened. For renters housing cost is equivalent to the gross rent (asking rent plus utilities). For owners housing cost includes the monthly mortgage payment, utilities, association fees, insurance, and real estate taxes. Severe cost burdened households are households that spend more than 50 percent of monthly income on housing costs.

The majority of households that are cost burdened and severely cost burdened are owner households. On the other hand, of all owner households, only 16 percent were cost burdened compared to 36.2 percent of all renter households. Overall, while owners comprise a larger percentage of all cost burdened households, renters are disproportionately likely to be in this category. Being cost burdened is heavily skewed towards households in the bottom end of the income distribution. Extremely low-income (ELI) and very low-income (VLI) households, both renters and owners, are significantly more likely to be cost or severe cost burdened than households with higher incomes. Additionally, ELI, VLI, and Low Income (LI) renter households within each income category are more likely than their owner counterparts to be cost burdened and severely cost burdened.

Within Hamilton County, housing problems are not evenly distributed by tenure, income, or place. While renter households are disproportionately likely to have a housing problem, including being cost burdened, when compared to their owner counterparts, because the vast majority of housing units are owner-occupied, the majority of households with a housing problem and who are cost burdened (on a count basis) are owner households. Further, ELI and VLI households regardless of tenure are more likely

than not to be cost burdened and within these income categories renters are more likely to be both cost burdened and severely cost burdened with respect to their owner counterparts. From 2016 to 2017 the only significant change in cost burden by tenure within Hamilton County was a decrease in the percentage of owners with a mortgage experiencing a cost burden. Finally, while the majority of the ELI, VLI, and LI households in the county reside primarily in the northern portion of the county, the majority of those who are severely cost burdened reside in the southern half of the county in one of the four principal cities, particularly in Fishers and Carmel.

According to the consultations, the most common housing problem is the lack of affordable housing throughout the county. According to the 2018 Hamilton County Housing Needs Assessment, there are 27 affordable and available rental units for every 100 ELI renter households, 34 affordable and available rental units for every 100 VLI and below renter households, and 69 affordable and available units for every 100 LI and below renter households, indicating a sizeable gap in the affordable housing supply in the county. For ELI and VLI households, the gap is driven by both a lack of affordable units at the respective income levels as well as higher income households occupying the already insufficient affordable housing supply. For LI and below renter households, the gap is driven exclusively by higher income households occupying the affordable housing rental supply. This occurs because the majority of the affordable rental supply in the county is not rent and income restricted, as these restricted units comprise only 7.7 percent of the rental housing stock. As a result, higher income households are eligible for these units. Overall, there is shortage of 2,205 rental units for ELI households, 3,955 rental units for VLI households and 3,465 rental units for LI households in Hamilton County. There is also a shortage of affordable and available owner units for VLI, LI, and MI owner households. The need is particularly high on a count basis for MI owner households, with a shortage of 6,700 units. In terms of need on a per household basis, however, the need is greatest among VLI and below owner households where there are only 69 units for every 100 households in this income category. The shortages at all levels are driven exclusively by higher income households occupying units that are affordable to households with lower incomes.

Are any populations/household types more affected than others by these problems?

Of renter households that are cost burdened, the majority are classified as “other”, which includes non-family households as well as non-senior single-person households, followed by small family households. Of owner households that are cost burdened, the majority are small family households followed by senior households. When analyzed by income level, while the total number of cost burdened households have incomes above 30 percent of the AMI, the largest number of severely cost burdened households are ELI households; additionally, ELI households are disproportionately likely to be cost burdened.

Overall, the Census, HUD, and consultations data indicate that seniors, special needs households including disabled persons and victims of domestic violence, extremely low-income and low-income renter and owner households are more likely to be affected by housing affordability problems.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

All ELI households, and particularly single-parent households, households on fixed-incomes such as senior households or households headed by an individual with a disability, households with poor work history, a history of mental or substance abuse or criminal history, and households who lack a personal support network, are considered at-risk. Additionally, households who lack reliable transportation are indirectly at-risk of becoming homeless as these households are at-risk of being able to maintain employment.

ELI households in Hamilton County are primarily small family households. ELI households are disproportionately likely to have housing problems, particularly housing problems related to affordability. Additionally, the vast majority of households with crowding issues are ELI renter households and the majority of these households are concentrated in Carmel, Westfield, and Fishers. Being cost burdened, and severely cost burdened in particular, puts households, and ELI households in particular, at-risk for homelessness because so much of their income must be used to pay for housing costs. According to the 2018 Housing Needs Assessment, 19 percent of respondents indicated that eviction/credit history is a barrier to housing choice in Hamilton County. The largest number of ELI renter households that are severely cost burdened are classified as “other” followed by small families and senior households. The largest number of ELI owner households are small families followed by other and senior households.

According to the most recent homeless count in Hamilton County, completed January – June 2018, on average, the vast majority of homeless individuals in Hamilton County are children. Of children who are homeless, many are doubled up on housing which means the children reside with other families due to a loss of housing or other economic hardship. One additional notable feature is that 28 of those counted were employed; this equates to 25 percent of all adults (assuming neither are repeatedly counted as appears to the case with the children). Services for homeless individuals or those at risk of homelessness are fairly limited in Hamilton County consisting primarily of one emergency housing shelter and emergency housing assistance from Township Trustees and social service providers.

Low-income individuals and families who are currently housed but at risk of homelessness oftentimes require assistance with basic necessities such as finding a more affordable housing option, food, clothing/household items, utilities, and transportation given that the majority of the household income goes toward the rent/mortgage in order to avoid eviction/foreclosure. In Hamilton County, the needs of these individuals are addressed through a combination of government support through the Township Trustee offices, social service providers, and/or personal networks. Related, but less commonly discussed needs can include, but are not limited to landlords that accept Section 8 Housing Choice

Vouchers; landlords that accept applicants with poor credit, a history of eviction, or a criminal background; and more transitional and permanent supportive housing units.

Additionally, according to the 2018 Hamilton County Housing Needs Assessment, in 2017, approximately 1,644 requests were made to Township Trustees for assistance and a total of 804 households were provided with some form of assistance. The vast majority of the assistance provided in each township was for housing related costs, including utility assistance. There was also a significant number of emergency shelter nights (797 nights) provided (both with and without township funds); the vast majority of these were provided in Washington Township. Township Trustees referred these at-risk of homelessness households to a variety of service providers throughout the county including the Salvation Army, St. Vincent DePaul, Aspire, Prevail, Third Phase, The Good Samaritan Network, the Noblesville Housing Authority, Merciful Help, and the Wheeler Mission (located in Indianapolis).

The primary shelter for Hamilton County is Third Phase, which is located south of Noblesville. Third Phase serves as a last option for Hamilton County residents before they turn to services or other shelters in Indianapolis. Third Phase provides shelter to up to 50 single men and single women at any given time for up to 30 days; the shelter does not currently accommodate families. Shelter residents are given daily tasks to assist in maintaining the facility. Third Phase also offers a food pantry and thrift store. The food pantry provides food for shelter residents as well as emergency food for members of the general public (up to once every 30 days). The thrift store provides clothing and household supplies for shelter residents as well as emergency supplies for members of the general public with a referral letter from the Hamilton County Trustee's office. Shelter residents receive additional clothing and household supplies upon leaving the shelter.

As previously mentioned, there is no formal emergency shelter or transitional housing for families in Hamilton County. In May 2019, Family Promise of Hamilton County was formed and began working to fill this gap by providing assistance to families experiencing homelessness. The organization is a non-profit organization that works through a collaboration of local churches to provide temporary housing, meals, and transportation as well as mentoring for at-risk families, teaching financial literacy, and helping parents find jobs and affordable housing for their family. According to Family Promise of Hamilton County, every month approximately 200 families in Hamilton County receive eviction notices and there is no shelter in Hamilton County for families, and shelters in neighboring municipalities are oftentimes at maximum capacity. As a result, many of these families end up sleeping in a car, couch-surfing with family or friends, or depleting any savings at extended stay motels. While the organization does not provide emergency shelter, it does provide temporary housing for families of up to 90 days with a one-time extension under special circumstances. The organization can currently serve four families at one time and expects to serve a total of 12 to 15 families in 2019 and 20 to 24 families in 2020. The majority of the requests received to date have however been for immediate emergency assistance, either financial to assist with the cost of temporary housing in a motel, or emergency shelter for families and this is not a service that is provided by the organization.

The Merciful H.E.L.P. Center is a social enterprise of Our Lady of Mount Carmel Church in Carmel. The Merciful H.E.L.P. Center offers a food pantry that served 25 to 55 families in one two-hour period in 2018. Additionally, the center offers assistance to parishioners to stay in their homes by providing assistance in filing for government aid and assisting financially through periods of unemployment. In 2010 the center established a program to help families re-establish themselves after having been homeless. Services include providing housing as well as essential furniture and houseware needs and/or a vehicle to help the individual re-enter the workforce. The organization also assists with down payments as well as utilities.

Emergency Solutions Grant Rapid Rehousing and Homeless Prevention funds in Hamilton County are administered by Aspire Indiana, Inc., a private non-profit organization, in coordination with the CoC. Aspire Indiana, Inc. serves Hamilton, Boone, Hendricks, Madison, and Hancock Counties. According to the Indiana Housing and Community Development Authority, Aspire Indiana, Inc. was awarded \$75,000 in ESG funds in 2018 of which ten percent went towards Homeless Prevention. The percent of funds spent on Hamilton County residents versus residents of the other two counties was unavailable. The 2019 awards have not yet been announced.

Finally, families and individuals who are formerly homeless have the following needs: affordable housing, jobs training, financial counseling, and assistance securing reliable transportation, child care, and/or healthcare.

Through the consultation process it was revealed that the statistics on homelessness in Hamilton County likely understate the extent of the problem as many at-risk households seek assistance from family or friends instead of/before seeking out assistance from either the government or a social service provider. Overall, the need for services to those at-risk of homelessness, currently homeless, and formerly homeless continues to exist in Hamilton County. The primary need continues to be affordable housing, followed by an emergency shelter, and one for families in particular, and a shelter for victims of domestic violence.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

While the Noblesville Housing Authority will consider any household earning less than 30 percent of the area median income to be an at-risk household, no formal analysis has been completed.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

According to the consultations, housing instability and homelessness in Hamilton County is caused by a lack of affordable housing opportunities, an unexpected loss in income, being the victim of domestic violence, and in some areas of the county, absentee/irresponsible landlords.

Discussion

Overall, the primary housing need in Hamilton County is for additional decent, safe, and quality affordable housing, both rental housing and owner housing. Providing more affordable housing units will also help the county address homelessness as this will both allow for the potential for intervention for those at-risk of becoming homeless as well as provide the potential for more transitional housing options for homeless households leaving emergency housing but who continue to be unable to afford market rate housing prices and for whom the waiting list for rental assistance persists beyond the length of time for which emergency housing assistance is available. The county will continue to address the affordable housing issue by supporting the development of new affordable units, the repair of existing housing units, and providing supportive services and advocating for shelter to the homeless and those at risk of being homeless.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section of the Consolidated Plan will analyze disproportionately greater need by examining housing problems by income group and race. Housing problems are defined by HUD as lacking a complete kitchen facility, lacking complete plumbing facility, more than one persons per room, and any household that spends more than 30 percent of its gross monthly income on housing costs.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,790	423	735
White	3,040	378	635
Black / African American	275	20	0
Asian	195	0	50
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	20
Hispanic	250	0	25

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,935	1,514	0
White	4,155	1,360	0
Black / African American	380	8	0
Asian	180	60	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	165	70	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,450	6,575	0
White	5,750	5,880	0
Black / African American	350	235	0
Asian	140	115	0
American Indian, Alaska Native	10	0	0
Pacific Islander	0	0	0
Hispanic	160	215	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,535	6,375	0
White	2,040	5,630	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Black / African American	255	295	0
Asian	95	195	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	95	235	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

The majority of households with housing problems in Hamilton County are White. This is in large part because the majority of the population is White (87 percent according to the 2018 ACS population estimates).

Among ELI incomes with one of four housing problems, 80 percent were White; among VLI households with one of four housing problems, 84 percent were White; among LI households with one of four housing problems, 89 were White; and among MI households with one of four housing problems, 80 percent were white. Despite being the most represented among those with housing problems, White households are not disproportionately likely to have a housing problem. Instead, Black/African American households are disproportionately likely to experience a housing problem and this is true for all income categories. According to the 2011-2015 ACS, Black/African Americans comprised 3.6 percent of the Hamilton County population and yet they comprise 7.3 percent of ELI households with housing problems, 7.7 percent of VLI households with housing problems, 5.4 percent of LI households with housing problems, and 10.1 percent of MI households with housing problems. Additionally, while 77 percent of all ELI households have one of four housing problems, 93 percent of ELI Black/African American households have one of four housing problems. Similarly, while 77 percent of VLI households have one of four housing problems, 98 percent of Black/African American households have one of four housing problems. ELI Hispanic households are also disproportionately likely to experience a housing problem. In fact, all ELI Hispanic households experienced either one or more of the four housing problems (91 percent) or had no/negative income, but none of the other housing problems (nine percent).

Finally, as expected, as incomes rise households of all race/ethnic groups are less likely to experience a housing problem. It is worth noting however that even among MI households, 46 percent of

Black/African American households have at least one housing problem; this is nearly 1.75 times the rate of that of White households.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section of the Consolidated Plan will analyze disproportionately greater need by examining severe housing problems by income group and race. Severe housing problems are defined by HUD as lacking a complete kitchen facility, lacking complete plumbing facility, more than 1.5 persons per room, and any household that spends more than 50 percent of its gross monthly income on housing costs.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,230	993	735
White	2,650	768	635
Black / African American	230	65	0
Asian	155	40	50
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	20
Hispanic	160	90	25

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,855	3,609	0
White	2,345	3,170	0
Black / African American	265	124	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Asian	160	85	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	55	175	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,585	11,425	0
White	1,365	10,275	0
Black / African American	85	495	0
Asian	65	185	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	70	305	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	395	8,520	0
White	265	7,420	0
Black / African American	40	515	0
Asian	40	250	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	15	320	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2011-2015 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Similar to general housing problems, the majority of households with severe housing problems in Hamilton County are White. As previously mentioned, this is due in large part to the racial/ethnic composition in the county.

Among ELI incomes with one of four housing problems, 82 percent were white; among VLI households with one of four housing problems, 82 percent were white; among LI households with one of four housing problems, 86 were white; and among MI households with one of four housing problems, 67 percent were white. Despite being the most represented among those with housing problems, White households are not disproportionately likely to have a housing problem. In fact, MI White households are disproportionately unlikely to have a severe housing problem. Instead, Black/African American households are disproportionately likely to experience a severe housing problem and this is true for all income categories. According to the 2011-2015 ACS, Black/African Americans comprised 3.6 percent of the Hamilton County population and yet they comprise 7.1 percent of ELI households with severe housing problems, 9.3 percent of VLI households with severe housing problems, 5.4 percent of LI households with severe housing problems, and 10.1 percent of MI households with severe housing problems. Additionally, while 65 percent of all ELI households have one of four severe housing problems, 78 percent of ELI Black/African American households have one of four severe housing problems. Similarly, while 44 percent of VLI households have one of four severe housing problems, 68 percent of Black/African American households have one of four severe housing problems. ELI Hispanic

households and VLI, LI, and MI Asian households are also disproportionately likely to have one of four severe housing problems.

Finally, as expected, as incomes rise households of all race/ethnic groups are less likely to experience a housing problem. It is worth noting however that even among MI households, seven percent of Black/African American households and 14 percent of Asian households have at least one severe housing problem; this over two and four times, respectively, the rate of that of White households.

Overall, low and moderate-income households that are severely cost burdened are considered at-risk, particularly extremely low-income households, as this level of housing burden leaves very little disposable income for other basic necessities such as food and transportation, never mind emergencies. In fact, Michael Stone of the University of Massachusetts Boston coined the term “shelter poverty” to describe this very condition – when a household is forced to cut back on basic necessities because of the high cost of housing. Any initiatives Hamilton County funds in the coming years as part of this Consolidated Plan should encourage outreach to these populations.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

This section of the Consolidated Plan assesses housing cost burdens by race and ethnicity.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50% (Cost Burden)	>50% (Severe Burden)	No / negative income (not computed)
Jurisdiction as a whole	82,585	13,054	8,040	740
White	72,400	11,555	6,710	635
Black / African American	2,750	675	635	0
Asian	4,405	315	330	50
American Indian, Alaska Native	58	25	0	0
Pacific Islander	0	0	0	20
Hispanic	2,019	405	290	25

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion:

The majority of households with a cost burden and severe cost burden are White. Despite being the most represented among those with cost burden housing problems, White households are not disproportionately likely to have a housing problem. In fact, MI White households are disproportionately unlikely to have a severe housing problem. Instead, Black/African American households are disproportionately likely to experience a severe housing problem and this is true for all income categories. Additionally, ELI Hispanic households and VLI, LI, and MI Asian households are also disproportionately likely to have one of four severe housing problems.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

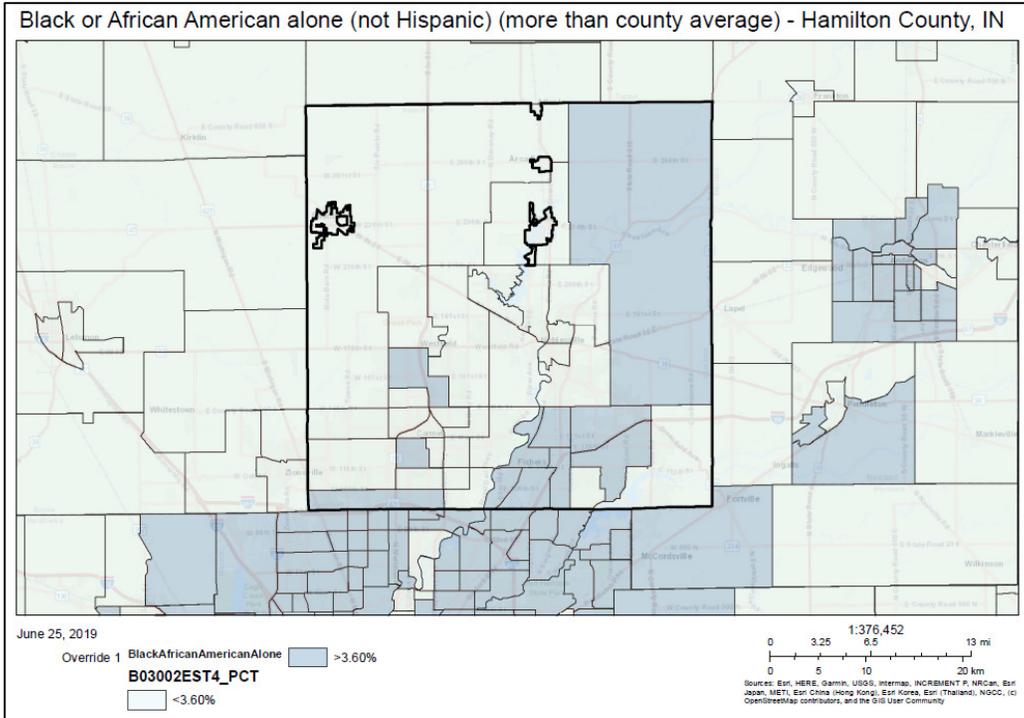
Black/African Americans living in Hamilton County are disproportionately likely to have one of four housing problems, be cost burdened, and be severely cost burdened and this is true for all income groups analyzed. Further, ELI Hispanic households are disproportionately likely to have one of four housing problems and be cost burdened. Finally, VLI, LI, and MI Asian households are also disproportionately likely to have one of four severe housing problems.

If they have needs not identified above, what are those needs?

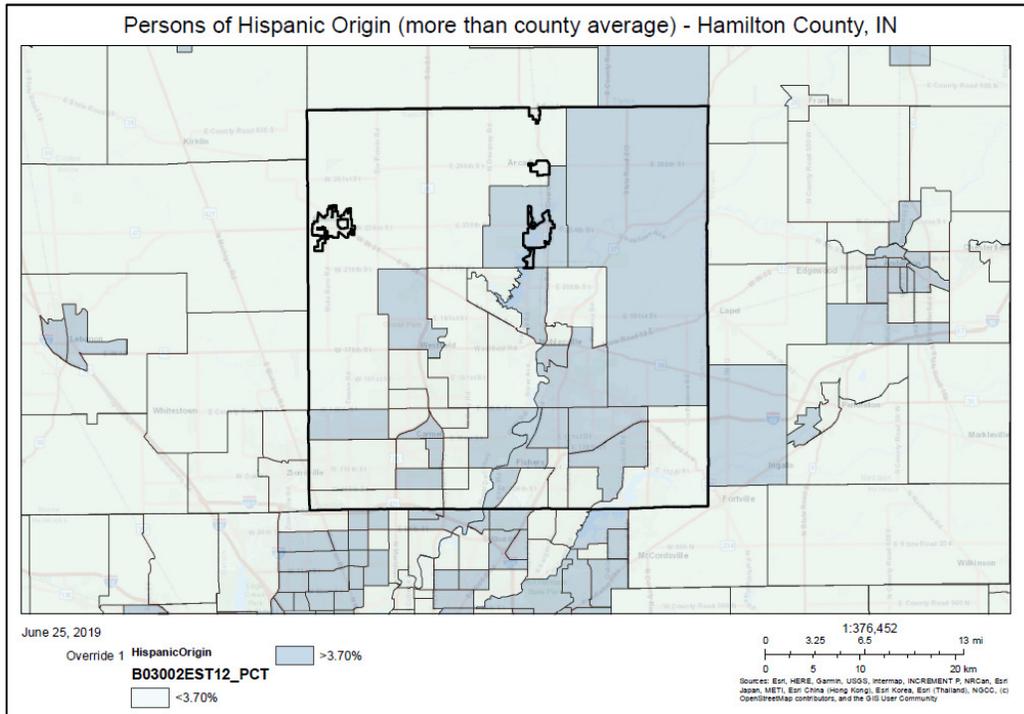
Irrespective of race/ethnicity, all ELI, VLI, and LI households in the community require educational opportunities, language training, and/or workforce training programs all of which can contribute to upward social mobility.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Although there are no Racial/Ethnic-Concentrated Areas of Poverty (R/ECAP) located in Hamilton County, there are neighborhoods within the county which have an overrepresentation of minority groups. As previously mentioned approximately 3.7 percent of individuals in Hamilton County are Hispanic and 3.6 percent are Black/African American. The following maps illustrate the neighborhoods within Hamilton County where these minority groups are overrepresented.



Source: HUD, CPD Maps, June 2019



Source: HUD, CPD Maps, June 2019

As illustrated, select neighborhoods of Carmel, the majority of the neighborhoods of Fishers, and the unincorporated northeastern portion of Hamilton County have an above average number of Black/African American residents. Select neighborhoods in Carmel, Westfield, Fishers, Noblesville, and the unincorporated northeastern portion of Hamilton County have an above average number of Hispanic residents. One neighborhood in particular southwest of downtown Carmel has a sizeable Hispanic population (approximately 13.95 percent).

The 2016 Analysis of Impediments to Fair Housing (AI) “did not find any regulatory impediments to fair housing choice”, but did indicate that “housing discrimination in Hamilton County can come in more subtle ways through the lack of affordable housing development, challenges to find ways to report housing discrimination, housing discrimination that still occurs despite knowledge of fair housing laws and changes in leadership and advocacy that will cause a gap in affordable housing development.” Despite this conclusion, Hamilton County and the City of Noblesville, voluntarily settled a fair housing complaint in 2018 stemming from fair housing violations in Noblesville. This issue and solutions to resolving the issues will be discussed later in this Consolidated Plan.

What this tells us is that Hamilton County’s affordable housing projects will need to be marketed to a variety of income groups and developed in a variety of areas.

NA-35 Public Housing – 91.205(b)

Introduction

The NHA is the public housing agency for Hamilton County. NHA does not manage public housing units; for public housing units interested parties would have to go outside of the county to neighboring markets such as Anderson and Indianapolis. There are however USDA rental assistance units and both Section 8 project-based (attached to a unit) and tenant-based (attached to an individual) vouchers available in Hamilton County. First, there are a total of 429 subsidized units (includes USDA rental assistance and project-based Section 8 units) in Hamilton County. Three of the four towns and two of the four cities have some subsidized housing units; there are no subsidized units in Fishers or Carmel. The properties in the towns and Westfield, however, are fairly small in size and as such constitute only 22 percent of the total supply collectively; 78 percent of the subsidized rental supply is in Noblesville at Noble Manor, the one Section 8 property in Hamilton County. Tenant-based rental assistance comes in the form of Section 8 Housing Choice Vouchers.

Two organizations issue Section 8 Housing Choice Vouchers in Hamilton County: Community Action of Greater Indianapolis (CAGI) and the NHA. According to the 2018 Hamilton County Housing Needs Assessment, the CAGI manages approximately 112 vouchers in Hamilton County and the NHA is permitted to administer 185 voucher. In February 2019 however a ten-unit property in Sheridan that previously operated with a project-based voucher converted from a project-based voucher to enhanced tenant based vouchers for the four units which were occupied at the time of the conversion. Thus, the NHA is now permitted to administer 189 vouchers of which 184 were currently issued and in use. Of the 189 vouchers administered by NHA, 75 of those are designated for Non Elderly Disabled households and 3 are Project Based Vouchers located at Spicewood Gardens Apartments, a LIHTC development located in Sheridan. The housing authority also administers 42 port-in vouchers and has one voucher that was ported out.

Typically, for all of the aforementioned forms of rental assistance, the household pays 30 percent of their gross monthly income towards rent and utilities and the voucher subsidizes the difference between the rent and the tenant paid portion of the rent where the rent is set by the landlord with maximum rents established by the NHA. Thus, if a two-bedroom apartment is \$700 per month and the household can only afford \$250 per month, the remaining \$450 of rent is paid by the rental assistance subsidy.

It is worth noting that select data provided by HUD (see tables below) appears to be incorrect; we have relied on the aforementioned numbers for this analysis.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	215	3	177	0	0	35

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	0	12,007	9,038	12,126	0	0	
Average length of stay	0	0	0	6	0	6	0	0	
Average Household size	0	0	0	1	1	1	0	0	
# Homeless at admission	0	0	0	4	0	4	0	0	
# of Elderly Program Participants (>62)	0	0	0	71	1	67	0	0	

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# of Disabled Families	0	0	0	102	2	68	0	0
# of Families requesting accessibility features	0	0	0	215	3	177	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	163	3	128	0	0	32
Black/African American	0	0	0	50	0	47	0	0	3
Asian	0	0	0	1	0	1	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	1	0	1	0	0	0
Other	0	0	0	0	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	6	0	6	0	0	0
Not Hispanic	0	0	0	209	3	171	0	0	35

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The Noblesville Housing Authority does not manage any public housing properties.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Demand for rental assistance in Hamilton County is significant. According to the 2018 Hamilton County Housing Needs Assessment, subsidized units in the market were 97.4 percent occupied and five of the six properties offering project-based rental assistance (Section 8 or USDA) reported extensive waiting lists.

The waiting list for the Section 8 Housing Choice Voucher program is currently closed. The waiting list was last opened from October 2-9, 2018 during which 1,443 applications were received. Turnover of vouchers is slow as most households do not “graduate” from needing a subsidy. Most voucher holders are elderly and disabled, returning their voucher when they cannot live independently or pass away. Given the limited number of vouchers administered and the low turnover among households receiving this rental assistance subsidy, the NHA selected only 200 applicants from the applicant pool based on local preferences and a lottery system to add to the waiting list. Preferences include applicants who live or work in Hamilton County (30 points), elderly or disabled (10 points), applicants who live or work in Indiana (10 points), and veterans or surviving spouses of veterans (five points). There are currently 166 households on the waiting list including 47 that have a household member with a disability, 19 of whom are elderly households, and 97 of whom are families with children. Additionally approximately 54 percent (89 households) are extremely low-income, 40 percent (66 households) are very low income, six percent (ten households) are low income, and one is over the income limit. The average wait for selected applicants is currently 270 days. Demand for new vouchers has increased with the cost burden of housing in Hamilton County increasing for many families, including the elderly.

The demand for rental assistance comes from both existing Hamilton County residents in search of more affordable housing as well as from households employed in Hamilton County in search of affordable housing closer to their source of employment. Demand for one-bedroom units is particularly great among applicants for rental assistance through the NHA. Many of the residents are single-person households and there is a limited supply of affordable one-bedroom units in the market, particularly non age-restricted one-bedroom units. ADA accessible units and ground floor units are also in high demand, in part because of the limited supply of these units.

Turnover for both project-based rental assistance units and tenant-based units is reportedly low indicating that most households do not “graduate” from needing a subsidy. In particular, most tenant-based voucher holders are elderly and disabled, returning their voucher only when they cannot live independently or pass away. This trend is driven at least in part by the lack of available affordable rental housing for low to moderate income households. In fact, according to the 2018 Hamilton County Housing Needs Assessment, only approximately 36 percent of occupied rental units affordable to ELI

renter households are in fact available to (aka occupied by) ELI households; the remaining 64 percent of occupied rental units that would be affordable to ELI renter households are in fact occupied by households with higher incomes. In fact, approximately 25 percent of occupied units that would be affordable to ELI households are occupied by households with incomes above 100 percent of the HAMFI. Overall, there are 27 affordable and available rental units for every 100 ELI renter households, 34 affordable and available rental units for every 100 VLI and below renter households, and 69 affordable and available units for every 100 LI and below renter households, indicating a sizeable gap in the affordable housing supply in the county. For ELI and VLI households, the gap is driven by both a lack of affordable units at the respective income levels as well as higher income households occupying the already insufficient affordable housing supply. For LI and below renter households, the gap is driven exclusively by higher income households occupying the affordable housing rental supply. This occurs because the majority of the affordable rental supply in the county is not rent and income restricted, as these restricted units comprise only 7.7 percent of the rental housing stock. As a result, higher income households are eligible for these units.

Overall, the above analysis suggests that one of the primary needs for tenant-based voucher holders and occupants of project-based voucher units is the addition of affordable rental units targeted toward LI and MI households, and LIHTC units in particular. This will both provide more opportunities for upward mobility but also provide more units that accept vouchers as the majority of the market rate housing stock does not currently accept vouchers. Other needs reportedly include assistance with utility payments and/or transportation.

How do these needs compare to the housing needs of the population at large

Rising housing prices and the increasing cost of living in Hamilton County appears to have impacted the majority, if not all, of those living in Hamilton County, albeit to different degrees, as the need for affordable housing opportunities is a community-wide housing need. While residents of project-based or holders of tenant-based vouchers should by definition not be cost-burdened, absent these subsidies many of these households would likely be cost or severely cost burdened. Additionally, the need for additional affordable units for those in the middle, i.e. those who are over-income for subsidized housing but under-income for market rate housing, is a housing need for the whole community. Similarly, the non-housing needs (utility, transportation, healthcare, and/or childcare assistance) of voucher holders are likely to be comparable to, albeit possibly less severe, those of their similarly income counterparts that do not benefit from rental assistance; the difference is a matter of magnitude as voucher households should have more disposable income than a household with a similar income but no rental assistance.

Discussion

The most immediate need for is for additional affordable housing, both vouchers and LIHTC units. There is also a need for assistance with utility payments and transportation. Demand for rental assistance and other forms of affordable housing have increased with rising home and rent prices. Without rental

assistance and rent/income restricted rental units, many low to moderate-income families will continue to be cost burdened.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

With the amount of wealth in Hamilton County, homelessness is a hidden and misunderstood issue in the community. Hamilton County is part of Region 8 in the Indiana Balance of State Continuum of Care along with Boone, Madison, Hendricks, and Hancock Counties. The Indiana Balance of State Continuum of Care (CoC) is the planning body for initiatives in ending homelessness in Indiana. To do so, this group supports the development and ongoing maintenance of a strategic, comprehensive system to address homelessness. This includes strategies for engaging mainstream partnerships, the provision of shelter, temporary housing, services, and permanent housing. The goal is to ensure that all residents of the state of Indiana are able to access and maintain permanent housing.

The following table illustrates the most recent homeless count data for Hamilton County. It is worth noting that the extent of repeat counts is unknown. It is reasonable to assume that at least some of the children numbers are repeat counts and as such we have focused primarily on the average counts across the first six months of the 2018 calendar year. It is also unclear if adults are accounted for when a child is counted as homeless; based on the counts it appears as though this is not the case.

Date	House holds	Adult	Child	Total People	Male	Female	Abused	Disability	Vet	Pregnant	Pets	Cars	Job	HUD Def.	M-V Def.
Jan 2018	161	7	185	192	47	64	0	0	0	0	0	2	2	11	181
Feb 2018	165	13	189	180	63	47	0	0	0	0	0	4	5	19	183
March 2018	164	10	153	197	49	69	0	1	0	0	0	3	8	16	181
April 2018	198	48	206	254	50	69	0	2	0	0	1	1	4	68	186
May 2018	137	15	154	169	34	56	1	4	0	0	1	2	4	9	160
June 2018	145	19	156	175	38	58	1	3	0	1	0	5	5	26	149
July 2018															
August 2018															
Sept 2018															
Oct 2018															
Nov 2018															
Dec 2018															
Total	970	112	1043	1167	281	363	2	10	0	1	2	17	28	149	1040
Average	162	19	174	195	47	61	0	2	0	0	0	3	5	25	173
%		10%	89%		24%	31%	0%	1%	0%	0%	0%	1%	2%	13%	89%
Avg Household Size:	1.203093														

Source: Aspire Indiana; 2018 Hamilton County Housing Needs Assessment

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Hamilton County is in Region 8 of the Indiana Balance Continuum of Care. The most recent Point in Time Count numbers are from specific dates in each month from January to June 2018. The homeless count conducted in Hamilton County does not distinguish between the number of persons becoming homeless, exiting homelessness, or the number of days persons experienced homelessness. Instead, the homeless count distinguishes homeless individuals based on age, sex, special need (if applicable), and assets/resources of the homeless individual (pet, car, and/or job).

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The following are the main takeaways from the 2018 homeless count for which data is available.

- The majority of homeless individuals in Hamilton County were children. Of children who were homeless, many were doubled up on housing which means the children reside with other families due to a loss of housing or other economic hardship.
- On average, five (26 percent) of the 19 counted homeless adults were employed.
- Among special needs groups, disabled individuals were the most represented. No homeless veterans were counted in the most recent count data.

The 2018 homeless count numbers represent a significant increase over the 2013 homeless count data (11 individuals and 146 children) reported in the 2013-2018 Consolidated Plan. On average, 19 adults and 174 children were reported as homeless in any given month during the first half of 2018. From the count data, it is unknown how many of the homeless individuals counted were sheltered versus unsheltered.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The most recent count data does not distinguish the race and ethnicity of its homeless population.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The most recent count data does not distinguish between sheltered and unsheltered homelessness.

Discussion:

With the amount of wealth in Hamilton County, homelessness is a hidden and misunderstood issue in the community. According to the most recent homeless count, on average 19 adults and 174 children are homeless in any given month in Hamilton County. The recent counts represent a significant increase over the 2013 homeless count whereby 11 homeless individuals and 146 families were counted in Hamilton County. Consultations confirm the aforementioned trend of an increasing homeless population in Hamilton County.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

This section discusses the characteristics and needs of persons who have special needs, but who are not homeless. These groups include the elderly, frail elderly, persons with mental, physical, and/or developmental disabilities; persons with alcohol or other drug addiction; persons with HIV/AIDS and their families; and victims of domestic violence, sexual assault, dating violence, and stalking. Additionally, many of these non-homeless special needs individuals and families are also extremely low to moderate income households.

Describe the characteristics of special needs populations in your community:

Elderly & Frail Elderly – According to the 2018 ACS, approximately 12.4 percent of the Hamilton County population is over the age of 65; 4.8 percent of the population is over the age of 75 and 1.4 percent of the population is over the age of 85. Although below national and statewide trends in terms of its senior population, the percentage of households with one or more people 65 years and over in Hamilton County has increased over time. In fact, all four of the cities (Carmel, Fishers, Noblesville, and Westfield) and one of the towns (Atlanta) experienced an increase in the proportion of households with at least one senior from the 2007-2011 to the 2012-2016 period. Additionally, of the 2013-2017 ACS, approximately 40.6 percent of senior households are one-person households, 84.9 percent are homeowners, 8.2 percent have incomes below the poverty line, 3.9 percent receive Supplemental Security Income, and two percent receive SNAP benefits. Overall, seniors in Hamilton County appear to be faring better than their counterparts in other parts of Indiana and the nation as a whole. However, the cost of living in Hamilton County is higher than that in other parts of the state. For example, according to the 2013-2017 ACS, the median senior owner cost with a mortgage was \$1,281 compared to \$965 in Indiana and the median gross rent paid by seniors was \$1,058 compared to \$690 in Indiana. As a result, according to the 2013-2017 ACS, significantly more seniors in Hamilton County are paying 30 percent or more of their income in owner or rental housing costs (24.7 percent of owner households in Hamilton County compared to 20.4 percent in Indiana and 61.9 percent of renter households in Hamilton County compared to 51.0 percent of renter households in Indiana). Thus, overall, similar to many other trends in Hamilton County, although seniors in Hamilton County do better financially than seniors living in other parts of the state of Indiana and the country as a whole, the higher cost of living in Hamilton County relative to other parts of Indiana and the country as a whole presents housing affordability challenges and other basic necessity needs to this population within Hamilton County.

Mental, Physical and/or developmental disabilities - According to the 2017 ACS, approximately 8.9 percent of the total civilian noninstitutionalized population in Hamilton County has a disability; this is less than the state (13.9 percent) and nation (12.7 percent). Of those, the majority (62.5 percent) are seniors ages 65 years and over. Additionally, the majority of the disabled population in Hamilton County (67.1 percent) are not in the labor force and of those that are, the median earnings for this special needs population (\$27,884) is significantly lower than the median earnings of those without a disability

(\$48,428), though much of this gap may be due to differences in hours worked as it is reasonable to assume that many disabled persons who are employed may be employed less than full-time. Finally, the disabled population is significantly more likely to be living in or near poverty relative to their non-disabled counterparts with 17.5 percent of the disabled population in Hamilton County living below or near (100 to 149 percent of the poverty level) poverty compared to 6.9 percent of individuals without a disability. Additionally, United Way of Central Indiana tracks phone call requests for assistance through its 211 hotline. Of the calls to United Way's 211 Assistance Hotline, 18 percent of the needs reported, which range from utility assistance to housing, food, healthcare, and legal/consumer/public safety services, were determined to be caused by illness or disability. Thus, overall, similar to many other trends in Hamilton County, although disabled persons in Hamilton County do better financially than disabled persons living in other parts of the state of Indiana and the nation, the higher cost of living in Hamilton County relative to other parts of Indiana and the country as a whole presents housing affordability challenges and other basic necessity needs to this population locally.

Alcohol/Drug Addiction – According to the 2019 Community Health Needs Assessment conducted by Aspire Indiana, Inc. substance abuse is a growing concern throughout the state. In 2017 Hamilton County had 38.8 people per 100,000 visit an emergency room with a non-fatal opioid overdose and 14.83 drug poisoning deaths per 100,000 people. According to the Indiana State Department of Health, Hamilton County had 4.5 non-fatal heroin overdose hospitalizations per 100,000 and 4.8 opioid drug overdose deaths per 100,000. These figures are generally below the statewide average.

Persons with HIV/AIDS and their families - The Indiana State Department of Health releases an annual report on the presence of the HIV/AIDS virus by county. As of December 31, 2018, there were 14 new HIV/AIDS cases reported in Hamilton County and a total of 253 total persons living with HIV/AIDS including cases diagnosed in other states and currently living in Hamilton County, Indiana as of December 31, 2018. While the number of new cases reported in Hamilton County is higher than that of neighboring rural and suburban counties of Boone (less than five), Tipton (less than five), and Madison (six), it is less than that of neighboring Marion County (204), which is where the principal city of the MSA, Indianapolis, is located, and where there is the highest total number of persons living with HIV/AIDS (5,213 persons) in the state.

Victims of domestic violence, sexual assault, dating violence, and stalking – According to the 2018 Annual Report of Prevail, Inc., one of the primary service providers in Hamilton County for victims of domestic violence, the organization served 3,968 clients and offered services to an additional 648 victims of crime and abuse, an increase of 14 percent over 2017 figures. Of those served, 27 percent were from Noblesville, 17 percent from Fishers, 14 percent from Carmel, ten percent from Westfield, and nine percent from the northern towns of Hamilton County and the remaining 23 percent were from outside of Hamilton County; this equates to approximately 3,055 individuals in Hamilton County served in 2018. Further, of all of the clients served, 78 percent were female and 25 percent were children under the age of 18. The majority of the clients served were victims of domestic violence (48 percent), followed by victims of sexual assault (37 percent), and the remainder were victims of stalking, battery,

harassment, or secondary victims of other violent crimes. The vast majority of the cases identified by Prevail, Inc. stem from police reports or calls to the Prevail Crisis Line.

What are the housing and supportive service needs of these populations and how are these needs determined?

The needs of each group were determined based on an analysis of secondary data including a review of service providers' websites and annual reports as well through the consultation process which included both surveys of key stakeholders and the general public to assess community-wide needs as well as one-on-one interviews with service providers to assess group specific needs.

According to the 2019 Consolidated Plan Survey, which asked respondents to identify community-wide needs, mental health services, substance abuse/treatment services, domestic violence services, and transportation assistance were most likely to be identified as High Needs for the community. While services for seniors and disabled households were slightly less likely to be selected as a High Need, these two categories were just as likely to be selected as a Medium (some federal funding and other sources should be used for this purpose) or High need; in other words, very few respondents indicated that the need for services for these non-homeless special needs groups were Low (may be beneficial but federal funds should not be used for this purpose) and as such should not be funded using CDBG funds. Overall, the most significant needs for these populations are affordable housing including rental assistance; assistance with home repairs; transportation assistance; food assistance including weekend meals; and, emergency assistance including case management.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The Indiana State Department of Health releases an annual report on the presence of the HIV/AIDS virus by county. As of December 31, 2018, there were 14 new HIV/AIDS cases reported in Hamilton County and a total of 253 total persons living with HIV/AIDS including cases diagnosed in other states and currently living in Hamilton County, Indiana as of December 31, 2018. While the number of new cases reported in Hamilton County is higher than that of neighboring rural and suburban counties of Boone (less than five), Tipton (less than five), and Madison (six), it is less than that of neighboring Marion County (204), which is where the principal city of the MSA, Indianapolis, is located, and where there is the highest total number of persons living with HIV/AIDS (5,213 persons) in the state.

Discussion:

Special needs populations include the elderly, frail elderly, persons with mental, physical, and/or developmental disabilities; persons with alcohol or other drug addiction; persons with HIV/AIDS and their families; and victims of domestic violence, sexual assault, dating violence, and stalking. Many of these non-homeless special needs households are also extremely low to moderate income households. Of these non-homeless special needs groups, the largest within Hamilton County are the elderly/frail

elderly followed by individuals with a disability. While there are service providers in the county dedicated to each of the aforementioned non-homeless special needs groups, the biggest gap in services according to the consultation process appears to be services for some of the smaller special needs groups. According to the 2019 Consolidated Plan Survey, mental health services, substance abuse/treatment services, domestic violence services, and transportation assistance were most likely to be identified as High Needs for the community. Transportation assistance was identified as a community-wide need as well as a group-specific need for many of the special needs groups. While services for seniors and disabled households were slightly less likely to be selected as a High Need, these two categories were just as likely to be selected as a Medium (some federal funding and other sources should be used for this purpose) or High need; in other words, very few respondents indicated that the need for services for these non-homeless special needs groups were Low (may be beneficial but federal funds should not be used for this purpose) and as such should not be funded using CDBG funds. Overall, the most significant needs for these populations are affordable housing including rental assistance; assistance with home repairs; transportation assistance; food assistance including weekend meals; and, emergency assistance.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

CDBG funds can pay for the construction, rehabilitation, or installation of public facilities. Eligible public facilities include neighborhood facilities (such as educational centers, parks, recreation centers, and libraries) and facilities for special needs populations (such as homeless shelters, elderly facilities, or centers for disabled persons). The following public facility needs were identified:

- Domestic violence shelter
- Emergency shelter
- Mental healthcare facilities
- Substance abuse treatment facilities
- Day center for persons with disabilities

How were these needs determined?

The aforementioned needs were determined based on an analysis of the characteristics and needs of the community as well as a review of existing available facilities as well as public input from the 2019 Consolidated Plan Survey as well as other input received from key stakeholders during the consultation process.

Describe the jurisdiction’s need for Public Improvements:

CDBG funds can pay for the construction, rehabilitation, or installation of public improvements. Public improvements include, but are not limited to, street and sidewalk improvements, water and sewer installation, and maintenance and ADA compliance construction and rehabilitation.

Public improvements were, on average, less likely than public facilities and public services to be identified as a High Need in the 2019 Consolidated Plan Survey. In fact, none of the potential public improvements were more likely to be identified as a High Need than a Medium or Low Need. The majority of respondents identified the following public improvements as either a Medium or High Need:

- Street and sidewalk improvements
- Handicap access improvements
- Stormwater drainage/flooding improvements

How were these needs determined?

The aforementioned needs were determined based on the results of the 2019 Consolidated Plan Survey as well as other input received from key stakeholders during the consultation process.

Describe the jurisdiction’s need for Public Services:

Up to 15 percent of CDBG funds can pay for public services. Eligible public services include, but are not limited to, homeless services, education and workforce development programs, homebuyer counseling, elderly care and programs, and child care and health services.

The following public service needs were identified:

- Transportation assistance
- Mental health services
- Substance abuse treatment/services
- Domestic violence services
- Services for persons with disabilities
- Services for seniors

How were these needs determined?

The aforementioned needs were determined based on an review and analysis of secondary data (for example, ACS data on group characteristics and trends, data from United Way 211, Township Trustee offices, and service providers annual reports) as well as input from the consultation process.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Hamilton County is in central Indiana in the Indianapolis-Carmel-Anderson Metropolitan Statistical Area (MSA). The MSA consists of a total of 11 counties: Marion, Hamilton, Hendricks, Johnson, Madison, Hancock, Morgan, Boone, Shelby, Putnam, and Brown. Marion County is the most populated county within the MSA and is home to the anchor city, Indianapolis; Hamilton County is the second most populated county within the MSA. Marion County and Indianapolis are located immediately south of Hamilton County. Hamilton County is, however, the fastest growing county within the MSA (and the state) with a reported population increase of 20.2 percent since 2010, compared to 3.1 percent in Indiana as a whole and this growth is projected to continue through 2050.

Hamilton County contains four cities (Carmel, Fishers, Noblesville, and Westfield), four towns (Arcadia, Atlanta, Cicero, and Sheridan) as well as unincorporated areas and covers approximately 402 square miles. Noblesville is the county seat and is fairly centrally located within the county. All four of the cities are located in the southern half of the county, serving as suburbs to Indianapolis, while the towns are located in the northern half of the county and remain relatively rural; this is consistent with typical patterns of development given that the original principal city of the area, Indianapolis, is located south of Hamilton County.

Hamilton County has a newer housing stock than that of Indiana or the nation as a whole, with nearly 67 percent of the housing stock built since 1990 compared to nearly 31 and 32 percent in the state and nation, respectively. Detached single-family homes dominate the housing markets of all places considered. The second most common structure type as a percentage of the housing stock varies by place within Hamilton County. Duplexes are more common in Atlanta and Sheridan, particularly when compared to the cities; small multifamily buildings (fewer than 20 units) are more common in Noblesville and Arcadia than the other places within the county; large multifamily, while less common in the county as a whole when compared to state and nationwide trends, is most common in Carmel; finally, mobile homes are most common in Atlanta and Sheridan.

Hamilton County has consistently maintained a significantly lower housing unit vacancy rate when compared to the state and the nation as a whole, and this trend is projected to continue through 2022. Within the county, the housing unit vacancy rate varies. Arcadia, Atlanta, and Sheridan have vacancy rates above the countywide average, but more in line with statewide and national trends. Conversely, Fishers has the lowest average housing unit vacancy rate. The relatively low vacancy rates in places such as Carmel, Fishers, and Westfield despite the significant new additions to the housing supply are indicative of strong demand for housing in the market as a whole and in these places in particular. When compared to historical trends, the housing unit vacancy rate decreased in Hamilton County as a whole

as well as in the Noblesville and Westfield markets. Vacancy however varies considerably by tenure with significantly higher vacancy among rental units than owner units in most areas of analysis.

In addition to being the fastest growing county in the state, Hamilton County is also the wealthiest and the most well educated, has the highest health ranking, and the lowest poverty rate and community distress score in the state. According to the most recent data available from the ACS, Stats Indiana, and Aspire Indiana Health Community Needs Assessment, Hamilton County is characterized as follows:

- Fourth largest county in the state (ranked 4th out of 92 counties)
- Fastest growing county in the state since 2010 Census (20.7 percent)
- Highest per capita personal income (\$71,377)
- Highest median household income (\$95,080)
- Highest median home value (\$266,500)
- Highest median contract rent (\$1,091)
- Most well educated (96.2 percent have high school diploma or more; 57.5 percent have bachelor's degree or more)
- Lowest poverty rate (3.8 percent)
- First in health factors and outcomes
- Lowest community distress score
- One of the highest average wage per job for covered employment (\$53,961; ranked 5th)
- One of the lowest unemployment rates (2.7 percent; ranked 81st)
- Despite being primarily White (87.4 percent are White alone, ranked 4th), the county also has the second largest Asian population (5.8 percent), seventh largest Black/African American population (3.6 percent), and eighth largest Hispanic or Latino population (3.8 percent)

These facts makes it difficult to imagine any part of the population in Hamilton County may be struggling to make ends meet, either because of lack of affordable housing, low income or unemployment, or the lack of connection to social services/resources. Despite all of Hamilton County's successes, there are still a large number of individuals and households in the county that are disadvantaged and underserved. While many of these households have special needs (services and facilities), other needs (housing, transportation, and infrastructure improvements) transcend group characteristics and are considered community wide needs. This fact is evident in the county health rankings which rank counties on four categories of health factors: health behaviors (tobacco use, diet & exercise, alcohol and drug use, sexual activity), clinical care (access to care, quality of care), social and economic factors (education, employment, income, family & social support, community safety), and the physical environment (air & water quality, housing and transit). Overall, Hamilton County ranks first in the state. Hamilton County also ranks first in health behaviors and clinical care and third in terms of social and economic factors. The only outlier is Hamilton County's ranking in terms of the physical environment where Hamilton County ranks 18th. This is driven in large part by housing and transportation issues in the county.

Within Hamilton County, housing problems are not evenly distributed by tenure, income, or place. While renter households are disproportionately likely to have a housing problem, including being cost burdened, when compared to their owner counterparts, because the vast majority of housing units are owner-occupied, the majority of households with a housing problem and who are cost burdened (on a count basis) are owner households. Further, ELI and VLI households regardless of tenure are more likely than not to be cost burdened and within these income categories renters are more likely to be both cost burdened and severely cost burdened with respect to their owner counterparts. Finally, rising housing costs have been primarily concentrated in the cities.

Hamilton County has the highest median home value (\$266,500) in the state and the value has increased significantly over the past ten years whereas the median household income has remained relatively stagnant. The average median home value from 2008 to 2012 was \$214,400 compared to \$240,000 from 2013 to 2017, a statistically significant increase. Meanwhile the average median household income from 2008 to 2012 was \$90,647 compared to \$90,582 from 2013 to 2017. Additionally, in recent years, however there has been an increased recognition that transportation costs, which oftentimes account for the second largest expenditure in a household budget, play a significant role in the overall affordability of housing. As a result, researchers and planners alike have started to focus more on the combined impact of housing and transportation costs on household budgets to determine the affordability of communities. In places that are dominated by commuters and where public transportation is limited, transportation costs are oftentimes even more significant in terms of their impact on a household budget. According to the Center for Neighborhood Technology, as cited in the 2018 Housing Needs Assessment, on average, Hamilton County households spend 35 percent of household income on housing and 26 percent of household income on transportation, or 61 percent combined. The average for the Indianapolis-Carmel Anderson MSA is 25 percent on housing and 25 percent on transportation, or 50 percent on housing and transportation combined. Hamilton County has a significantly larger percentage of cost burdened households and the majority of this trend is driven by high housing costs.

Overall, the Hamilton County housing market is dominated by owner-occupied housing units many of which are relatively recently constructed and high (and rising) housing and transportation costs. The following themes emerged throughout the consultation process:

- **General Affordability:** Hamilton County has the highest incomes and lowest poverty rates in Indiana, but high and rising housing costs continue to be a significant burden for many extremely low to moderate income households. This burden contributes to economic insecurity for many extremely low to moderate income households and puts housed and formerly homeless households at-risk of becoming homeless as many are one emergency away from an eviction/foreclosure and homeless households unable to transition into shelter. While these problems have historically been concentrated to households in the lower end of the income distribution, ongoing and substantial increases in housing and transportation costs have resulted in this problem creeping up the income distribution to now impacting moderate and middle-

income individuals/households the majority of whom are employed. High home prices continue to limit the ability of retail and service workers, including teachers and public servants, to purchase or rent a home in the communities where they work.

- Neighborhoods: The high dependence on commuting results in citizens having less time to be fully engaged in their neighborhoods.
- Demographics: Baby Boomers increasingly will drive the housing market, and whether they are prepared for retirement or not, Hamilton County will have to prepare for this expansion. Senior housing is only one of the housing needs in Hamilton County, but there is still substantial need to accommodate the aging population that will continue to grow through the middle part of the next century.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

This section of the Consolidated Plan addresses the number and characteristics of housing units in Hamilton County. Data from HUD covers the 2011-2015 period. Where necessary, we have supplemented this with more recent ACS data as well as with information obtained through the consultation process.

As of the 2017 ACS, there were 120,138 housing units in Hamilton County. The majority of the housing stock in Hamilton County is detached single-family homes. The number of housing units has significantly increased over the past ten years, an increase that was driven in large part by a significant increase in the number of large multifamily properties (20 or more units).

The vast majority of owner-occupied housing units offer three or more bedrooms. The rental housing stock on the other hand is significantly more diversified with a sizeable percentage of rental homes offering one, two, or three-bedrooms.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	84,855	78%
1-unit, attached structure	4,725	4%
2-4 units	3,240	3%
5-19 units	11,544	11%
20 or more units	3,790	3%
Mobile Home, boat, RV, van, etc.	1,315	1%
Total	109,469	100%

Table 26 – Residential Properties by Unit Number

Data Source: 2011-2015 ACS

Unit Size by Tenure

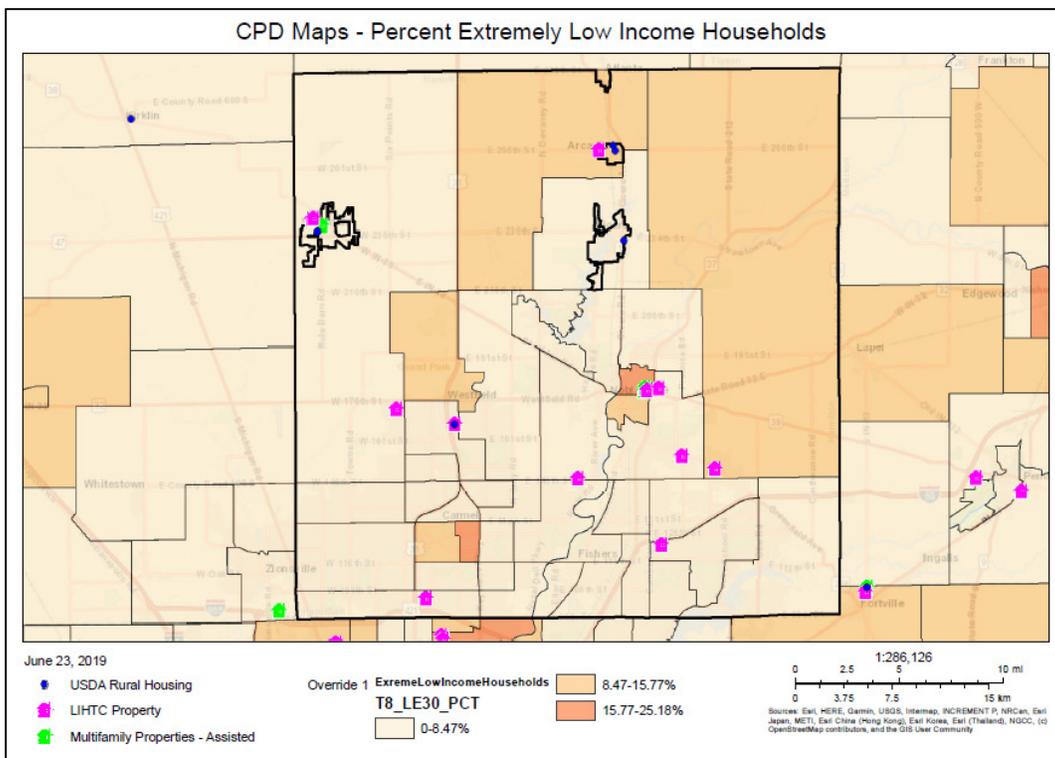
	Owners		Renters	
	Number	%	Number	%
No bedroom	34	0%	235	1%
1 bedroom	415	1%	5,483	24%
2 bedrooms	7,770	9%	9,790	44%
3 or more bedrooms	73,810	90%	6,899	31%
Total	82,029	100%	22,407	100%

Table 27 – Unit Size by Tenure

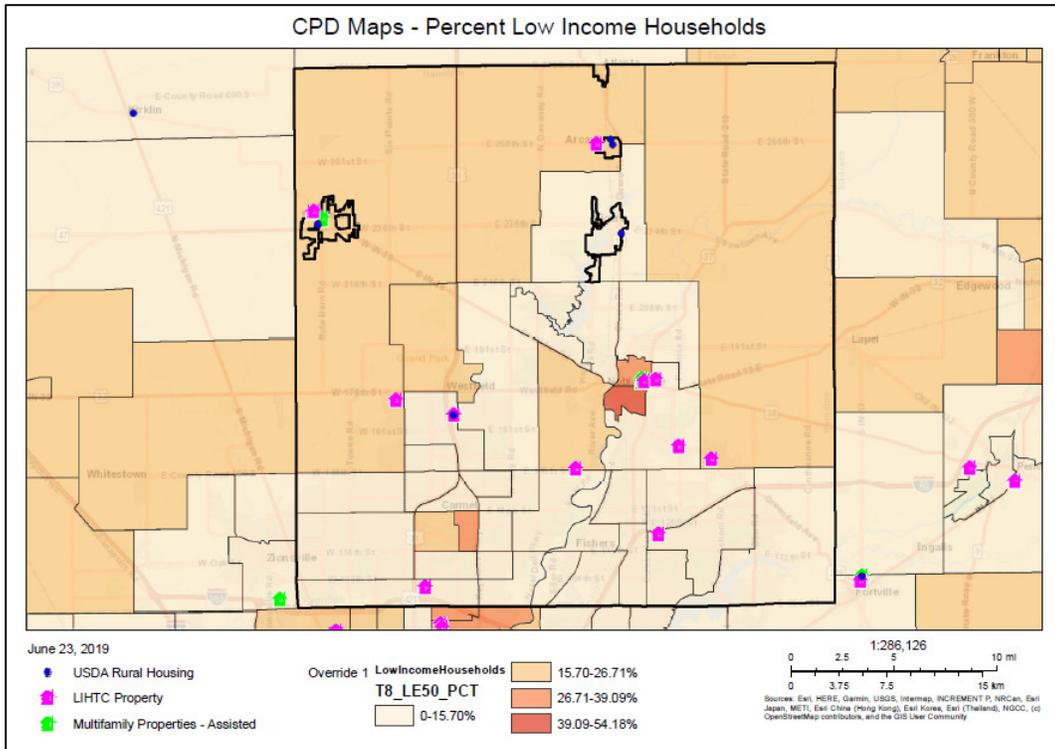
Data Source: 2011-2015 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Housing units assisted with federal, state, and local programs are divided into two categories - subsidized and affordable housing units – and consist of Section 8, United States Department of Agriculture (USDA), and Low Income Housing Tax Credit (LIHTC) properties. In the subsidized market, rents are based on income; in the affordable market rents are based on a fixed percentage of the Area Median Income (AMI). Subsidized and affordable properties generally target ELI to MI households with subsidized housing generally targeting those with the lowest incomes and LIHTC housing units targeting those with incomes of 60 percent of the AMI, or below. The following map identifies the location of these developments within the county as well as the concentration of EL and LI households.



Source: HUD, CPD Maps, June 2019



Source: HUD, CPD Maps, June 2019

According to the 2018 Housing Needs Assessment, in total there are six subsidized properties and 16 affordable properties, of which five also offer market rate units, in Hamilton County; this equates to 429 subsidized units and 1,526 affordable units, or 1,955 total units that target households with incomes at or below 80 percent of the AMI. In 2017 there were approximately 25,434 renter-occupied units in Hamilton County. Thus, the subsidized and affordable housing stock accounts for approximately 7.7 percent of the total renter-occupied housing units in the county, while approximately 67 percent of renter households in the county have incomes at or below 80 percent of the AMI, making them eligible for such units. Of the existing 16 properties, 15 offer affordable units targeting households with a variety of incomes including units at the 30, 40, 50, and 60 percent AMI levels, as well as market rate units. The majority of the units however target households with incomes of 50 and 60 percent of the AMI, or less. While households with lower incomes are legally eligible to reside in these units, oftentimes management companies set minimum income requirements in order to ensure that residents are not severely cost burdened. The majority of the subsidized and affordable housing stock targets a general tenancy. In fact, only 23 percent of subsidized units and five percent of affordable units are age-restricted units. There are no permanent supportive housing units. It is worth noting that in February 2019 a ten-unit property in Sheridan ended its project-based rental assistance contract. Half of the units were reportedly destroyed by a fire and the four existing tenants at the property at the time of the conversion were issued enhanced tenant based vouchers administered by NHA. To date, three of the four tenants continue to reside at the property using the aforementioned enhanced vouchers.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The Noblesville Housing Authority does not expect any loss of housing through Section 8 contracts.

Does the availability of housing units meet the needs of the population?

No. As previously mentioned, Hamilton County does not have public housing units. There are however six subsidized properties through Section 8 or USDA in Hamilton County offering a total of 429 rental assistance units. The following section summarizes the characteristics of the subsidized housing supply.

- Of the total 429 units, 23 percent are age-restricted and target seniors and/or households with a disability; seniors are of course permitted to reside in non-age-restricted units.
- Three of the four towns and two of the four cities have some subsidized housing units; there are no subsidized units in Fishers or Carmel. The properties in the towns and Westfield, however, are fairly small in size and as such constitute only 22 percent of the total supply collectively; 78 percent of the subsidized rental supply is in Noblesville at Noble Manor, the one Section 8 property in Hamilton County.
- According to the 2018 Hamilton County Housing Needs Assessment, subsidized units in Hamilton County were 97.4 percent occupied and properties reported consistently high occupancy rates and extensive waiting lists. All age-disability/restricted units were fully occupied.

Affordable housing units funded with federal, state, and local funds are units that benefit from programs such as CDBG, HOME, USDA (non-rental assistance), and Low Income Housing Tax Credit (LIHTC) projects. As the time of the Housing Needs Assessment, there were 16 existing stabilized properties (1,528 units) and one (40 units) development under construction in Hamilton County that offer affordable units as previously defined; seven of these are owned by one organization, HAND, Inc. The following section summarizes the characteristics of the affordable housing supply.

- Although the LIHTC properties are fairly well distributed throughout the county, albeit generally outside of the city centers, given differences in property sizes, the majority of the affordable units are in fact located in Noblesville.
- Six of the properties target seniors and the remaining ten have no age-restrictions.
- Two-bedroom units dominate the market among properties that offer affordable units followed by one and three-bedroom units.
- In 2018, Section 8 Housing Choice Voucher usage at the affordable properties ranged from eight to 83 percent, with an average of 28 percent.
- According to the 2018 Hamilton County Housing Needs Assessment, turnover ranged from five to 30 percent, with an average of 16 percent. Turnover at the senior properties was particularly low.
- According to the 2018 Hamilton County Housing Needs Assessment, the average vacancy rate for affordable units was 2.5 percent (38 vacant units) and 13 of the 16 properties reportedly maintained a waiting list.
- Rent growth at affordable properties is limited by growth in the AMI, which is based on the median family income for the Indianapolis-Carmel, IN HUD Metro Area, and market conditions.

In 2018 the AMI increased by 4.8 percent. In 2018 select LIHTC properties reported strong rent growth, which given lack of growth in the median household income in the county suggests that cost burdens for residents in these units may rise in the future.

Overall, the affordable rental market has gained or is slated to gain several new developments, indicating that new construction affordable development is financially feasible in the market. However, while both subsidized and affordable properties are scattered throughout the county, the larger properties are concentrated in the Noblesville area and very few of these units are located in Carmel, the highest price market.

Vacancy in both the subsidized and affordable markets is low and waiting lists extensive. Despite the strong demand for additional affordable housing in the market, since 2016 numerous LIHTC applications for projects in Hamilton County have failed to be competitive in the statewide LIHTC application process. At least two of these deals were on the waiting list and were offered a lesser amount of credits, but the projects were unfortunately not feasible at the lesser allocation. Blackhawk Commons, allocated in 2017, will be the first allocation in the county in the past three years. Despite the general lack of success, applications continue to be submitted for affordable LIHTC projects in the county, including in the recent 2018 (Fishers) and 2019 (Sheridan) competitive rounds, though again, neither were successful. Annually less than one percent of new housing units are affordable units. According to the consultations, the lack of additions to the affordable housing stock as well as the concentration or exclusion of subsidized and affordable units in particular markets is due to a variety of factors including, but not limited to land costs; land availability; city regulations, architectural standards, and construction fees; the not in my back yard (NIMBY) phenomenon; and remonstrance (or anticipated remonstrance) over concerns about school overcrowding and crime.

Furthermore, as demonstrated by the CHAS data analyzed in the Needs Assessment, while renter households are disproportionately likely to have a housing problem, including being cost burdened, when compared to their owner counterparts, because the vast majority of housing units are owner-occupied, the majority of households with a housing problem and who are cost burdened (on a count basis) are owner households. Further, ELI and VLI households regardless of tenure are more likely than not to be cost burdened and within these income categories renters are more likely to be both cost burdened and severely cost burdened with respect to their owner counterparts. Finally, rising housing costs have been primarily concentrated in the cities.

The anticipated population and household growth in the county coupled with rising housing costs and the relative lack of new affordable supply being added to the market, suggests that the need for affordable housing will likely continue to rise for the foreseeable future; this will be particularly critical for special needs households many of whom have low and/or fixed-incomes. Affordability is a major barrier for many residents in the county, both renters and homeowners.

Describe the need for specific types of housing:

Given demographic trends and the current state of the housing market along with trends noted through the consultation process, the following housing types are expected to be needed in Hamilton County:

- Subsidized housing units for ELI and VLI households targeting the general population, seniors, and disabled households
- Workforce housing, both rental and owner
- Affordable, design appropriate housing for seniors to allow for aging in place
- Permanent supportive housing units for special needs populations

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

This section of the Consolidated Plan assesses the cost of housing. Data from HUD covers the 2011-2015 period. Where necessary, we have supplemented this with more recent ACS data as well as with information obtained through the consultation process.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	\$208,000	\$222,900	7%
Median Contract Rent	\$777	\$871	12%

Table 28 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

The above data provided by HUD is outdated. We have therefore also included more recent data available from the ACS. According to the 2017 ACS, Hamilton County had the highest median home value (\$266,500) in the state and the value has increased significantly over the past ten years. Hamilton County also had the highest median gross rent at \$1,091.

Rent Paid	Number	%
Less than \$500	2,107	9.4%
\$500-999	12,638	56.4%
\$1,000-1,499	5,695	25.4%
\$1,500-1,999	1,349	6.0%
\$2,000 or more	605	2.7%
Total	22,394	99.9%

Table 29 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	578	No Data
50% HAMFI	2,302	1,920
80% HAMFI	9,947	10,180
100% HAMFI	No Data	17,468
Total	12,827	29,568

Table 30 – Housing Affordability

Data Source: 2011-2015 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$651	\$751	\$918	\$1,226	\$1,389
High HOME Rent	\$651	\$751	\$918	\$1,225	\$1,389
Low HOME Rent	\$651	\$750	\$900	\$1,038	\$1,158
30% LIHTC Rent Limit	\$420	\$450	\$540	\$623	\$695
60% LIHTC Rent Limit	\$840	\$900	\$1,080	\$1,246	\$1,390

Table 31 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

No. The 2011-2015 CHAS data illustrates a shortage of units for both renters and owners at all income levels. For example, according to 2011-2015 CHAS data there are 2,375 owner and 3,000 renter households with incomes below 30 percent HAMFI and there are only 578 rental units that would be affordable to this income group. There is a similar shortage for households with incomes below 50 percent of the HAMFI: 6,215 owner households but only 1,920 affordable owner units and 6,015 renter households but only 2,302 rental units affordable to this income cohort.

Additionally, according to the 2018 Hamilton County Housing Needs Assessment, by 2022 there will be a need in Hamilton County for an additional 497 rental units and 9,912 for-sale units above and beyond the supply which is recently completed or currently under construction/permitted for which information was available from city officials. The majority of the need for rental units will be in Fishers, Noblesville, and Westfield, while the majority of the need for for-sale units will be in Carmel, Fishers, and Noblesville followed by Westfield. It is worth noting that two markets in particular appear to be slated for a surplus of rental units: Carmel and Sheridan. While Carmel has experienced a significant amount of additions to the multifamily rental market in the past ten years, to date the demand appears to have maintained pace with or lagged only slightly behind the rate of construction. As a result, it is possible that the projection for an area such as Carmel which is in extremely high demand may be understated. Sheridan, on the other hand, is a rural market but one which has a limited amount of quality affordable rental supply. The units that will be added will be affordable units. As a newly constructed affordable property in a rental market dominated by older housing structures it is reasonable to assume that this property will be quickly absorbed and any surplus supply will be older properties, likely single-family classified listings, some of which may then benefit from infill redevelopment opportunities.

Additionally, while the above analysis provides projections for housing unit needs by tenure and place, it does not provide any insight into the existing housing needs of the community in particular to address the gaps between the affordable and available supply and existing households by income level. Gaps in both affordable and the affordable and available supply matter. A gap in the former indicates a lack of

supply while a gap in the latter indicates a mismatch between the targeted rent/owner cost and the household income of the occupants, a mismatch that is driven largely by higher income households occupying units that are affordable to lower income households.

Overall, the 2018 Housing Needs Assessment found that there are 27 affordable and available rental units for every 100 ELI renter households, 34 affordable and available rental units for every 100 VLI and below renter households, and 69 affordable and available units for every 100 LI and below renter households, indicating a sizeable gap in the affordable housing supply in the county. For ELI and VLI households, the gap is driven by both a lack of affordable units at the respective income levels as well as higher income households occupying the already insufficient affordable housing supply. For LI and below renter households the gap is driven exclusively by higher income households occupying the affordable housing rental supply. This occurs because the majority of the affordable rental supply in the county is not rent and income restricted, as these restricted units comprise only 7.7 percent of the rental housing stock. As a result, higher income households are eligible for these units. Overall, there is shortage of 2,205 rental units for ELI households, 3,955 rental units for VLI households and 3,465 rental units for LI households in Hamilton County. Note that the affordability analysis assesses aggregate gaps assessing need for units at or below 30 percent (ELI), at or below 50 percent (VLI), at or below 80 percent (LI), and so on. In other words, an ELI renter household with an income below 30 percent of HAMFI would also be included as a VLI renter household because the income is also below 50 percent of HAMFI.

Further, the study found that there is a shortage of affordable and available owner units at all analyzed income levels. The need is particularly high on a count basis for MI owner households, with a shortage of 6,700 units. In terms of need on a per household basis, however, the need is greatest among VLI and below owner households where there are only 40 units for every 100 households in this income category. The shortages at all levels are driven exclusively by higher income households occupying units that are affordable to households with lower incomes. For example, only 21 percent of owner units affordable for VLI and below owner households are in fact available to these households; the remaining 79 percent are occupied by owner households with higher incomes. Further, approximately 66 percent of units affordable for LI, VLI, and ELI owner households are occupied by owner households with incomes above 100 percent of HAMFI.

Finally, the study conducted an affordability analysis by employment, tenure, and place. The results of that analysis indicate that single-earner renter households in the majority of occupations were at risk of being cost-burdened. By contrast, adding a second earner to the renter household vastly increased the affordable housing options within the county for renter households. Additionally, while smaller families with dual-earners could generally avoid being cost burdened in most rental markets in Hamilton County, any family needing three or more bedrooms would likely be at risk of being cost burdened in most markets.

New home prices were likely to be unaffordable to a one-earner household for any occupation. Existing homes were more likely to be affordable but only for select occupations in select markets. Having a second earner in the household opened the door to significantly more affordable home purchase

options in Hamilton County. In particular, new homes were likely to be affordable to dual-earner households with occupations in the top third of the distribution in all markets and existing homes are likely to be affordable to dual-earner households with occupations in the top third of the distribution in Carmel, the top half of the distribution in Fishers and Westfield, and the top two thirds in Cicero and Westfield. Despite additional opportunities that were available by having a second earner, for some occupations even having a second earner did not provide affordable access to the Hamilton County housing market. For example, for a dual-earner household both of whom work in protective services (police or fire), with the exception of an existing home in Cicero and Sheridan, affordable homeownership is not accessible in Hamilton County.

How is affordability of housing likely to change considering changes to home values and/or rents?

In 2011-2015 there were a total of 113,759 housing units in Hamilton County. Of those, 113,759 were occupied: 84,762 by owner households and 23,491 by renter households. During this time, 29,568 (35 percent) of owner housing units and 12,827 (55 percent) of rental units were affordable to owner households with 100 percent of the HUD adjusted median family income (HAMFI). The vast majority of these units however are for households with 80 to 100 percent of HAMFI; significantly fewer units are affordable at the 30 and 50 percent HAMFI levels.

Hamilton County has the highest median home value (\$266,500 in 2017) in the state and the value has increased significantly over the past ten years. Hamilton County also has the highest median contract rent in the state. The average median home value from 2008 to 2012 was \$214,400 compared to \$240,000 from 2013 to 2017, a statistically significant increase. Meanwhile the average median household income has remained relative stable – an average of \$90,647 from 2008 to 2012 compared to \$90,582 from 2013 to 2017 (in 2017 inflation dollars). Rising housing costs coupled with stagnant incomes and limited public and private funding and action to add affordable housing units to the market suggest that affordability problems are likely to increase both in terms of magnitude at the individual/household level and scope at the county level. Residents who have lived in Hamilton County all their lives suddenly find themselves unable to afford housing or other amenities around them, pushing them further away from the developed core of the cities in Hamilton County or to other communities outside of Hamilton County. Additionally, through the consultation process it was discovered that seniors looking to downsize are having a difficult time finding an affordable option and as a result many seniors in the county are remaining in their older, larger homes thereby limiting the number of starter home options for younger households.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

In general, the FMR for an area is the amount that would be needed to pay the rent and utilities of a privately owned, decent and safe rental housing unit of a modest nature with suitable amenities. FMRs are used to determine payment standards for the Section 8 Housing Choice Voucher program. HOME and LIHTC rents are limits set by HUD for an area to ensure affordability of rental units. HOME rents are

the lesser of the FMR or a rent that does not exceed 30 percent of the adjusted income of a family whose income equals 65 percent of the median income for the area, as determined by HUD, with adjustments for the number of bedrooms in the unit. LIHTC rents are set at 30 percent of the income of the AMI tied to the unit assuming a family size of 1.5 persons per bedroom.

Historically FMRs were set at the MSA or county level. In November 2016, HUD implemented a new rule to expand the use of Small Area Fair Market Rents (SAFMRs), which set voucher payment standards at the neighborhood (defined as zip code) level rather than the metro level with the goal of expanding access to higher rent markets. As of May 2018, 24 metropolitan areas are required to use SAFMRs. The Indianapolis metro area is not one of the required areas and as such agencies within this area have the flexibility to set payment standards in high cost areas based on SAFMRs without HUD approval or can request HUD approval to apply the SAFMRs throughout their entire service area. According to the 2018 Hamilton County Housing Needs Assessment, the SAFMRs for Fishers and Carmel are generally well above the county-wide FMRs and above the 110 percent of FMR threshold set by the NHA for the Section 8 Housing Choice Voucher program. This indicates that voucher holders in the county will likely have difficulty securing an affordable rental unit in these areas of the county.

Additionally, in Hamilton County, the AMI rents are generally significantly higher than the HOME and FMR rents. This can also create a challenge for voucher tenants and the NHA as the majority of the private market rate housing stock does not accept Section 8 Housing Choice Vouchers thereby limiting the potential housing supply for voucher tenants to LIHTC properties. If the LIHTC properties charge the maximum allowable rents, then these units may also be outside the reach of affordability for voucher holders.

The above trends suggest an increased difficulty for the NHA as it attempts to balance rising demand for rental assistance with finite, or in some years declining, resources. Even with the payment standards set at 110 percent of the FMRs, select areas of the county will continue to be inaccessible to voucher holders thereby further concentrating these households within the already more affordable areas of the county. As previously mentioned, housing costs are increasing at faster rates than incomes in the county. As housing construction and rehabilitation costs rise, it will be increasingly difficult to produce much needed affordable housing.

The CDBG program will seek to incentivize the development of housing units affordable to extremely low income households and low-income households to meet the demand of current residents who are, or are at-risk of being cost burdened. Additionally, groups such as HAND and Habitat for Humanity of Hamilton County will be encouraged and supported in their development of affordable rental and owner-occupied housing in Hamilton County.

Discussion

Many sections of this document confirm that housing, while plentiful in Hamilton County, is not affordable to all who live and/or work there. Additionally, over the past ten years, housing costs in

Hamilton County have increased while median incomes have remained stable. This suggests that housing is becoming more unaffordable. The goals of this Consolidated Plan will have to address this need as a high priority. Both owner and renter ELI to LI households are living with cost burdens because the supply of affordable housing for these households is extremely limited and much of the supply that exists is occupied by higher income households. Incentives for developers and funding projects that address this specific need can help to reduce the economic insecurity of these cost-burdened households. Additionally, incentivizing and encouraging the development of affordable owner options for seniors looking to downsize could have a two-fold impact: first, provide seniors with affordable housing and second, release some of the older, larger housing stock to younger families looking for affordable starter homes.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

The following section provides an overview on the condition of housing in Hamilton County.

Definitions

Standard Condition: No major structural defects; adequate plumbing and kitchen facilities; appearance which does not create a blighting influence; and the house meets local standards and building codes, including lead-based paint clearance.

Substandard Condition but Suitable for Rehabilitation: Any unit will be considered substandard condition but suitable for rehabilitation if the renovation costs for the unit do not exceed the value of the property: land and buildings combined value.

Housing Conditions: Condition of units is assessed using the same criteria as in the Needs Assessment. This includes: 1) lacks complete plumbing facilities, 2) lacks complete kitchen facilities, 3) more than one person per room, 4) cost burden (amount of income allocated to housing) is greater than 30%, and 5) complies with applicable building code standards.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	13,325	16%	7,960	36%
With two selected Conditions	65	0%	460	2%
With three selected Conditions	4	0%	10	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	68,645	84%	13,980	62%
<i>Total</i>	<i>82,039</i>	<i>100%</i>	<i>22,410</i>	<i>100%</i>

Table 32 - Condition of Units

Data Source: 2011-2015 ACS

Condition of Housing Discussion

On the whole, most housing units in Hamilton County have *no* housing conditions, meaning there are no adverse housing conditions. In Hamilton County, 84 percent of owner occupied housing units have no housing conditions and 62 percent of renter occupied homes have no housing conditions. As illustrated, of housing units that have a housing condition, the majority have just one of the aforementioned housing conditions. As indicated in the Needs Assessment, the majority of households with a housing problem in the county have the fourth identified condition – cost burden.

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	32,864	40%	8,295	37%
1980-1999	32,320	39%	8,000	36%
1950-1979	13,905	17%	4,744	21%
Before 1950	2,968	4%	1,360	6%
Total	82,057	100%	22,399	100%

Table 33 – Year Unit Built

Data Source: 2011-2015 CHAS

Much of Hamilton County has been developed as part of urban sprawl in the Metropolitan Indianapolis Area. According to the 2017 ACS, over half (52.4 percent) of the housing stock was built between 1990 and 2009 and an additional 14.5 percent built between 2010 and 2017. Approximately 8.9 percent of the housing stock was built prior to 1960 and may be in a state of disrepair.

Housing development has continued to be robust throughout the last decade slowing only during the Great Recession in 2008 and 2009. From 2000 to 2017 Hamilton County averaged 3,351 residential building permits per year. Additionally, according to building permit data detached single-family and duplex construction dominate the Hamilton County real estate market. While there appears to have been a significant increase in large multifamily construction from 2013 to 2015, this boom does appear to have subsided somewhat in recent years. It is worth noting that although there has been a construction boom in Hamilton County in the past decade, very few of the units added were affordable units. In fact, according to a Fair Housing complaint filed against the county, “since 2011, more than 11,000 housing units have been developed in Hamilton County, about the same amount as built in Marion, Lake and Allen counties combined... In that time frame, those counties received low-income housing tax credits for nearly 3,000 units total. Hamilton County has been awarded none.”

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	16,873	21%	6,104	27%
Housing Units build before 1980 with children present	18,394	22%	15,654	70%

Table 34 – Risk of Lead-Based Paint

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Lead Paint Hazard Discussion

The age of the housing unit will tell a household if there is a risk for lead based paint poisoning. Lead paint was banned in 1977 by the U.S. government’s Consumer Product Safety Commission (CPSC), although it was not used frequently in residential buildings after the 1960s. Homes built up to 1978 have some risk for lead based paint hazards, although most homes must have been built prior to 1960 to

be at high risk for lead based paint hazards. Lead based paint hazards are paint chips, which you can see, and lead dust, which you can't always see. The only way to determine if you have lead paint hazards is to test the home.

A total of 4,328 housing units (4.1 percent of the housing supply) in Hamilton County were built prior to 1950. According to the EPA, professional lead-based paint removal costs \$8 to \$15 per square foot or on average approximately \$10,000. Based on the number of the pre-1950 housing units, at an estimated \$10,000 per housing unit to remove the lead based paint hazards, the total financial burden to abate lead paint hazards is approximately \$43,280,000. Also of note is the sizeable percentage of rental units built before 1980 (at-risk housing units) with children present.

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. According to the 2017 Childhood Lead Surveillance Report released by the Indiana Department of Health, 1,903 children in Hamilton County were tested for lead-based paint issues and of those six had elevated test results.

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 35 - Vacant Units

Need for Owner and Rental Rehabilitation

Older housing typically requires more continual maintenance. In the absence of routine maintenance, older housing can quickly become substandard. The typical economic life for newly constructed residential uses is between 50 and 60 years. The age of the housing stock in Hamilton County is younger than that of the U.S. as a whole.

While the owner housing stock is slightly newer than the rental housing stock, with four percent of the owner stock and six percent of the rental stock built prior to 1950, both owner and rental units may require rehabilitation from normal wear and tear as well as lead based paint remediation.

On the whole, most housing units in Hamilton County have **no** housing conditions. In Hamilton County, 84 percent of owner occupied housing units have no housing conditions and 62 percent of renter

occupied homes have no housing conditions. As illustrated, of housing units that have a housing condition, the majority have just one of the aforementioned housing conditions. As indicated in the Needs Assessment, the majority of households with a housing problem in the county have the fourth identified condition – cost burden, which is a reflection of the occupant of the housing unit not the physical condition of the housing unit.

When budgets are stressed, households are less able to plan for crisis or retirement and can then be at-risk of foreclosure or defer home maintenance, which negatively affects the quality of life of the occupant as well as the neighborhood as a whole. Oftentimes the deterioration of the condition of homes is a result of a combination of age and normal wear and tear as well as deferred maintenance, the latter of which occurs when households are cost burdened and/or shift from being wage-earners to living on a fixed-income.

While the above discussion provides some insight into the potential need from a housing unit perspective for home repairs, it does not indicate as to whether the households that occupy these older units are low to moderate households. According to RealtyTrac.com, the foreclosure rate, an indicator of potential income-based need, in Hamilton County is one in every 4,507 housing units. Within the county, the highest foreclosure rates are in Fishers (1 in every 2,616 housing units), Cicero (1 in every 2,815 housing units), and Noblesville (1 in every 4,765 housing units), though Noblesville's foreclosure rate is below the countywide average.

The consultation process confirms these needs, with a particularly heavy emphasis placed on home repair for senior citizens and low-income individuals and families. Providing opportunities to improve the quality of life for these households and assist them with repairs to their home can greatly reduce this risk. Hamilton County recently created the Hamilton County Home Repair Partnership, a collaborative effort between local affordable housing developers and service providers to ensure that low and moderate income homeowners are able to continue living safely in their existing homes and to improve accessibility and efficiency of the homes. In their first year of operation (2018), the partnership completed 49 home repairs ranging in cost from \$8.47 to \$8,847.55 with an average of \$538.88. While there is not currently a waiting list for the service, the partnership and service are relatively new and demand is expected to increase with time.

Overall, while the need for home repairs is likely countywide, assistance may be targeted to Fishers, Cicero, and Noblesville where foreclosure rates are higher within the county. Additionally, home repairs should be targeted towards seniors and other special needs households with fixed or low-incomes.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

A total of 4,328 housing units including 2,968 owner units and 1,360 rental units in Hamilton County were built prior to 1950; these homes are at high risk for lead based paint hazards. Information is not available as to whether these households are occupied by low to moderate income families. If we

assume that low to moderate income households are evenly distributed within the housing stock, then we estimate that approximately 527 owner and 649 rental housing units with lead-based paint hazards may be occupied by low to moderate income households.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

There are no public housing units in Hamilton County.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available				189	354	189	0	0	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 36 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

There are no public housing units in Hamilton County. The NHA manages 189 Housing Choice Vouchers and there are an additional 354 project-based units in the county that are managed by private entities.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 37 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

There are no public housing units in Hamilton County.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

There are no public housing units in Hamilton County.

The NHA facilitated the beginning of the Hamilton County Area Neighborhood Development organization, a non-profit organization with the mission to *invest in neighborhoods, providing housing solutions, and building partnerships to improve the lives and build community in Hamilton County*. Since its formation, HAND has developed seven affordable rental housing properties in Hamilton County. HAND is also one of the partner organizations that oversees the Home Repair Program in Hamilton County. In 2018, the first year of the partnership, the partnership completed 49 home repairs with costs ranging from \$10 to \$9,000. The NHA supports developments by HAND or other private developers with local Community Development Block Grant dollars.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

This section of the plan identifies homeless facilities and services currently available in Hamilton County.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	0	0	4	0	0
Households with Only Adults	50	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 38 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Hamilton County has one emergency shelter for single individuals, a small number of transitional housing beds for families, and a service agreement for victims of domestic violence to be sheltered in neighboring Anderson. Each of these facilities offers some form of service as well. For example,

- Third Phase, the primary emergency shelter in the county, also offers a food pantry and thrift store. The food pantry provides food for shelter residents as well as emergency food for members of the general public (up to once every 30 days). The thrift store provides clothing and household supplies for shelter residents as well as emergency supplies for members of the general public with a referral letter from the Hamilton County Trustee's office. Shelter residents receive additional clothing and household supplies upon leaving the shelter.
- Family Promise of Hamilton County works through a collaboration of local churches to provide temporary housing, meals, and transportation as well as mentoring for at-risk families, teaching financial literacy, and helping parents find jobs and affordable housing for their family.
- Merciful H.E.L.P. Center a food pantry, as well as essential furniture and houseware needs and/or a vehicle to help the individual re-enter the workforce. The organization also assists with down payments as well as utilities.
- Alternatives, Inc. of Madison County offers a variety of services to victims of domestic violence including housing assistance (transitional housing, relocation services, and transportation assistance) emergency assistance (emergency shelter, emergency local transportation, safety planning, case management, food and clothing, domestic violence education, crisis intervention services, etc.), legal and financial assistance, counseling services, support services, childcare assistance, and community education services. Although these services are not targeted toward the general homeless population, they are targeted towards a special needs population many of whom are/become homeless as a result of being a victim of domestic violence and as such are included here as well as in the special needs discussion.

In addition to services that targeted towards the homeless, there are additional service providers that provide services to a wider range of individuals/households some of whom are homeless. Many of these services are targeted to low and moderate income individuals and families in order to prevent homelessness, but from which homeless individuals and families can also benefit. For example,

- According to the State of Indiana Community Development and Housing Authority, Aspire Indiana, Inc., based in Noblesville is the primary service provider to those living with a mental health disability. Aspire Indiana, Inc. offers a variety of programming, including housing services, inpatient services, outpatient services, skill development, and social enterprise services

to create jobs for persons with disabilities. These services are available to all individuals with a mental health disability, not only the homeless.

- Noblesville First United Methodist offers the “Dinner’s On Us” program, a free weekly meal.
- The GSN also offers services to at-risk and underserved individuals in Hamilton County when individuals have nowhere else to turn. Currently the GSN network consists of 268 agencies, 280 churches, 43 food pantries, 69 schools, and five hospitals. According to GSN, this oftentimes involves individuals in some form of emergency or in need of crisis intervention. Meeting these needs typically includes providing housing and utility assistance, food assistance, car repairs, household items, financial/medical assistance, education/life skills, etc. These forms of assistance are provided through an application process and are supported by donations and grants secured by the GSN. To qualify for direct assistance the applicant must:
 - be a resident of Hamilton County,
 - have a letter of referral or denial from your specific township trustee, and
 - provide other select documents as may be required in order to apply for specific types of financial assistance.

There are also restrictions on select programs.

- Rental assistance is available for one month of current or past due rent, or for the first month’s rent in a new home/apartment. Payments of late fees and/or deposits are not available. Rental assistance is only available once within a 12-month period, per household, as long as resources last.
- Utility assistance is available for one month of current or past due utility bill, up to \$200, which may or may not be the amount needed to restore service. Payment of late fees and/or deposits are not available. Assistance is only available once within a 12-month period, per household. During the winter season each household can also apply for the Low Income Home Energy Assistance program (LIHEAP), which provides one-time assistance to families and individuals with the cost of their primary source of heat. The program ended in May; it is expected to start again in November.

Additionally, one of the primary direct services provided by the GSH is holiday meals (Thanksgiving and Christmas) whereby nearly 26,000 people annually are assisted with food, clothing, and other gifts. Other forms of assistance that are advertised by the GSN include: free pet food Wednesdays, baby pantries, clothing/household pantries, kids coats, and mobile food distribution services.

- Noblesville First United Methodist offers the “Dinner’s On Us” program, a free weekly meal.

- The HOPE Family Care Clinic provides medical services to the uninsured, under-insured, or medically under-served in Hamilton County. Services provided include medical care for adults and children, flu shot clinic, adult physicals, school and sports physicals, assistance with social services, well-child exams and checkups, Christ-centered counseling for individuals and families, patient assistance with medications, and ACUTE dental services for ages 12 and over.
- The Trinity Free Clinic provides healthcare services to the uninsured and underinsured low-income residents of Hamilton County. Services provided include adult medical clinic, pediatric clinic, eye clinic, foot care clinic, asthma and allergy clinic, women’s health clinic, and acute dental clinic. Medical services are available on a first come, first serve basis on Saturday mornings. Dental services are available on Saturdays by appointment.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

According to the 2018 Hamilton County Housing Needs Assessment, in 2017, approximately 1,644 requests were made to Township Trustees for assistance and a total of 804 households were provided with some form of assistance. The vast majority of the assistance provided in each township was for housing related costs, including utility assistance. There was also a significant number of emergency shelter nights (797 nights) provided (both with and without township funds); the vast majority of these were provided in Washington Township. Township Trustees referred these at-risk of homelessness households to a variety of service providers throughout the county including the Salvation Army, St. Vincent DePaul, Aspire, Prevail, Third Phase, The Good Samaritan Network, the Noblesville Housing Authority, Merciful Help, and the Wheeler Mission (located in Indianapolis).

Emergency Solutions Grant Rapid Rehousing and Homeless Prevention funds in Hamilton County are administered by Aspire Indiana, Inc., a private non-profit organization, in coordination with the CoC. Aspire Indiana, Inc. serves Hamilton, Boone, Hendricks, Madison, and Hancock Counties. According to the Indiana Housing and Community Development Authority, Aspire Indiana, Inc. was awarded \$75,000 in ESG funds in 2018 of which ten percent went towards Homeless Prevention. The percent of funds spent on Hamilton County residents versus residents of the other two counties was unavailable. The 2019 awards have not yet been announced.

The primary shelter for Hamilton County is Third Phase, which is located south of Noblesville. Third Phase serves as a last option for Hamilton County residents before they turn to services or other shelters in Indianapolis. Third Phase provides shelter to up to 50 single men and single women at any given time for up to 30 days; the shelter does not currently accommodate families. Shelter residents are given daily tasks to assist in maintaining the facility. Third Phase also offers a food pantry and thrift store. The food pantry provides food for shelter residents as well as emergency food for members of the general public

(up to once every 30 days). The thrift store provides clothing and household supplies for shelter residents as well as emergency supplies for members of the general public with a referral letter from the Hamilton County Trustee's office. Shelter residents receive additional clothing and household supplies upon leaving the shelter.

As previously mentioned, there is no formal emergency shelter or transitional housing for families in Hamilton County. In May 2019, Family Promise of Hamilton County was formed and began working to fill this gap by providing assistance to families experiencing homelessness. The organization is a non-profit organization that works through a collaboration of local faith based congregations to provide temporary housing, meals, and transportation as well as mentoring for at-risk families, teaching financial literacy, and helping parents find jobs and affordable housing for their family. According to Family Promise of Hamilton County, every month approximately 200 families in Hamilton County receive eviction notices and there is no shelter in Hamilton County for families, and shelters in neighboring municipalities are oftentimes at maximum capacity. As a result, many of these families end up sleeping in a car, couch-surfing with family or friends, or depleting any savings at extended stay motels. While the organization does not provide emergency shelter, it does provide temporary housing for families of up to 90 days with a one-time extension under special circumstances. The organization can currently serve four families at one time and expects to serve a total of 12 to 15 families in 2019 and 20 to 24 families in 2020. The majority of the requests received to date have however been for immediate emergency assistance, either financial to assist with the cost of temporary housing in a motel, or emergency shelter for families and this is not a service that is provided by the organization.

While there are no domestic violence shelters located within Hamilton County, victims of domestic violence are oftentimes referred to Alternatives, Inc. of Madison County, which operates a domestic violence shelter in Anderson, which is located approximately 25 east of Hamilton County. Alternatives currently serves a six-county area including Hamilton, Hancock, Henry, Madison, Marion, and Tipton. According to Alternatives' 2018 Annual Report, 547 clients were served and a total of 7,580 safe nights provided in 2018. Of these, 51 were from Hamilton County; this was a significant increase from the two previous years during which 22 to 23 clients were provided shelter.

There are also a series of other houses of worship throughout the county that provide assistance including temporary shelter to those in need. For example, the Merciful H.E.L.P. Center is a social enterprise of Our Lady of Mount Carmel Church in Carmel, which offers assistance to parishioners to stay in their homes by providing assistance in filing for government aid and assisting financially through periods of unemployment. In 2010 the center established a program to help families re-establish themselves after having been homeless. Services include providing housing as well as essential furniture and houseware needs and/or a vehicle to help the individual re-enter the workforce. The organization also assists with down payments as well as utilities.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

This section discusses the non-homeless special needs facilities and services. Special needs groups are defined as the elderly, frail elderly, persons with mental, physical, and/or developmental disabilities; persons with alcohol or other drug addiction; persons with HIV/AIDS and their families; and victims of domestic violence, sexual assault, dating violence, and stalking. Additionally, many of these non-homeless special needs individuals and families are also extremely low to moderate income households.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

The Good Samaritan Network has a master list of service provider organizations operating in the county. The list was not available for the purposes of this Plan. We have instead relied on a variety of other sources to identify service providers including the following: United Way's Connect 2 Help 211, referrals and resources made by Township Trustee offices, collaborative partners identified in the one-on-one consultations, and pre-existing lists of service providers included in previous county reports.

The needs of the elderly and frail elderly include affordable housing options including subsidized and low to moderate income rental units and owner units as well as assistance with home repairs, food, transportation, and case management. The Shepherd's Center, PrimeLife Enrichment, Meals on Wheels, the Central Indiana Coalition on Aging, the Hamilton County Council on Aging, the Hamilton County Division of Family Resources, and the Township Trustee offices all assist in meeting these needs.

The needs of disabled individuals and families include affordable housing and permanent supportive housing in particular as well as assistance with food, transportation, and case management. Janus Developmental Services, Inc., Meals on Wheels, the Hamilton County Council on Aging, and the Hamilton County Division of Family Resources, and the Township Trustee offices assist in meeting these needs.

The needs of victims of domestic violence include housing, transportation, and childcare assistance as well as case management. Alternatives of Madison County, Inc. and Prevail, Inc. assist in meeting these needs.

The needs of persons with alcohol or other drug additions include substance abuse treatment facilities as well as case management. While there are no facilities in Hamilton County, Aspire Indiana, Inc. does assist with meeting other needs. People seeking services not offered as Aspire Indiana, Inc. will need to travel to either Madison County or Marion County. However, the majority of demand can be met in Marion County, Indianapolis.

The needs of persons with HIV/AIDS and their families include case management and advocacy. Aspire Indiana, Inc. assists in meeting these needs. People seeking services not offered as Aspire Indiana, Inc. will need to travel to either Madison County or Marion County. However, the majority of demand can be met in Marion County, Indianapolis.

In addition to each of the aforementioned targeted service providers, the Salvation Army, Noblesville Society of Saint Vincent De Paul, United Way 211, and Township Trustee offices all assist in meeting the needs of the general population of individuals and families in need in Hamilton County.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Hamilton County has no formal discharge policy from public institutions; however, the Region 8 Planning Council, which includes Hamilton County, follows the state of Indiana policies.

Foster Care:

Each state must write a Chafee Plan outlining the state's plan to implement the Foster Care Independence Act of 1999 (FCIA), which is designed to assist young people transitioning out of foster care into stable independent housing. The State of Indiana's Plan provides youth ages 14-18 with independent living services, preparing them to live as healthy, productive and responsible lives as self-sufficient adults. Each youth has a comprehensive independent living assessment, which identifies strengths and areas for improvement. Services are geared to assist the youth in areas needing improvement. Services include financial, housing, mentoring, counseling, employment, education and other appropriate support.

Health Care:

The following is the discharge policy plan concerning those with developmental disabilities from health facilities operated by the state of Indiana:

It is the policy of the Bureau of Quality Improvement Services that all individuals moving from State Operated Facilities, Large Private ICF/MR settings and nursing homes be monitored to assure that the transition is proceeding smoothly, that the individuals' Individualized Support Plan is being implemented appropriately, and that any concerns that occur during the transition are dealt with quickly. Individuals transitioning from a state operated facility are surveyed six months after the post transition process is completed, using the residential services and supports survey instrument. Additionally, tracking/monitoring of specialty evaluations occurring during the transition process is performed for individuals transitioning from State Operated Facilities.

Mental Health:

Formal protocol has been implemented for individuals being discharged from state institutions of care under statute: IC-12-21-2-3. Other protocols are being developed for each individual Community Mental Health Center in Indianapolis. The Indiana Family and Social Services Administration and the Division of Mental Health and Addictions implemented their policy in October 2003. The policy directs that it is the responsibility of the Gatekeeper to develop a discharge plan and to assure that no person leaving a state-operated institution will be discharged to homelessness. The state operated facility staff develops the discharge plan and consumer participation in development of the plan is documented. This policy applies to patients who are transferred to or discharged from a state institution administered by the Division of Mental Health.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Over the next year, Hamilton County will provide CDBG funding to agencies that assist the special needs populations including the following:

- Family Promise of Hamilton County will receive funding to provide case management and program services
- Good Samaritan Network will receive funding to provide emergency rent/utility assistance
- Hamilton County Harvest Food Bank will receive funding to provide for a coordinator for the Meals for Kids program
- Hope Family Care Center will receive funding for its health screenings program
- Meals on Wheels will receive funding for its Sponsor-A-Senior program
- Prevail, Inc. will receive funding for a domestic violence self-sufficiency advocate and support advocate
- Shepherd's Center will receive funding for an admin for its Community Caring Program
- Trinity Free Clinic will receive funding for its Acute Dental Services program

Additionally, Hamilton County will issue an RFP for transportation services.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

While barriers to affordable housing can come from anywhere, the U.S. Department of Housing and Urban Development (HUD) recognizes universal barriers. Local and state regulations on zoning and building are often the most recognized barriers to affordable housing.

On June 21, 2017, Fair Housing Center of Central Indiana, Inc. (FHCCI) filed a complaint against Hamilton County, Indiana (CDBG recipient) and the City of Noblesville, Indiana (CDBG sub-recipient) with HUD. The complaint alleges that the City of Noblesville violated the Fair Housing Act by implementing two municipal zoning ordinances that discriminate on the basis of familial status, race and national origin. Additionally, the complaint was filed under Title VI of the Civil Rights Act on the basis of race and national origin. The complaint was brought against both the city and the county, but Hamilton County, as the grantee, has the ultimate responsibility for compliance of its sub-grantees, which in this case was the City of Noblesville. According to the complaint, in 2015 the City of Noblesville was awarded \$95,334 in CDBG funds for public infrastructure improvements, namely 2,575 linear feet of sidewalk on Pleasant and Walnut Streets. The complaint indicates that while the 2016 Analysis of Impediments to Fair Housing for Fair Housing “did not find any regulatory impediments to fair housing choice”, that there were in fact two ordinances passed in Noblesville, one in 2008 and one in 2013, that the complainant claims do just that. The 2008 ordinance prohibits rent subsidies to be sought or accepted from any federal, state, or local government and the 2013 ordinance explicitly prohibits subsidized housing.

The parties have since entered into a Voluntary Compliance Agreement on October 8, 2018. As part of the agreement, Hamilton County will convene a Working Group, headed by the Noblesville Housing Authority (in its capacity as administrator of Recipient’s community development funds), and comprised of subrecipient officials (or their designees), township trustees (or their designees), HAND, Inc., and other organizations or government officials that may be deemed appropriate.” The requirements of the Working Group are included in the full settlement agreement which is attached to this Consolidated Plan. The aforementioned ordinances were amended on June 25, 2019.

In addition to the aforementioned regulatory barriers, the consultation process identified several additional barriers to the development of affordable. These include:

- Inadequate supply of affordable housing suggests a history of barriers to new development
- High costs of property acquisition near amenities in the more developed communities of Hamilton County, such as Carmel, Fishers, Noblesville and Westfield
- City architectural standards
- A limited supply of housing units where a Section 8 Housing Choice Vouchers can be used
- A lack of transportation where creation of affordable housing development is less of a financial challenge

- A lack of amenities such as grocery stores in areas where there is less opposition to affordable housing which subsequently renders these locations uncompetitive for LIHTC funds from the state.
- Insufficient state and federal resources for affordable housing programs
- NIMBY-ism (Not-in-my-back-yard)

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

This section describes the local workforce, the nature of current employment, and activities that coordinate economic development activities across local and regional agencies.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	584	1,015	0	1	0
Arts, Entertainment, Accommodations	13,584	15,153	11	12	2
Construction	5,581	7,367	4	6	2
Education and Health Care Services	22,132	18,839	17	15	-2
Finance, Insurance, and Real Estate	12,298	17,235	10	14	4
Information	3,264	2,794	3	2	0
Manufacturing	14,184	5,984	11	5	-6
Other Services	4,483	4,175	3	3	0
Professional, Scientific, Management Services	14,822	14,090	12	11	0
Public Administration	0	0	0	0	0
Retail Trade	14,990	17,330	12	14	2
Transportation and Warehousing	3,989	1,111	3	1	-2
Wholesale Trade	7,835	7,639	6	6	0
Total	117,746	112,732	--	--	--

Table 39 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	155,847
Civilian Employed Population 16 years and over	149,395
Unemployment Rate	4.13
Unemployment Rate for Ages 16-24	12.16
Unemployment Rate for Ages 25-65	2.79

Table 40 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	53,635
Farming, fisheries and forestry occupations	5,638
Service	9,905
Sales and office	38,900
Construction, extraction, maintenance and repair	6,910
Production, transportation and material moving	4,855

Table 41 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	78,855	57%
30-59 Minutes	52,420	38%
60 or More Minutes	6,910	5%
Total	138,185	100%

Table 42 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	2,755	129	1,675
High school graduate (includes equivalency)	14,350	835	4,705
Some college or Associate's degree	29,520	1,405	6,079

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	80,845	1,980	11,850

Table 43 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	85	190	362	595	775
9th to 12th grade, no diploma	3,380	905	943	1,560	1,408
High school graduate, GED, or alternative	4,999	3,890	4,059	12,010	7,935
Some college, no degree	5,605	6,000	6,810	13,660	5,980
Associate's degree	1,055	2,274	3,109	5,280	1,438
Bachelor's degree	3,625	16,385	19,039	25,790	5,670
Graduate or professional degree	265	6,643	11,000	15,855	4,925

Table 44 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	354,924
High school graduate (includes equivalency)	529,370
Some college or Associate's degree	711,571
Bachelor's degree	1,024,871
Graduate or professional degree	1,154,433

Table 45 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Employment among persons living in Hamilton County is concentrated in the healthcare/social assistance, manufacturing, professional/scientific/technology services, and retail trade sectors.

Compared to the nation, the professional/scientific/technology services, and finance/insurance sectors are particularly overrepresented in the county. Conversely, Hamilton County is underrepresented compared to the state in the accommodation/food services and construction sectors. The below average representation of the construction industry is particularly noteworthy given that Hamilton County is the fastest growing county in the state.

Describe the workforce and infrastructure needs of the business community:

Hamilton County currently has one of the lowest unemployment rates in the state (2.7 percent; ranked 81st). Economists generally agree that full employment, or the natural rate of unemployment, ranges from four to five percent. When unemployment dips below this rate of full employment, employer competition for employees puts an upward pressure on wages and depending on the speed and breadth of this pressure, can lead to an increase in inflation. According to a recent article (July 6, 2018) on Bloomberg.com titled “Full Employment”, the relationship between unemployment and inflation is more complicated following the recent recession as we have yet to see the upward pressure on wages that one might expect given the low unemployment rate. Interviews with local stakeholders indicate some upward pressure on wages locally, but the magnitude of the increase varies depending on sector and the targeted labor market.

The low unemployment rate is attributed to a variety of factors including, but not limited to, the lack of affordable housing options in the county. According to the 2018 Hamilton County Housing Needs Assessment, of workers in Hamilton County who earn \$1,250 per month or less in 2015, 63.3 percent live outside of the county. Further, of workers in Hamilton County that earn \$1,251 to \$3,333 per month, 68.6 percent live outside of the county. The inflow percentage of workers at these wage levels are higher than the inflow of workers in Hamilton County that earn more than \$3,333 per month, the highest wage category. Additionally, both the percentage and number of individuals employed in low-wage jobs in Hamilton County but living elsewhere has increased at a faster pace than low-wage workers who both live and work in Hamilton County or low-wage workers who live in Hamilton County but work outside. Further, approximately 45 percent of workers who earn \$1,250 per month or less in Hamilton County commute less than ten miles followed by those that commute ten to 24 miles; there is also a significant minority (18.7 percent) who commute more than 50 miles to get home. Being located so far from one’s source of employment is risky, particularly for low to moderate-income households many of whom are also transportation disadvantaged.

Hamilton County does not offer fixed-service public transportation. The county does have the Hamilton County Express, which is run by Janus Developmental Services, Inc. and is a shared-ride public transportation service. Access however is very limited. Trips can be requested up to two weeks in advance but require a 24-hour notice. The service runs Monday through Friday from 6am to 6pm and Saturday from 7am to 3pm. Hamilton County would benefit from a more extensive public transportation system. Better transportation would help to address the current labor shortage in the county for low-skilled labor a large number of whom have historically commuted into Hamilton County from surrounding areas where housing is more affordable.

Overall, local officials across the county consistently reported that labor shortages in a variety of occupations, though more often than not with a particular focus on low to moderate skilled jobs, are a primary barrier to economic development in Hamilton County. Many also noted that the labor shortages are exacerbated by a lack of affordable housing options for individuals in these occupations and/or a lack of public transportation as the lack of these features within the community; with low

unemployment low-wage workers have more options to choose from and unless wages in Hamilton County reflect a sufficient wage premium these workers are more likely to seek employment closer to home which more often than not is more affordable than housing options in Hamilton County. Overall, Hamilton County would benefit from the addition of affordable workforce housing and additional public transportation options.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Next Level Jobs is part of Governor Holcomb's Next Level Indiana agenda. The program is charged with bringing the state's workforce into the future with a focus on high-priority industries and in-demand, high payment jobs. Next Level Jobs provides Indiana residents with free state-wide training in high-paying, in-demand industries and employers with reimbursements of up to \$50,000 to train their employees in these high-growth fields. The Hamilton County Workforce Innovation Network is a countywide collaborative workforce development effort between local businesses, educational institutions, and local and state community agencies that is partnering with the Next Level Jobs programs. The network focuses on five high-demand industry sectors - advanced manufacturing, ag tech, construction, healthcare, and information technology - with the goal of creating a robust talent pipeline throughout the county to meet the demands of businesses within the county. Over the planning period, we expect workforce training programs to continue to focus on jobs within these industries.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Hamilton County is ranked as the most well educated in the state (96.2 percent have high school diploma or more; 57.5 percent have bachelor's degree or more). Employment opportunities in the county generally correspond with the high level of education with above average concentrations of employment in high skill industries such as professional services, finance, and insurance. There is however significant variation within the county both in terms of educational attainment and employment opportunities. Through the consultation process it was revealed that the county is experiencing labor shortages for select occupations, particularly low-wage and low-skill labor.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The State of Indiana focuses on workforce development through Workforce One. Hamilton County is in WorkOne Region 5, which is all eight counties that surround Marion County/Indianapolis. The Hamilton County WorkOne location is in Noblesville. WorkOne provides services for both employers and job seekers. For employers, WorkOne offers cost-effective convenient access to thousands of job seekers. For job seekers WorkOne acts as a key source of information, job referrals, placement assistance and

other services. Under contract with the Region 5 Workforce Board Inc., Interlocal Association provides Workforce Innovation and Opportunity (WIOA) services to adults, dislocated workers, and youth in the eight-county area including in Hamilton County. The work of WorkOne and its contracted partner Interlocal Association provide residents with employment opportunities which in turn can improve their access to affordable housing in the county.

The Hamilton County Workforce Innovation Network is a countywide collaborative workforce development effort between local businesses, educational institutions, and local and state community agencies. The network focuses on five high-demand industry sectors - advanced manufacturing, ag tech, construction, healthcare, and information technology - with the goal of creating a robust talent pipeline throughout the county to meet the demands of businesses within the county. Job placement network partners include WorkOne, Next Level Jobs, Ascend Indiana, Next Level Veterans, and TMap.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No

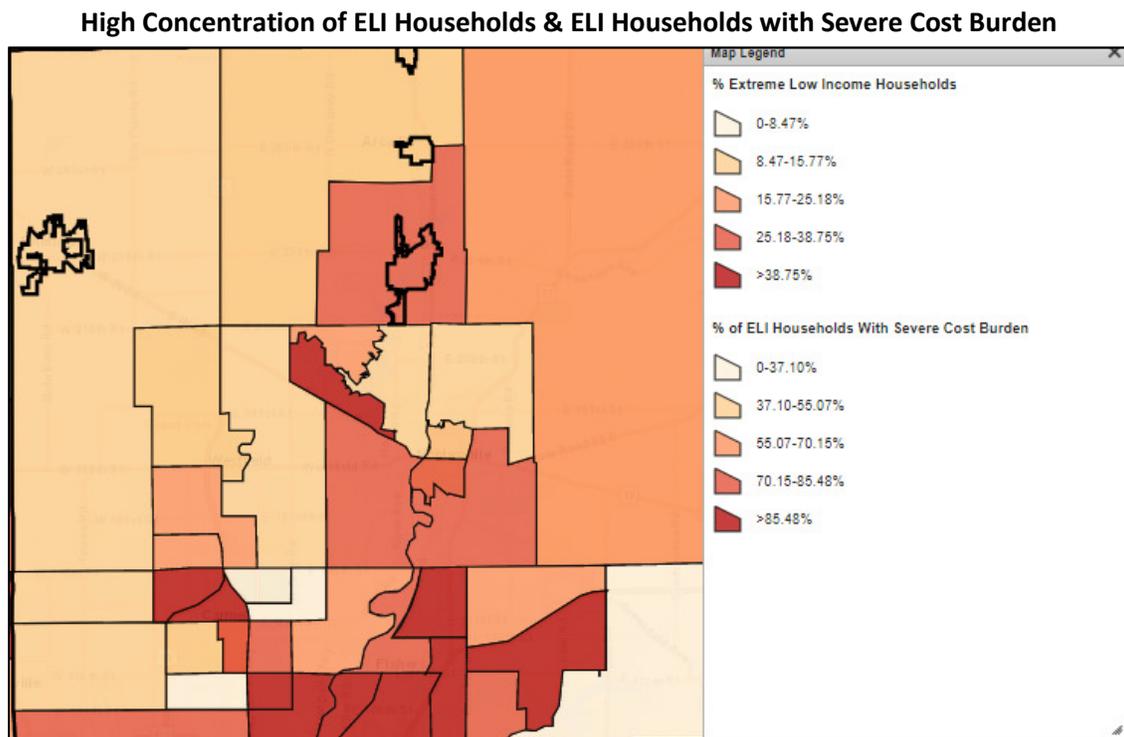
If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

N/A

MA-50 Needs and Market Analysis Discussion

**Are there areas where households with multiple housing problems are concentrated?
(include a definition of "concentration")**

Concentration refers to a large percentage of a group in a particular area and a large percentage of that group having a particular characteristic where large is defined as being in one of the two highest categories on any one measure. Within Hamilton County, the census tracts located in southern Hamilton County and in Fishers and Carmel in particular, have a large percentage of ELI households and a large percentage of ELI households who are severely cost burdened. The following map illustrates this need.



Source: HUD, CPD Maps, June 2019

While these areas exhibit greater need than others, housing problems are distributed throughout the county. The spatial distribution of concentrated housing problems for LI and MI households is similar to that for ELI households, albeit less in magnitude. Overall, while there are areas of concentrated housing problems within the county, problems do exist throughout the county.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Although there are no Racial/Ethnic-Concentrated Areas of Poverty (R/ECAP) located in Hamilton County, there are neighborhoods within the county which have an overrepresentation of minority groups. As previously mentioned approximately 3.7 percent of individuals in Hamilton County are Hispanic and 3.6 percent are Black/African American.

While diversity is increasing in Hamilton County, 87 percent of the population identify themselves as White. Hamilton County racial diversity is more pronounced in the southern parts of the county, close to its neighbor, Indianapolis. Select neighborhoods of Carmel, the majority of the neighborhoods of Fishers, and the unincorporated northeastern portion of Hamilton County have an above average number of Black/African American residents. Select neighborhoods in Carmel, Westfield, Fishers, Noblesville, and the unincorporated northeastern portion of Hamilton County have an above average number of Hispanic residents. One neighborhood in particular southwest of downtown Carmel has a sizeable Hispanic population (approximately 13.95 percent).

What are the characteristics of the market in these areas/neighborhoods?

The southern portion of the county is comprised of the four principal cities in the county and while these are the areas within the county that have some aforementioned concentrations, these are also the most prosperous areas of the county in terms of median income, median home values, median rent, low poverty rates, and number of major employment centers. In other words, the areas that have a high concentration of racial or ethnic minorities are also generally located in the cities where access to opportunities is greatest within the county.

Are there any community assets in these areas/neighborhoods?

Like the low-income population, community assets are scattered throughout the county, including parks, schools and public services. Marketing these programs to households in need is only half the battle. Transportation to the services low-income households need is the other half of the battle. For many low-income households to receive services, they will have to travel across the county or to another county all together. The Noblesville Housing Authority and the public service providers will need to address transportation in the next five years. For some programming, there is not enough demand to create a new location, but offering transportation options to the service in another community may be more fiscally sound.

Are there other strategic opportunities in any of these areas?

The Hamilton County CDBG program and its development partners will need to educate the public and civic leaders about developing a diverse housing stock to accommodate all the households in the community. Since there is not significant concentration of low-income households in the community, it is difficult for the general public or civic leaders to see the households with need unless they interact with them on a daily basis, as the township trustees or a public service provider would. Education and advocacy for the few people struggling to live among the wealthy will be a strategy over the next five years.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

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

Strategies listed as goals are ideas and outcomes the Noblesville Housing Authority will fund with Community Development Block Grant (CDBG) dollars in the next five years (2019 -2023). Projects that meet one of the goals may apply for funding to the Noblesville Housing Authority request for proposal process each year. Programs and projects will be evaluated and recommended for funding through the annual allocation process described later in this document.

Priorities listed are goals and ideas that are consistent with the Consolidated Plan; however, due to funding limitations CDBG dollars may not be used to fund any projects that do not meet one of these outcomes/strategies.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 46 - Geographic Priority Areas

1	Area Name:	Eligible Township Census Tracts
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Housing
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
2	Area Name:	County wide
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	County wide
	Include specific housing and commercial characteristics of this target area.	NA

	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	The consultation process indicates that most needs are county-wide needs
	Identify the needs in this target area.	see above
	What are the opportunities for improvement in this target area?	Better communicating the services and opportunities that are available
	Are there barriers to improvement in this target area?	NA
3	Area Name:	City of Carmel
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
4	Area Name:	City of Fishers
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	

	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
5	Area Name:	City of Noblesville
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	
6	Area Name:	City of Westfield
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	

Include specific housing and commercial characteristics of this target area.	
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
Identify the needs in this target area.	
What are the opportunities for improvement in this target area?	
Are there barriers to improvement in this target area?	

General Allocation Priorities

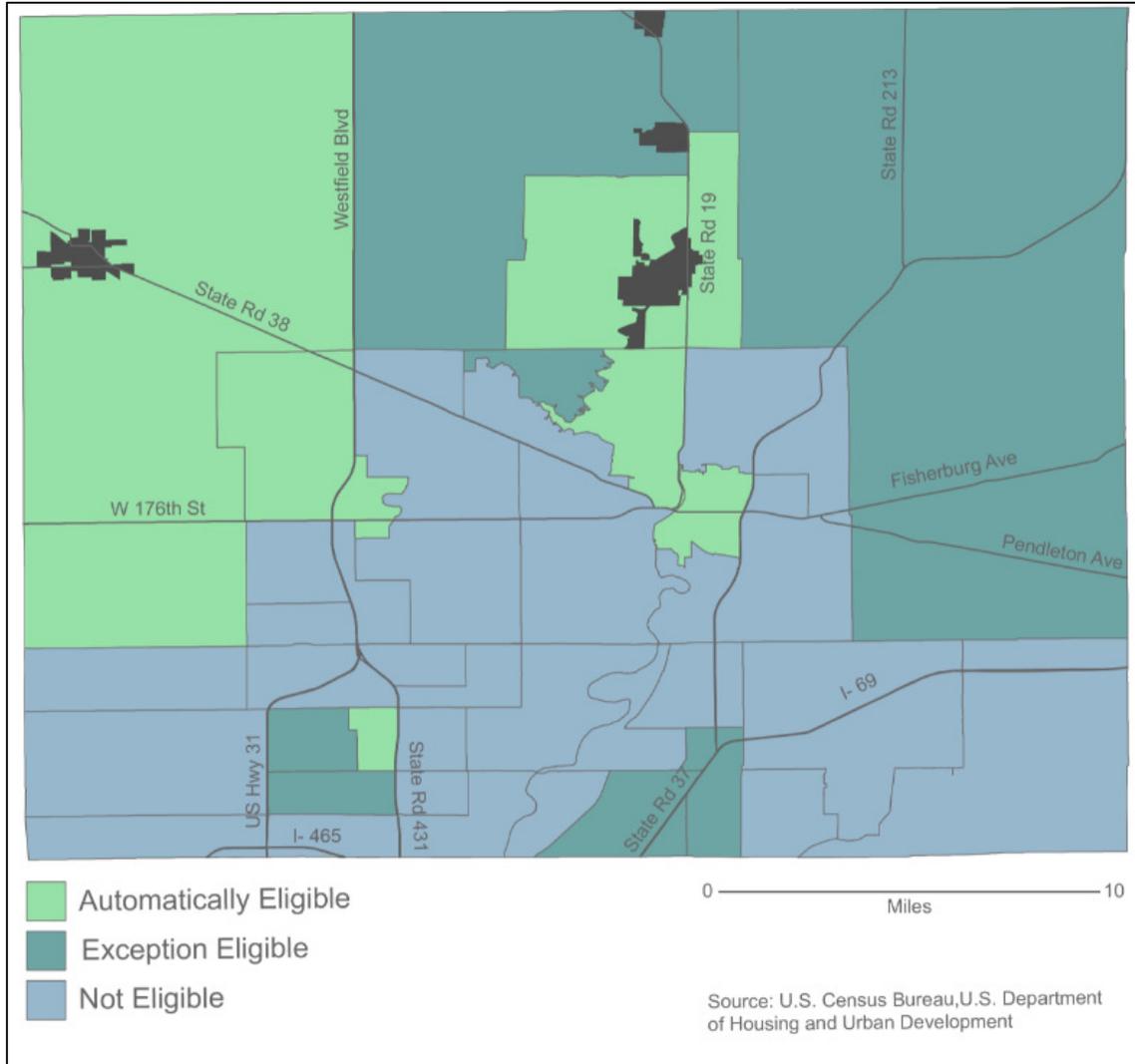
Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Hamilton County allocates approximately 40 percent of the CDBG funds to the four principal cities in the county based on size for infrastructure improvements. The cities, in consultation with the NHA, identify eligible projects in eligible areas.

A place-based CDBG funded project, oftentimes referred to as the “Low Mod Area Benefit”, is a project in which CDBG funds are directed to a designated area rather than to specific individuals or households. In other words, funds can be used to improve a neighborhood even if some of those living in the neighborhood that will benefit from the funds are middle income or upper income households. Activities may qualify for CDBG assistance if the activity will benefit all the residents of a primarily residential area where at least 51 percent of the residents are low- and moderate-income persons, i.e. area-benefit (LMA). Such area-benefit activities include things such as acquisition of land to be used as a neighborhood park, construction of a health clinic or other community center/facility, improvements to public infrastructure, etc. Currently Hamilton County has 12 area-benefit eligible block groups.

In addition to the automatically eligible areas, HUD allows for an exception for select communities given that “some communities have no or very few areas in which 51 percent of the residents are low- and moderate-income. For these grantees, the CDBG law authorizes an exception criterion for such grantees to be able to undertake area benefit activities. Specifically, section 105(c)(2)(A)(ii) of the Housing and Community Development Act of 1974, as amended, states that an activity shall be considered to principally benefit low and moderate income persons when the area served by such activity is within the highest quartile of all areas within the jurisdiction of such city or county in terms of the degree of concentration of persons of low and moderate income.” Thus, each “exception grantee” has a personalized threshold, which “represents the minimum percentage of low- and moderate-income persons that must reside in the service area of an area benefit activity for the activity to be assisted with CDBG funds.” (HUD) The 2019 exception thresholds are based on the 2011-2015 American Community Survey (ACS). Hamilton County has historically been and continues to be an exception grantee. The 2019 fiscal year exception threshold for Hamilton County is 37.83 percent; this represents the minimum

percentage of low and moderate income persons that must reside in the service area of an area benefit activity for the activity to be assisted with CDBG funds. The following table and corresponding map illustrates the automatically eligible and exception eligible areas in Hamilton County in 2019 for activities to be assisted with CDBG funds.



Note: Blacked out areas are the towns which have opted out of the Hamilton County CDBG program.

Source: Novogradac & Company LLP, June 2019

AREA-BENEFIT ELIGIBLE AREAS*

Census Tract	Block Group	Number of Low-Mod Persons	Percentage of Low-Mod Persons	Census Tract	Block Group	Number of Low-Mod Persons	Percentage of Low-Mod Persons
<i>Automatically Eligible</i>				<i>Exception Eligible</i>			
110509	2	945	76.52%	110201	1	390	49.06%
110700	2	935	71.92%	110201	3	395	47.31%
110700	1	995	70.82%	110401	1	930	46.62%
110202	2	480	67.13%	111007	2	570	46.15%
110300	4	520	61.90%	110807	2	745	45.71%
110300	5	585	59.69%	111006	2	1,245	45.52%
110202	4	710	56.35%	110700	3	275	41.98%
111007	1	1,245	55.46%	110201	2	465	40.26%
110600	3	845	55.23%	110810	2	600	40.00%
110300	2	1,540	54.51%	111008	1	1,380	39.83%
110600	2	660	53.44%	110512	1	965	39.47%
110401	2	615	52.12%	110100	3	2,865	38.69%
				110600	1	455	38.40%

*Includes automatically eligible (shaded) and exemption eligible areas.

Source: Novogradac & Company LLP, June 2019

As illustrated, using the exception threshold allows for twice as many area-benefit eligible areas throughout the county though the majority of the eligible areas are still located in the central and northern areas of the county.

Public services receiving CDBG assistance are open to income eligible residents throughout the county. Adhering to CDBG’s national objectives, priority will be given to projects that address the housing and community development needs of low and moderate-income persons, particularly as they are outlined in the Consolidated Plan.

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

- 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

In making funding decisions, the Hamilton County CDBG program will give priority to activities that:

- Support, complement or are consistent with other current local unit of government plans;
- Address those populations with the greatest needs including the elderly, disabled, victims of domestic violence and the disenfranchised such as the homeless and the near homeless. The

County will give priority to programs that provide services addressing the basic needs of our most at-risk populations.

- Are sustainable over time;
- Have demonstrated cooperation and collaboration among government, private nonprofit agencies and the private sector to maximize impacts and reduce administrative costs; and
- Do not have a more appropriate source of funds.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 47 – Priority Needs Summary

1	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate One-person households Small families Families with children Elderly
	Geographic Areas Affected	County wide
	Associated Goals	Housing – Owner Occupied Repair Housing – Rental Housing

	Description	<p>Expand and preserve the supply of safe, decent, affordable housing. Suggested strategies to meet the priority are:</p> <ol style="list-style-type: none"> 1. Support affordable multi-family housing development; this may include support for acquisition costs for affordable housing properties. 2. Support preservation of existing affordable housing stock. 3. Support public and private partnerships to develop affordable housing, with a goal of 10% of new residential building permits to be issued for housing units meeting community standards for quality and affordability. 4. Support affordable housing development that targets single parent households, two parent families and seniors responsible for grandchildren. 5. Support affordable, senior housing development. 6. Find additional resources for rental subsidies that support extremely low income households. 7. Support the quality of affordable rental housing through repair assistance programs. 8. Support establishment of a fund of private dollars through permitting fees or closing fees to support affordable housing development. 9. Support establishment of community-wide standards for quality, affordable housing development.
	Basis for Relative Priority	<p>This priority need was determined through the consultation process and this was the highest need according to the consultation process. High housing costs can put households at-risk of homelessness and reduces economic opportunities and access to social mobility and prosperity. Currently the subsidized and affordable housing stock comprises a very small percentage of the total housing stock and there are accessibility and affordability gaps for extremely low, very low, low, and moderate income renter and owner households.</p>
2	Priority Need Name	Public Services
	Priority Level	High

Population	Extremely Low Low Moderate Families with Children Elderly Frail Elderly Public Housing Residents Chronic Homelessness Veterans Unaccompanied Youth Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
Geographic Areas Affected	County wide
Associated Goals	Public services
Description	Support variety of public service programs that help the most vulnerable households achieve self-sufficiency. Suggested strategies to achieve this are: <ol style="list-style-type: none"> 1. Support transportation assistance programs that address inadequate or inconsistent transportation options to employment centers which puts low and moderate income households at-risk. 2. Support services that provide emergency housing, utility, and/or food assistance. 3. Support services that address gaps in health care access or needs for low-income families not covered by the Affordable Health Care Act. 4. Support services that promote economic security and self-sufficiency. 5. Support job training service programs to help low income workers gain new skills. 6. Support services that include case management for special needs households.
Basis for Relative Priority	This priority need was determined through the consultation process. Public services help residents with basic daily living needs and is the primary way to reach a variety of households and individuals with special needs and at-risk of homelessness.

3	Priority Need Name	Public Infrastructure and Facility Improvement
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Families with Children Elderly Frail Elderly Public Housing Residents Chronic Homelessness Veterans Unaccompanied Youth Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	Eligible Township Census Tracts
	Associated Goals	Public improvements and infrastructure

	Description	<p>Invest in public facility and public infrastructure needs of low-income neighborhoods. Suggested strategies to address this priority are:</p> <ol style="list-style-type: none"> 1. Improve and maintain infrastructure servicing households in low income areas 2. Connect with regional transportation planning organizations to advocate for transportation planning to the more vulnerable neighborhoods in the northern part of Hamilton County. 3. Support the development of public facilities that target services for at-risk and special needs families and households. 4. Support ADA accessibility projects. 5. Support stormwater/sewer rehabilitation projects. 6. Support livable neighborhood improvement projects. 7. Support creation of shelter for victims of domestic violence. 8. Support creation of mental healthcare facility. 9. Support creation of substance abuse treatment facility.
	Basis for Relative Priority	<p>This priority need was determined through the consultation process. Public infrastructure and public facility improvements enable the Cities of Carmel, Fishers, Noblesville and Westfield to leverage other dollars and serve more low income households by serving the entire neighborhood in which they live. These projects get the most benefit for the investment for this reason.</p>
4	Priority Need Name	Homeless Assistance
	Priority Level	High

	Population	Extremely Low Low Families with Children Elderly Frail Elderly Public Housing Residents Chronic Homelessness Veterans Unaccompanied Youth Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	County wide
	Associated Goals	Housing/services for persons who are homeless.
	Description	Improve access to and availability of services for households experiencing homelessness including those who do not meet the formal HUD definition due to doubling up. Suggested strategies to meet this priority are: <ol style="list-style-type: none"> 1. Emergency assistance 2. Temporary housing assistance 3. Other living expenses such as household goods 4. Life skills training including financial literacy 5. Case management services
	Basis for Relative Priority	This priority need was determined through the consultation process.
5	Priority Need Name	Administration and Planning
	Priority Level	High
	Population	Other

Geographic Areas Affected	County wide
Associated Goals	Administration and Planning
Description	Overall administration and planning for the CDBG program.
Basis for Relative Priority	Need for overall administration and planning of the CDBG program to ensure that all activities are carried out in compliance with HUD regulations.

Narrative (Optional)

Priorities include conditions most important to Hamilton County to address the needs in the community. Goals listed later in this consolidated plan will meet the priorities outlined in this section. Projects funded by CDBG must meet these later goals, though other projects that only meet the priorities may not qualify for funding, but would remain consistent with the consolidated plan. Because of the large service area of the CDBG dollars and the varying needs of each community, the list of priorities is large and flexible to meet the different communities' needs.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	N/A
TBRA for Non-Homeless Special Needs	N/A
New Unit Production	Availability/affordability of land for development; Architectural standards and building fees; Demand for new housing from persons moving from other communities into the county
Rehabilitation	High acquisition costs make rehabilitation for affordable housing development challenging; Older homes/lead-based paint issues; Elderly/Frail elderly residents hoping to age in place; Neighborhood improvements and general market conditions such as trends in home values.
Acquisition, including preservation	Acquisition will be easier in areas with lower housing and land costs, such as communities in the northern parts of the county; Number of older improvements/abandoned properties.

Table 48 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

Hamilton County will use Community Development Block Grant funds as the primary source of funding for projects. The funding may seem large, but \$1,032,481 per year does not spread out far enough to meet the demand of affordable housing and social services.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Housing Public Improvements Public Services Homeless Services	1,032,481.00	0	175,920.80	1,208,401.80	1,208,401.80	Funding will be used to address the priorities and goals identified in this plan.

Table 49 - Anticipated Resources

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

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

There is some prior year funding committed to FY19 community infrastructure activities that have not yet been implemented. They may be linked to FY20 infrastructure activities to complete larger projects.

To complete the development of larger projects, such as the domestic violence shelter, the Noblesville Housing Authority may have to combine some of those larger awards together to match other capital funds to complete the project. This type of effort will require partnership on the part of all the communities in Hamilton County.

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

Hamilton County will not utilize publicly owned property to address the needs in the plan.

Discussion

The Noblesville Housing Authority (NHA) played a role in the establishment of Hamilton County Area Neighborhood Development (HAND) to be an affordable housing development organization. HAND now operates as its own entity and must seek funding for its development projects. As a result of funding levels and changing market conditions, the amount of funding needed to create affordable housing exceeds the amount of CDBG available. HAND must, and has historically been successful at, finding other funding from public and private resources to supplement CDBG funds. Similarly, social service providers, including those who serve the homeless and people with special needs, will have to continue to rely on other sources of funding in addition to CDBG funds.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Noblesville Housing Authority	PHA	Affordable Housing Economic Development Homelessness Non-homeless special needs Ownership Planning Public Housing Rental neighborhood improvements public facilities public services	Jurisdiction
Hamilton County Commissioners	Government	Affordable Housing Economic Development Homelessness Non-homeless special needs Ownership Planning Public Housing Rental neighborhood improvements public facilities public services	Jurisdiction
Region 8 Continuum of Care	Continuum of Care	Homelessness	Jurisdiction
City of Carmel	Government	neighborhood improvements public facilities	Jurisdiction
City of Fishers	Government	neighborhood improvements public facilities	Jurisdiction

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Noblesville	Government	neighborhood improvements public facilities	Jurisdiction
City of Westfield	Government	neighborhood improvements public facilities	Jurisdiction

Table 50 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Strengths

The NHA is responsible for developing, implementing, and monitoring the Consolidated Plan. The NHA is also responsible for the Section 8 Housing Choice Voucher program which provides the agency with significant insight into the needs of extremely low to moderate income households. As a government agency, but also one that serves extremely low to moderate income households, the NHA is ideally positioned within the institutional delivery system to administer the CDBG program.

Many firms, individuals, agencies and other organizations are involved in the provision of housing and community development in Hamilton County. This is the strength in Hamilton County, that there are many, *privately funded* organizations that serve families living in poverty or struggling to make ends meet. The number of organizations and people funding and working towards addressing the needs is vast if a person in need knows where to look for help.

The county also has the GSN which acts as a facilitator among service providers in the county. This network allows service providers to identify potential collaboration partners as well as better serve clients through referrals to other service providers in the county.

Gaps

The challenge in this delivery system for Hamilton County is that it is spread over a large area, roughly 403 square miles. Housing and non-housing needs vary by geographic area within the county. Access to public services and economic opportunity for low and moderate income households also vary greatly within the county. Each of these areas has its own elected officials and land use regulations and architectural standards. The lack of public transportation services within the county exacerbate these inequalities.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement			
Mobile Clinics			
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse	X		
Child Care	X		
Education	X		
Employment and Employment Training	X		
Healthcare	X		
HIV/AIDS			
Life Skills	X		
Mental Health Counseling	X		
Transportation	X (limited)		
Other			

Table 51 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

A variety of service providers work in the county to try to meet the needs of homeless persons. The consultation process indicated that many of these service providers work in collaboration with one another to meet the needs of this population. Organizations include, but are not limited to, Third Phase, (emergency shelter for individuals), Family Promise (temporary shelter for families), Good Samaritan Network, Prevail, Township Trustee offices, United Way, HAND, Aspire, NHA, Trinity Free Clinic, among others.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Strengths include countywide service programs offered by a variety of organizations. Additionally, many of these organizations including the United Way and the Township Trustee offices offer a publicly accessible list of potential service providers in the county by type of service provided, which can be a very useful resource for households in search of assistance. Finally, through the consultation process, it became clear that not only do organizations participate in the larger collaborative efforts (GSN/CoC), but they also coordinate and collaborate with one another in smaller collaborative efforts.

The most significant gap is the lack of affordable housing opportunities in the county. Additionally, the spatial mismatch between the location of service providers, the majority of which are located in Noblesville, and the location of the populations in need which are distributed throughout the county is a gap for the area. Additionally, the county does not have a shelter for victims of domestic violence; these households must go to an adjacent county for shelter. These gaps are exacerbated by the lack of public transportation.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The strategy for overcoming gaps in the institutional structure and service delivery system in order to address priority needs will include supporting organizations working to address homelessness, transportation and affordable housing issues within the county. Hamilton County will also offer non-funded support for the following strategies to address this priority are:

1. Collaborate and coordinate CDBG public service awards with County Commissioner discretionary fund awards to reduce duplication and more efficiency leverage county-wide resources.
2. Connect service providers to affordable housing opportunities for their clients.
3. Participate in the Regional Continuum of Care and support homelessness prevention and intervention initiatives.
4. Support neighborhood beautification efforts that combine public and private resources.
5. Connect with the City of Indianapolis and regional initiatives to support individuals living with HIV/AIDS in Hamilton County.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2019	2023	Affordable Housing	County-wide	Affordable housing	CDBG: \$200,000	Homeowner Housing Rehabilitated: 12-20 Housing Units repaired Acquisition of land/improvements and/or new construction for new affordable housing development: number of beneficiaries depends on project size
2	Public Services	2019	2023	Public Services	County-wide	Public services	CDBG: \$147,872	Public service activities other than Low/Moderate Income Housing Benefit or infrastructure improvements: approximately 3,989 Persons Assisted
3	Public Infrastructure and Facility Improvements, including Domestic Violence shelter	2019	2023	Public Infrastructure and Facility Improvements	County-wide	Public Infrastructure and Facility Improvements	CDBG: \$412,992	Public infrastructure projects benefiting low to moderate income households including, but not limited to, of water and sewer lines, drainage projects, and public facility needs, which can include ADA accessibility, park renovations, a shelter for victims of domestic violence, mental healthcare facility, and a treatment facility for persons struggling with substance abuse Overnight/Emergency Shelter/ Transitional Housing Beds for victims of domestic violence added: 20 beds Mental healthcare facility: 10-20 beds Substance abuse treatment facility: 10-20 beds

4	Homeless Assistance	2019	2023	Homeless	County-wide	Homeless Assistance	CDBG: \$7,000	Services and assistance for households experiencing or at-risk of homelessness: 40-60 households
5	Administration and Planning	2019	2023	Administration and Planning	County-wide	Administration and Planning	CDBG: \$185,847	N/A

Table 52 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable housing
	Goal Description	Providing new and preserving existing affordable housing to low- and moderate-income households
2	Goal Name	Public Services
	Goal Description	Support public services that provide basic daily living needs
3	Goal Name	Public Infrastructure and Facility Improvements
	Goal Description	Replacement or creation of water and sewer lines, drainage projects, and public facility needs, which can include ADA accessibility, park renovations, a shelter for victims of domestic violence, mental healthcare facility, and a treatment facility for persons struggling with substance abuse
4	Goal Name	Homeless Assistance
	Goal Description	Services and assistance for households experiencing or at-risk of homelessness
5	Goal Name	Administration and planning
	Goal Description	Overall administration of the CDBG program

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Homeowner repair programs across Hamilton County will benefit households earning more moderate level income. An estimated 12 to 20 units of repair will be targeted towards households earning less than 80 percent of the area median income.

The Noblesville Housing Authority is partnering with the Good Samaritan Network, Hamilton County Association for Neighborhood Development (HAND) and the Region 8 Planning Council for the development of a Domestic Violence Shelter to serve extremely low-income households. It is unknown at this point in the planning stages how many beds the shelter will accommodate. The goal listed above estimates approximately 20 beds for the development for persons earning less than 30 percent of the area median income.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The NHA does not develop or manage housing units. The NHA did start the Hamilton County Area Neighborhood Development organization, a separate non-profit organization with the mission to *invest in neighborhoods, providing housing solutions, and building partnerships to improve the lives and build community in Hamilton County*. The NHA supports developments by HAND or other private developers with local Community Development Block Grant dollars.

Activities to Increase Resident Involvement

The Noblesville Housing Authority does not manage housing units and only administers the Section 8 Housing Choice 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 in the private market that would not be affordable to them. The household pays 30 percent of their gross monthly income towards rent and utilities and the voucher subsidizes the remainder of the rent owed to the landlord.

Through the administration of CDBG programs, the NHA supports public services across the community. Voucher recipients are provided information about service programs near the housing of their choosing.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the ‘troubled’ designation

Not applicable to this public housing agency.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

While barriers to affordable housing can come from anywhere, the U.S. Department of Housing and Urban Development (HUD) recognizes universal barriers. Local and state regulations on zoning and building are often the most recognized barriers to affordable housing.

On June 21, 2017, Fair Housing Center of Central Indiana, Inc. (FHCCI) filed a complaint against Hamilton County, Indiana (CDBG recipient) and the City of Noblesville, Indiana (CDBG sub-recipient) with HUD. The complaint alleges that the City of Noblesville violated the Fair Housing Act by implementing two municipal zoning ordinances that discriminate on the basis of familial status, race and national origin. Additionally, the complaint was filed under Title VI of the Civil Rights Act on the basis of race and national origin. The complaint was brought against both the city and the county, but Hamilton County, as the grantee, has the ultimate responsibility for compliance of its sub-grantees, which in this case was the City of Noblesville. According to the complaint, in 2015 the City of Noblesville was awarded \$95,334 in CDBG funds for public infrastructure improvements, namely 2,575 linear feet of sidewalk on Pleasant and Walnut Streets. The complaint indicates that while the 2016 Analysis of Impediments to Fair Housing for Fair Housing “did not find any regulatory impediments to fair housing choice”, that there were in fact two ordinances passed in Noblesville, one in 2008 and one in 2013, that the complainant claims do just that. The 2008 ordinance prohibits rent subsidies to be sought or accepted from any federal, state, or local government and the 2013 ordinance explicitly prohibits subsidized housing.

The parties have since entered into a Voluntary Compliance Agreement on October 8, 2018. As part of the agreement, Hamilton County will convene a Working Group, headed by the Noblesville Housing Authority (in its capacity as administrator of Recipient’s community development funds), and comprised of subrecipient officials (or their designees), township trustees (or their designees), HAND, Inc., and other organizations or government officials that may be deemed appropriate.” The requirements of the Working Group are included in the full settlement agreement which is attached to this Consolidated Plan. The aforementioned ordinances were amended on June 25, 2019.

In addition to the aforementioned regulatory barriers, the consultation process identified several additional barriers to the development of affordable housing. These include:

- Inadequate supply of affordable housing suggests a history of barriers to new development
- High costs of property acquisition near amenities in the more developed communities of Hamilton County, such as Carmel, Fishers, Noblesville and Westfield
- City architectural standards
- A limited supply of housing units where a Section 8 Housing Choice Vouchers can be used
- A lack of transportation where creation of affordable housing development is less of a financial challenge

- A lack of amenities such as grocery stores in areas where there is less opposition to affordable housing which subsequently renders these locations uncompetitive for LIHTC funds from the state.
- Insufficient state and federal resources for affordable housing programs
- NIMBY-ism (Not-in-my-back-yard)

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

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

- Select target areas based on potential competitiveness given the statewide qualified allocation plan for LIHTCs.
- Attract for-profit developers to partner with non-profit service agencies to develop affordable housing development for extremely low-income families; connecting services and rental assistance with new developments
- Build projects without long-term debt to help fund operations and maintenance of property
- Advocate for public and private transportation options for low income families living outside of walking distance of amenities needed for daily living, such as grocery stores, health care and employment options
- Enlist all levels of City government to be “cheerleaders” for affordable housing
- Feed positive stories to media outlets to counter negative stories oriented from the urban core

Hamilton County will seek private/public partnerships to help achieve these goals and target communities working together to increase affordable housing options; this will help achieve the goals while addressing some of the biggest barriers to affordable housing development, such as educating the public and civic leaders about affordable housing, advocating for transportation options in all areas of the community and working together to attract additional subsidy to overcome high cost of property acquisition.

To help the community as a whole overcome the barriers to affordable housing development, and also maximize the impact in the community, Hamilton County will strive to achieve the following goals.

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

SP-60 Homelessness Strategy – 91.215(d)

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

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

The Indiana Balance of State Continuum of Care includes 91 of the 92 counties in the state. These 91 counties are divided into 16 regions and each region is overseen by a regional planning council and chairperson. Hamilton County is part of Region 8 in the Indiana Balance of State CoC along with Boone, Hendricks, Madison, and Hancock Counties. The Region 8 CoC works with a variety of providers in Hamilton County including, but not limited to: GSN, Prevail, Township Trustee offices, Third Phase, Family Promise, Aspire Indiana, Community Corrections, and the Noblesville Housing Authority. While there are no specific CoC goals for the upcoming year, the CoC will continue to work with local service providers to address the needs of the homeless in the county.

Addressing the emergency and transitional housing needs of homeless persons

Hamilton County does not receive Emergency Solutions Grant funding as an entitlement jurisdiction. Hamilton County is however able to apply for statewide funds through The Indiana Housing and Community Development Authority (IHCDA). For the past six years, Emergency Solutions Grant Rapid Rehousing and Homeless Prevention funds in Hamilton County are administered by Aspire Indiana, Inc., a private non-profit organization, in coordination with the CoC. Aspire Indiana, Inc. serves Hamilton, Boone, Hendricks, Madison, and Hancock Counties. According to the Indiana Housing and Community Development Authority, Aspire Indiana, Inc. was awarded \$75,000 in ESG funds in 2018 of which ten percent went towards Homeless Prevention. The percent of funds spent on Hamilton County residents versus residents of the other two counties was unavailable. The 2019 awards have not yet been announced.

The primary shelter for Hamilton County is Third Phase, which is located south of Noblesville. Third Phase serves as a last option for Hamilton County residents before they turn to services or other shelters in Indianapolis. Third Phase provides shelter to up to 50 single men and single women at any given time for up to 30 days; the shelter does not currently accommodate families. Shelter residents are given daily tasks to assist in maintaining the facility. Third Phase also offers a food pantry and thrift store. The food

pantry provides food for shelter residents as well as emergency food for members of the general public (up to once every 30 days). The thrift store provides clothing and household supplies for shelter residents as well as emergency supplies for members of the general public with a referral letter from the Hamilton County Trustee's office. Shelter residents receive additional clothing and household supplies upon leaving the shelter.

As previously mentioned, there is no formal emergency shelter or transitional housing for families in Hamilton County. In May 2019, Family Promise of Hamilton County was formed and began working to fill this gap by providing assistance to families experiencing homelessness. The organization is a non-profit organization that works through a collaboration of local churches to provide temporary housing, meals, and transportation as well as mentoring for at-risk families, teaching financial literacy, and helping parents find jobs and affordable housing for their family. According to Family Promise of Hamilton County, every month approximately 200 families in Hamilton County receive eviction notices and there is no shelter in Hamilton County for families, and shelters in neighboring municipalities are oftentimes at maximum capacity. As a result, many of these families end up sleeping in a car, couch-surfing with family or friends, or depleting any savings at extended stay motels. While the organization does not provide emergency shelter, it does provide temporary housing for families of up to 90 days with a one-time extension under special circumstances. The organization can currently serve four families at one time and expects to serve a total of 12 to 15 families in 2019 and 20 to 24 families in 2020. The majority of the requests received to date have however been for immediate emergency assistance, either financial to assist with the cost of temporary housing in a motel, or emergency shelter for families and this is not a service that is provided by the organization.

The Merciful H.E.L.P. Center is a social enterprise of Our Lady of Mount Carmel Church in Carmel. The Merciful H.E.L.P. Center offers a food pantry that served 25 to 55 families in one two-hour period in 2018. Additionally, the center offers assistance to parishioners to stay in their homes by providing assistance in filing for government aid and assisting financially through periods of unemployment. In 2010 the center established a program to help families re-establish themselves after having been homeless. Services include providing housing as well as essential furniture and houseware needs and/or a vehicle to help the individual re-enter the workforce. The organization also assists with down payments as well as utilities.

Hamilton County is the largest county in the state to not have a domestic violence shelter. Instead, victims of domestic violence are oftentimes referred to Alternatives, Inc. of Madison County, which operates a domestic violence shelter in Anderson, which is located approximately 25 east of Hamilton County. Alternatives currently serves a six-county area including Hamilton, Hancock, Henry, Madison, Marion, and Tipton. According to Alternatives' 2018 Annual Report, 547 clients were served and a total of 7,580 safe nights provided in 2018. Of these, 51 were from Hamilton County; this was a significant increase from the two previous years during which 22 to 23 clients were provided shelter. The Noblesville Housing Authority is partnering with the Good Samaritan Network, Hamilton County Association for Neighborhood Development (HAND) and the Region 8 Planning Council for the development of a Domestic Violence Shelter to serve extremely low-income households.

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.

There are no permanent supportive housing units provided in the county and the development of these units will face all of the aforementioned barriers to the provision of affordable housing in the county. As such, continued support for both organizations and service providers who provide emergency assistance as well as those that provide general permanent affordable housing opportunities, as well as promotion of increased collaboration and cooperation between these organizations, will continue to be an important strategy for the county.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Limited financial resources prohibit the Noblesville Housing Authority (NHA) from supporting any one project or program with a significant amount of funds. The NHA can spend up to 15 percent of its annual allocation towards public services. One high priority goal for the NHA in this Consolidated Plan is to support programs that help the most vulnerable households achieve self-sufficiency. Public service programs such as food pantries, legal services, health services, childcare, transportation and fair housing will be funded under this goal in the next five years.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

The Hamilton County Health Department serves as the primary method for screening children with elevated lead blood levels. The Noblesville Housing Authority (NHA) will support the lead paint program at the Hamilton County Health Department by taking on referrals to receive repairs or lead abatement/renovation through the Community Development Block Grant (CDBG) program. Currently the NHA follows the U.S. Department of Housing and Urban Development (HUD) rules for addressing lead based paint hazards when applying CDBG and other grant money.

Effective September 15, 2000, Federal regulations require that lead hazard evaluation and reduction activities be carried out for all CDBG funded projects receiving housing assistance that were constructed before January 1, 1978. The requirements for rehabilitation correspond to three (3) approaches to lead hazard evaluation and reduction. Large rehabilitation projects must meet more stringent requirements than smaller ones. The three approaches are:

1. Do no harm. Perform the rehabilitation in a way that does not create lead hazard.
2. Identify and control lead hazards. Identify lead-based paint hazards and use a range of methods to address the hazards.
3. Identify and remediate lead hazards. Identify lead-based paint hazards and remove them permanently.

The level of hazard reduction required depends on the level of assistance. Specific actions required include:

Up to \$5,000 - Repair of paint disturbed during rehabilitation. Includes repairing disturbed paint and applying a new coat of paint.

\$5,000 - \$25,000 Interim controls and standard treatments. Includes addressing friction and impact surfaces, creating smooth and cleanable surfaces, encapsulation, removing or covering lead-based paint components, and paint stabilization.

Over \$25,000 Remediate. Remediation involves permanently removing lead-based paint hazards, often through paint and component removal and enclosure.

Hamilton County will use CDBG funds to undertake lead-based paint hazard mitigation when required by the housing rehabilitation regulations. This can include inspection, risk assessment, specification writing, abatement, clean up, disposal work and clearance testing. This assistance will be in accordance with 24 CFR 35, et al. (9/15/99). A certified risk assessor will inspect all such housing.

Any required lead paint mitigation measures will be coordinated with the total renovation effort to streamline the process for the benefit of the homeowner; and also maximize total rehabilitation

dollars. This process will minimize the number of days the owner will have to be temporarily relocated during the abatement process.

The Hamilton County Health Department provides Blood Lead Level Testing for children. It is recommended that children six (6) years old and under be screened for lead. Children living in, regularly visiting or attending a child care facility built before 1978 should be tested. Testing is conducted at the Hamilton County Health Department by appointment only on the second and fourth Wednesday of the month. According to the 2017 Childhood Lead Surveillance Report released by the Indiana Department of Health, 1,903 children in Hamilton County were tested for lead-based paint issues and of those six had elevated test results.

How are the actions listed above related to the extent of lead poisoning and hazards?

The age of the housing unit will tell a household if there is a risk for lead based paint poisoning. Lead paint was banned in 1977 by the U.S. government's Consumer Product Safety Commission (CPSC), although it was not used frequently in residential buildings after the 1960s. Homes built up to 1978 have some risk for lead based paint hazards, although most homes must have been built prior to 1960 to be at high risk for lead based paint hazards. Lead based paint hazards are paint chips, which you can see, and lead dust, which you can't always see. The only way to determine if you have lead paint hazards is to test the home.

A total of 4,328 housing units including 2,968 owner units and 1,360 rental units in Hamilton County were built prior to 1950; these homes are at high risk for lead based paint hazards. Information is not available as to whether these households are occupied by low to moderate income families. If we assume that low to moderate income households are evenly distributed within the housing stock, then we estimate that approximately 527 owner and 649 rental housing units with lead-based paint hazards that may be occupied by low to moderate income households. Any occupied homes that were built prior to 1978 and request repairs through the CDBG funded programs will follow the above policies to limit lead paint hazard to the occupants.

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.

Those who have concerns about lead paint hazards can contact the Hamilton County Health Department for testing of their children or other members of the family. Education will be important for landlords as well. Federal law requires landlords to disclose any history of lead paint hazards in the home prior to leasing the property. The strategic plan will look to educate the public about lead paint hazards.

How are the actions listed above integrated into housing policies and procedures?

The Federal regulations regarding lead based paint hazards and the requirements for housing renovation have been incorporated as part of the Noblesville Housing Authority's policies and procedures manual. A copy of the policies and procedures manual will be provided to the grant recipient/housing provider at the time of contract. Any sub grantee, contractor or housing provider will need to comply with the policies and procedures. Monitoring of the project will ensure compliance.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

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

Promote economic empowerment by supporting facilities, services and activities aimed at developing the self-sufficiency for all low to moderate-income residents. Programs and activities to be supported over the next five years include:

- Provide affordable housing opportunities to low and moderate-income households
- Support the development of housing for extremely low income households, particularly those earning less than 30 percent of the area median income
- Transportation services
- Child care services
- Healthcare
- Food banks
- The creation of jobs through local incentives
- Job training programs
- Assist businesses with improvements and job creation
- Promote Section 8 opportunities in current housing projects
- Provide economic development opportunities to low to moderate-income families
- Support services that target homeless households that are doubling up and thus do not meet HUD's definition and as such are ineligible for select homeless services in the county
- Develop a funding resource for households that do not meet the HUD income requirements but are at-risk of losing their housing
- Continue to work with local agencies to identify barriers and issues related to poverty and support programs that will help low to moderate-income households overcome those barriers

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

As discussed in the market analysis and needs assessment sections of this Consolidated Plan, there is a gap in affordable and accessible housing in the county and this gap is particularly significant for households at the bottom of the income distribution. It is essential for families living in poverty to have more housing options. And, the new housing options must be closer to work, transportation options and public amenities such as grocery stores, health care and schools. Hamilton County will continue to work to address this need through the priority needs identified in this Plan.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use 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. Monitoring shall be an ongoing process with technical assistance available throughout the implementation and completion of all activities undertaken.

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 -- benefit low and moderate income persons, aid in the prevention or elimination of slum and blight conditions, or meet an urgent need which threatens the health or welfare of the community.
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. Funding agreements for all real property activities shall specify the acceptable use of the property, the length of the restrictive period, and disposition requirements.

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. If this does occur, all program income shall be returned to the NHA for appropriate use and reporting.

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. The annual reviews are followed up with written statements of compliance or non-compliance. In situations of non-compliance, the written statements detail methods and timeframes to bring the activity back into compliance.

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, which is when final payments and all related matters are closed.

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.

Expected Resources

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

Introduction

Hamilton County will use Community Development Block Grant funds as the primary source of funding for projects. The funding may seem large, but \$1,032,481 per year does not spread out far enough to meet the demand of affordable housing and social services.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Housing Public Improvements Public Services Homeless Services	1,032,481	0	175,920.80	1,208,401.80	1,208,401.80	Funding will be used to address the priorities and goals identified in this plan.

Table 53 - Expected Resources – Priority Table

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

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

To complete the development of larger projects, such as the domestic violence shelter, the Noblesville Housing Authority may have to combine some of those larger awards together to match other capital funds to complete the project. This type of effort will require partnership on the part of all the communities in Hamilton County.

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

Hamilton County will not utilize publicly owned property to address the needs in the plan.

Discussion

The NHA played a role in the establishment of Hamilton County Area Neighborhood Development (HAND) to be an affordable housing development organization. HAND now operates as its own entity and must seek funding for its development projects. As a result of funding levels and changing market conditions, the amount of funding needed to create affordable housing exceeds the amount of CDBG available. HAND must, and has historically been successful at, finding other funding from public and private resources to supplement CDBG funds. Similarly, social service providers, including those who serve the homeless and people with special needs, will have to continue to rely on other sources of funding in addition to CDBG funds.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2019	2023	Affordable Housing	County-wide	Affordable housing	CDBG: \$200,000	Homeowner Housing Rehabilitated: 12-20 Housing Units repaired
2	Public Services	2019	2023	Public Services	County-wide	Public services	CDBG: \$147,872	Public service activities other than Low/Moderate Income Housing Benefit or infrastructure improvements: approximately 3,989 Persons Assisted
3	Public Infrastructure and Facility Improvements	2019	2023	Public Infrastructure and Facility Improvements	County-wide	Public Infrastructure and Facility Improvements	CDBG: \$412,992	Public service activities other than Low/Moderate Income Housing Benefit or infrastructure improvements: number of persons assisted to be determined depending on the projects and locations of those selected projects
4	Homeless Assistance	2019	2023	Homeless	County-wide	Homeless Assistance	CDBG: \$7,000	Services and assistance for households experiencing or at-risk of homelessness: 40-60 households
5	Administration and Planning	2019	2023	Administration and Planning	County-wide	Administration and Planning	CDBG: \$185,847	N/A

Table 54 – Goals Summary

Goal Descriptions

1	Goal Name	Housing - Owner Occupied Repair
	Goal Description	Grants to moderate income (or below) homeowners for up to \$10,000 to repair/replace a major system of a house where failure to do so will threaten the households, immediate health and safety.
2	Goal Name	Public Services
	Goal Description	Fund projects for 2019: Family Promise of Hamilton County, GSN, Hamilton County Harvest Food Bank, HOPE Family Care Center, Meals on Wheels, Prevail, Inc., Shepherd's Center, and Trinity Free Clinic
3	Goal Name	Public Infrastructure and Facility Improvements
	Goal Description	Fund infrastructure projects in the Cities of Carmel, Fishers, Noblesville and Westfield.
4	Goal Name	Homeless Assistance
	Goal Description	Fund projects in 2019: Family Promise of Hamilton County, GSN, Hamilton County Harvest Food Bank, HOPE Family Care Center, and Trinity Free Clinic
5	Goal Name	Administration and planning
	Goal Description	Overall administration of the CDBG program.

Projects

AP-35 Projects – 91.220(d)

Introduction

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

Projects

#	Project Name
1	Administration
2	Carmel - Infrastructure
3	Fishers - Infrastructure
4	Noblesville - Infrastructure
5	Westfield - Infrastructure
6	Family Promise of Hamilton County
7	Good Samaritan Network
8	Hamilton County Harvest Food Bank
9	HOPE Family Care Center
10	Meals on Wheels
11	Prevail, Inc.
12	Shepherd’s Center
13	Trinity Free Clinic
14	HAND, Inc. (Owner Occupied Home Repair Partnership)
15	Eligible Storm Water Improvements
16	Unallocated PY2019 Social Services Activities (RFP for Transportation)

Table 55 – Project Information

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

AP-38 Project Summary

Project Summary Information

1	Project Name	Administration
	Target Area	County wide
	Goals Supported	Administration and Planning
	Needs Addressed	Administration and Planning
	Funding	CDBG: \$185,847
	Description	Provide administrative and Fair Housing services for the PY19 Hamilton County, Indiana CDBG program
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	320 Kings Lane
	Planned Activities	Noblesville Housing Authority will provide overall program management and oversee all program design and implementation activities of sub-recipients and contracted services.
2	Project Name	Carmel Infrastructure
	Target Area	Eligible Township Census Tracts
	Goals Supported	Public Infrastructure – Neighborhood Improvements
	Needs Addressed	Public Infrastructure and Facility Improvement
	Funding	CDBG: \$132,468.33
	Description	Carmel will use CDBG funds to fund eligible infrastructure activities

	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Unknown
	Location Description	A final location for the project is yet to be determined.
	Planned Activities	The city will use CDBG funding to provide infrastructure improvements in eligible census tracts; the specific project(s) have yet to be determined
3	Project Name	Fishers – Infrastructure activity
	Target Area	Eligible Township Census Tracts
	Goals Supported	Public Infrastructure – Neighborhood Improvements
	Needs Addressed	Public Infrastructure and Facility Improvement
	Funding	CDBG: \$132,258.77
	Description	Fishers will use CDBG funds to fund eligible infrastructure activities
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Unknown
	Location Description	A final location for the project is yet to be determined.
	Planned Activities	The city will use CDBG funding to provide infrastructure improvements in eligible census tracts; the specific project(s) have yet to be determined
4	Project Name	Noblesville – Infrastructure Activity
	Target Area	Eligible Township Census Tracts

	Goals Supported	Public Infrastructure – Neighborhood Improvements
	Needs Addressed	Public Infrastructure and Facility Improvement
	Funding	CDBG: \$89,435.67
	Description	Noblesville will use CDBG funds to fund eligible infrastructure activities
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Unknown
	Location Description	A final location for the project is yet to be determined.
	Planned Activities	The city will use CDBG funding to provide infrastructure improvements in eligible census tracts; the specific project(s) have yet to be determined
5	Project Name	Westfield – Infrastructure Improvements
	Target Area	Eligible Township Census Tracts
	Goals Supported	Public Infrastructure – Neighborhood Improvements
	Needs Addressed	Public Infrastructure and Facility Improvement
	Funding	CDBG: \$58,829.53
	Description	Westfield will use CDBG funds to fund eligible infrastructure activities
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Unknown
	Location Description	A final location for the project is yet to be determined.

	Planned Activities	The city will use CDBG funding to provide infrastructure improvements in eligible census tracts; the specific project(s) have yet to be determined
6	Project Name	Family Promise of Hamilton County
	Target Area	County wide
	Goals Supported	Homelessness
	Needs Addressed	Social Services General
	Funding	CDBG: \$7,000
	Description	CDBG funds will be used to provide case management and program services to families with children experiencing homelessness in Hamilton County.
	Target Date	9/30/2015
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 48 families/168 individuals will be served.
	Location Description	Noblesville, IN
	Planned Activities	Employment Training and Placement, Housing Counseling, Services for persons experiencing homelessness
7	Project Name	Good Samaritan Network
	Target Area	County wide
	Goals Supported	Self Sufficiency – Basic Public Services
	Needs Addressed	Social Services General Institutional Structure
	Funding	CDBG: \$41,300

	Description	The GSN Homeless Prevention program is designed to assist families so that they will not be faced with eviction, loss of shelter or socio-economic displacement. GSN does this by offering one-time rent or utility payments in critical times through vetted procedures. In 2018 GSN served 415 households with rental and shelter assistance funded with EFSP, GSN General Fund dollars, and CDBG funds.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Rent and mortgage assistance for 40-60 families
	Location Description	12933 Parkside Dr, Fishers, IN 46038
	Planned Activities	Homeless prevention; Referral/Implementation Administrative Coordinator (\$12,000), Program Administrative Assistant (\$4,000), Emergency Financial Assistance Payments (\$29,000)
8	Project Name	Hamilton County Harvest Food Bank
	Target Area	County wide
	Goals Supported	Self Sufficiency – Basic Public Services
	Needs Addressed	Social Services General
	Funding	CDBG: \$15, 221.25
	Description	The Meals for Kids Program partners with county agencies to provide Summer Lunch and School Weekend Meal Sack programs for children primarily enrolled in the Free and Reduced Lunch school programs. Hamilton County's Free and Reduced Lunch children population has grown by 14% in the last two school years. The Meals for Kids Programs provide breakfast and lunches to children during the Summer and on weekends and breaks during the school year. In 2018 approximately 1,371 children received a meal(s) through the Meals for Kids Program. Activity also includes the purchase of a one year site license subscription for the computer application "Food Bank Manager" to be located at the six participating school districts and one at the Hamilton County Harvest Food Bank.
	Target Date	9/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1,270 children will receive at least one meal through the Meals for Kids Program.
	Location Description	1605 N 10 th St, Noblesville, IN 46060
	Planned Activities	Other: Provision of Basic Needs (nutritional); Reimbursement of salary and expenses for a Meals for Kids Coordinator. Reimbursement for 7 "Food Bank Manager" computer program site licenses.
9	Project Name	HOPE Clinic
	Target Area	County wide
	Goals Supported	Self Sufficiency – Basic Public Services
	Needs Addressed	Social Services General
	Funding	CDBG: \$7,000
	Description	Preventative health screenings will include Hemoglobin A1c diabetes blood screening, colon cancer screening, prostate cancer screening, and blood screening for thyroid functions.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 160 patients are anticipated to take advantage of the health screenings.
	Location Description	1715 Stringtown Pike, Cicero, IN 46034
	Planned Activities	Other: Provision of Basic Needs (medical); Reimbursement for administrative fees (\$500), and reimbursement for health screening testing supplies (\$6,470).
10	Project Name	Meals on Wheels
	Target Area	County wide

	Goals Supported	Self Sufficiency – Basic Public Services
	Needs Addressed	Social Services General
	Funding	CDBG: \$7,200
	Description	Hot meals are prepared and delivered to Hamilton County seniors. Participating Seniors do not qualify for assistance through Medicaid or CICOA. Meals are prepared to meet individual client needs for those who suffer from chronic illness or disease. Activity is for reimbursement of the cost of meals.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	\$7,200 / \$4.95 Cost Per Meal = 1,454 Meals / 261 Delivery Days per year = Minimum 5 individuals provided meals
	Location Description	Meals on Wheels will deliver meals directly to low and moderate income individuals. Addresses vary throughout Hamilton County.
	Planned Activities	Senior Services; Reimbursement of the cost of hot meals.
11	Project Name	Prevail
	Target Area	County wide
	Goals Supported	Self Sufficiency – Basic Public Services
	Needs Addressed	Social Services – Special Needs
	Funding	CDBG: \$10,000
	Description	Prevail will use CDBG funding to provide advocacy and counseling services to Hamilton County victims of domestic violence.
	Target Date	9/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	Crisis intervention services provided will be provided to 300 victims of domestic violence. Restorative support services will be provided to 180 victims of domestic violence.
	Location Description	1100 S 9 th St # 100, Noblesville, IN 46060
	Planned Activities	Other: Services for Victims of Domestic Violence; Project Salaries (Self Sufficiency Advocate \$5,000) and Advocate (\$5,000)
12	Project Name	Shepherd's Center
	Target Area	County wide
	Goals Supported	Self Sufficiency – Basic Public Services
	Needs Addressed	Senior Services
	Funding	CDBG: \$15,000
	Description	The Community Caring Program provides services by matching volunteers with homebound, isolated and financially fragile seniors (62+). Services provided promote and support independent living for Hamilton County seniors. Hamilton County's senior population continues to increase perpetuating the growth and expansion of the Community Caring Program.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 175 Hamilton County Seniors will receive assistance from the Community Caring Program.
	Location Description	347 South 8 th Street, Noblesville, IN 46060
	Planned Activities	Senior services; Reimbursement of wages for Community Caring Program. (Director of Programs - \$10,752.00, Programs Assistant - \$5,148.00, and Community Caring Volunteer Coordinator - \$9,100.00)
13	Project Name	Trinity Free Clinic

	Target Area	County wide
	Goals Supported	Self Sufficiency – Basic Public Services
	Needs Addressed	Social Services General
	Funding	CDBG: \$20,000
	Description	Trinity will provide acute dental care to the uninsured, underinsured, and low/mod residents of Hamilton County. Starting in 2019, Trinity will begin providing dental care for children. Services will include dental exams, x-rays, plaque removal, fillings, tooth extractions and crown replacements as well as fluoride varnishes during pediatric clinics. Activity is for reimbursement of dental clinic assistant, contract dentist, and dental supplies.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1,200 dental patients will receive acute dental care during 1,825 dental visits.
	Location Description	14598 Oak Ridge Rd, Carmel, IN 46032
	Planned Activities	Other: Acute Dental Health Services; Reimbursement of wages for Dental Clinic Assistant - \$15,000, Contract Dentists - \$10,000, Bilingual Dental Clerk - \$10,000, and an Interpreter - \$5,000.
14	Project Name	HAND, Inc.
	Target Area	County wide
	Goals Supported	Housing – Owner Occupied Repair
	Needs Addressed	General Housing
	Funding	CDBG: \$200,000

	Description	Home Repair Program is partnership between HAND, Habitat, and Shepherd's Center. Home repairs range from minor (widening doorways, adding ramps, and installing grab bars) to major (roofs, windows, doors, and HVAC). Since its inception in 2018, the Home Repair Partnership now has 80 households on its waiting list.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	12-20 low/mod income owner occupied home repairs will be completed
	Location Description	Various addresses, yet to be determined. All homeowners will need to document income of the household to qualify for the program.
	Planned Activities	Owner Occupied Repair; Reimbursement for 12-20 low to moderate income owner-occupied home repairs - Admin (\$40,000), Construction (\$160,000).
15	Project Name	Eligible Stormwater Improvements
	Target Area	County wide
	Goals Supported	Infrastructure
	Needs Addressed	Infrastructure
	Funding	\$284,344.36
	Description	Hamilton County Storm Water Rehabilitation project in the Home Place neighborhood in southern Clay Township
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Unknown

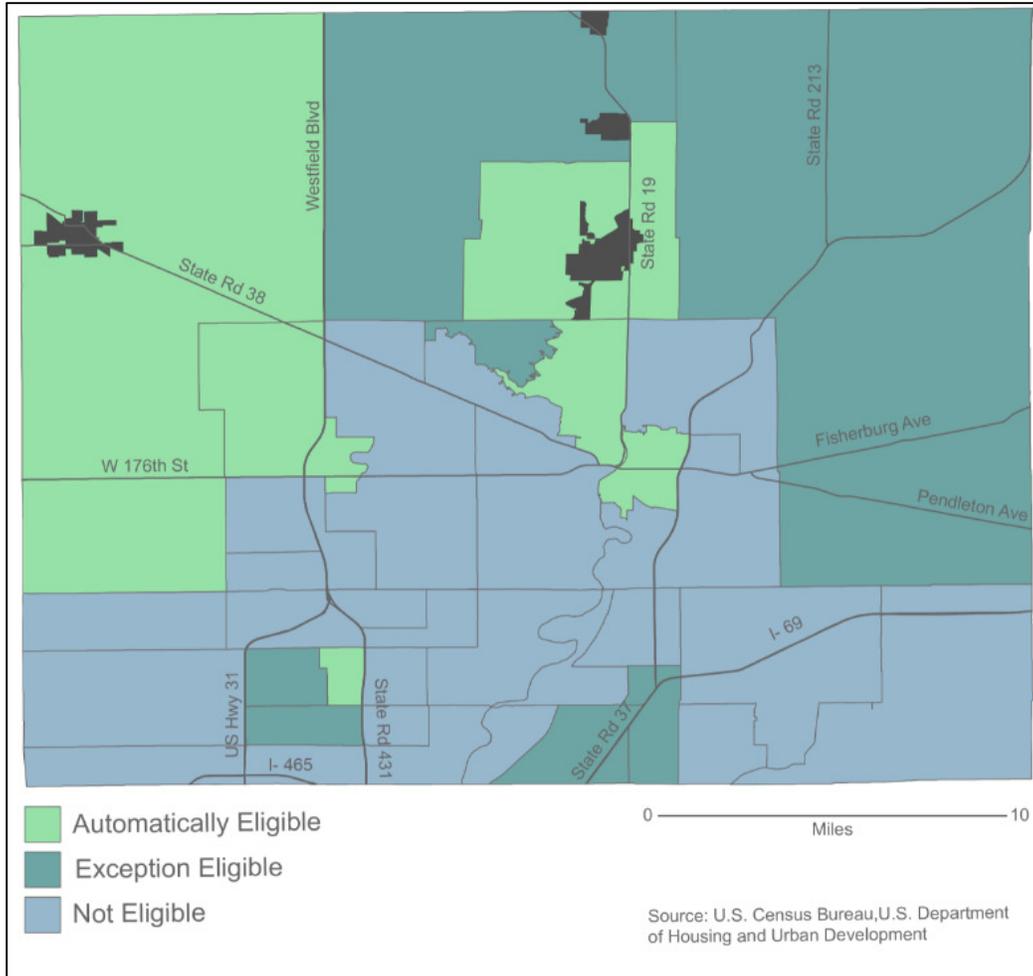
	Location Description	Home Place neighborhood in southern Clay Township
	Planned Activities	Hamilton County Storm Water Rehabilitation project
16	Project Name	Unallocated PY2019 Social Services Activities (RFP for Transportation)
	Target Area	County wide
	Goals Supported	Services - transportation
	Needs Addressed	Transportation
	Funding	\$32,150.90
	Description	Hamilton County has limited public transportation and no fixed-route services. The existing options require a 24-hour notice. Additional public transportation options throughout the county are needed.
	Target Date	9/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Unknown
	Location Description	County wide
	Planned Activities	Public transportation services

AP-50 Geographic Distribution – 91.220(f)

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

A place-based CDBG funded project, oftentimes referred to as the “Low Mod Area Benefit”, is a project in which CDBG funds are directed to a designated area rather than to specific individuals or households. In other words, funds can be used to improve a neighborhood even if some of those living in the neighborhood that will benefit from the funds are middle income or upper income households. Activities may qualify for CDBG assistance if the activity will benefit all the residents of a primarily residential area where at least 51 percent of the residents are low- and moderate-income persons, i.e. area-benefit (LMA). Such area-benefit activities include things such as acquisition of land to be used as a neighborhood park, construction of a health clinic or other community center/facility, improvements to public infrastructure, etc. Currently Hamilton County has 12 area-benefit eligible block groups.

In addition to the automatically eligible areas, HUD allows for an exception for select communities given that “some communities have no or very few areas in which 51 percent of the residents are low- and moderate-income. For these grantees, the CDBG law authorizes an exception criterion for such grantees to be able to undertake area benefit activities. Specifically, section 105(c)(2)(A)(ii) of the Housing and Community Development Act of 1974, as amended, states that an activity shall be considered to principally benefit low and moderate income persons when the area served by such activity is within the highest quartile of all areas within the jurisdiction of such city or county in terms of the degree of concentration of persons of low and moderate income.” Thus, each “exception grantee” has a personalized threshold, which “represents the minimum percentage of low- and moderate-income persons that must reside in the service area of an area benefit activity for the activity to be assisted with CDBG funds.” (HUD) The 2019 exception thresholds are based on the 2011-2015 American Community Survey (ACS). Hamilton County has historically been and continues to be an exception grantee. The 2019 fiscal year exception threshold for Hamilton County is 37.83 percent; this represents the minimum percentage of low and moderate income persons that must reside in the service area of an area benefit activity for the activity to be assisted with CDBG funds. The following table and corresponding map illustrates the automatically eligible and exception eligible areas in Hamilton County in 2019 for activities to be assisted with CDBG funds.



Note: Blacked out areas are the towns which have opted out of the Hamilton County CDBG program.
 Source: Novogradac & Company LLP, June 2019

AREA-BENEFIT ELIGIBLE AREAS*

Census Tract	Block Group	Number of Low-Mod Persons	Percentage of Low-Mod Persons	Census Tract	Block Group	Number of Low-Mod Persons	Percentage of Low-Mod Persons
<i>Automatically Eligible</i>				<i>Exception Eligible</i>			
110509	2	945	76.52%	110201	1	390	49.06%
110700	2	935	71.92%	110201	3	395	47.31%
110700	1	995	70.82%	110401	1	930	46.62%
110202	2	480	67.13%	111007	2	570	46.15%
110300	4	520	61.90%	110807	2	745	45.71%
110300	5	585	59.69%	111006	2	1,245	45.52%
110202	4	710	56.35%	110700	3	275	41.98%
111007	1	1,245	55.46%	110201	2	465	40.26%
110600	3	845	55.23%	110810	2	600	40.00%
110300	2	1,540	54.51%	111008	1	1,380	39.83%
110600	2	660	53.44%	110512	1	965	39.47%
110401	2	615	52.12%	110100	3	2,865	38.69%
				110600	1	455	38.40%

*Includes automatically eligible (shaded) and exemption eligible areas.

Source: Novogradac & Company LLP, June 2019

As illustrated, using the exception threshold allows for twice as many area-benefit eligible areas throughout the county though the majority of the eligible areas are still located in the central and northern areas of the county.

Geographic Distribution

Target Area	Percentage of Funds
County wide	60
City of Fishers	13
City of Carmel	13
City of Noblesville	9
City of Westfield	6

Table 56 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

CDBG funds will be concentrated in those block groups with at least 37.83 percent low and moderate-income households. When a compelling community development need arises in other areas, the County will evaluate the potential benefit to low and moderate households as well as the County's overall objectives contained in the Consolidated Plan. Approximately 40 percent of the annual CDBG budget in Hamilton County is allocated to participating communities for infrastructure projects in eligible areas. The projects typically include stormwater/sewer improvements, ADA compliance and sidewalk improvements. The county also commits funding for housing activities and public service activities. While many of the recipients of these services live in eligible census tracts the services are based upon income eligibility of the clients.

Discussion

Please see discussion points in the sections above.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The NHA will utilize CDBG dollars primarily to preserve affordable housing through the rehabilitation of existing units and to create new affordable housing, particularly for senior citizens. Specific projects have yet to be determined and as such are difficult to quantify. The Home Repair Partnership is estimated to repair between 12 and 20 homes in PY19. Given that the home repair projects have yet to be identified and that there are no large planned projects in the pipeline that will utilize CDBG funds, the numbers for the following table are to be determined.

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

Table 57 - One Year Goals for Affordable Housing by Support Requirement

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

Table 58 - One Year Goals for Affordable Housing by Support Type

Discussion

There are no planned additions to the affordable housing supply in PY19 using CDBG funds. CDBG funds will however be used to fund home repairs for low to moderate income households; an estimated 12 to 20 homes will be repaired in PY19. Additionally, two of the public service grants are to organizations to provide emergency or temporary housing assistance; these programs are estimated to serve approximately 75 individuals.

AP-60 Public Housing – 91.220(h)

Introduction

The NHA is the public housing agency for Hamilton County. The NHA does not manage public housing units as do many of its neighboring housing agencies in Anderson and Indianapolis. The Noblesville Housing Authority does offer Section 8 Housing Choice Vouchers to the low-income households.

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

The most immediate need for the NHA is finding additional funding to provide voucher assistance. The waiting list is currently closed. The waiting list was last opened from October 2-9, 2018 during which 1,443 applications were received. Turnover of vouchers is slow as most households do not “graduate” from needing a subsidy. Most voucher holders are elderly and disabled, returning their voucher when they cannot live independently or pass away. Given the limited number of vouchers administered and the low turnover among households receiving this rental assistance subsidy, the NHA selected only 200 applicants from the applicant pool based on local preferences and a lottery system to add to the waiting list. Preferences include applicants who live or work in Hamilton County (30 points), elderly or disabled (10 points), applicants who live or work in Indiana (10 points), and veterans or surviving spouses of veterans (five points). There are currently 166 households on the waiting list including 47 that have a household member with a disability, 19 of whom are elderly households, and 97 of whom are families with children. Additionally approximately 54 percent (89 households) are extremely low-income, 40 percent (66 households) are very low income, six percent (ten households) are low income, and one is over the income limit. The average wait for selected applicants is currently 270 days. Demand for new vouchers has increased with the cost burden of housing in Hamilton County increasing for many families, including the elderly.

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

The NHA does not manage public housing units. The NHA does however administer a Section 8 Housing Choice Voucher program, a tenant based rental assistance program. Voucher recipients are provided information about service programs near the housing of their choosing.

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

The Noblesville Housing Authority is not designated as troubled.

Discussion

The most immediate need for the NHA is finding additional funding to provide voucher assistance. Turnover of vouchers is low which may be in part because the majority of voucher holders

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

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

Introduction

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

With the amount of wealth in Hamilton County, homelessness is a hidden and misunderstood issue in the community. According to the most recent homeless count, on average 19 adults and 174 children are homeless in any given month in Hamilton County. The recent counts represent an increase over the 2013 numbers when 11 homeless individuals and 146 children were counted as experiencing homelessness in Hamilton County. Consultations confirm the aforementioned trend of an increasing homeless population in Hamilton County. This hidden population is now on the forefront for many urban counties.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

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

The Indiana Balance of State Continuum of Care includes 91 of the 92 counties in the state. These 91 counties are divided into 16 regions and each region is overseen by a regional planning council and chairperson. Hamilton County is part of Region 8 in the Indiana Balance of State CoC along with Boone, Hendricks, Madison, and Hancock Counties. The Region 8 CoC works with a variety of providers in Hamilton County including, but not limited to: GSN, Prevail, Township Trustee offices, Third Phase, Family Promise, Aspire Indiana, Community Corrections, and the Noblesville Housing Authority. While there are no specific CoC goals for the upcoming year, the CoC will continue to work with local service providers to address the needs of the homeless in the county.

There are two activities being carried out in PY19 to help address some of the homeless and near homeless individuals in Hamilton County. They are:

Family Promise of Hamilton County is receiving \$7,000 of CDBG funding to provide case management and program services for families in need of temporary housing and other related services to Hamilton County.

Good Samaritan Network is receiving \$41,300 in CDBG funding to assist households threatened with homelessness with rent/utility assistance.

Addressing the emergency shelter and transitional housing needs of homeless persons

While not a goal for the first year of the Consolidated Plan, Hamilton County, the Region 8 Planning Council and the Good Samaritan Network are working together to develop an emergency shelter for domestic violence victims. This will be the second emergency shelter to serve Hamilton County and the first to serve a subpopulation of the homeless population. Private and public partners are working together to find funding resources to match Community Development Block Grant dollars for the development. One private partner with experience in operating a shelter, Alternatives from Anderson, has already come forward as a potential group to run the shelter.

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

There are no permanent supportive housing units provided in the county and the development of these units will face all of the aforementioned barriers to the provision of affordable housing in the county. As such, continued support for both organizations and service providers who provide emergency assistance as well as those that provide general permanent affordable housing opportunities, as well as promotion of increased collaboration and cooperation between these organizations, will continue to be an important strategy for the county.

There are two activities being carried out in PY19 to help address some of the homeless and near homeless individuals in Hamilton County. They are:

Family Promise of Hamilton County is receiving \$7,000 of CDBG funding to provide case management and program services for families in need of temporary housing and other related services to Hamilton County.

Prevail, Inc. is receiving \$10,000 of CDBG funding to provide self sufficiency and support advocacy for victims of domestic violence.

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

Limited financial resources prohibit the Hamilton County Commissioners (HCC) from supporting any one project or program with a significant amount of funds. The HCC can spend up to 15 percent of its annual allocation towards public services. One goal identified in this Consolidated Plan is to support programs that help the most vulnerable households achieve self-sufficiency including additional case management services. Public service programs such as case management services, food pantries, legal services, health services, childcare, transportation and fair housing will be funded under this goal in the next five years.

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

Introduction:

While barriers to affordable housing can come from anywhere, the U.S. Department of Housing and Urban Development (HUD) recognizes universal barriers. Local and state regulations on zoning and building are often the most recognized barriers to affordable housing.

On June 21, 2017, Fair Housing Center of Central Indiana, Inc. (FHCCI) filed a complaint against Hamilton County, Indiana (CDBG recipient) and the City of Noblesville, Indiana (CDBG sub-recipient) with HUD. The complaint alleges that the City of Noblesville violated the Fair Housing Act by implementing two municipal zoning ordinances that discriminate on the basis of familial status, race and national origin. Additionally, the complaint was filed under Title VI of the Civil Rights Act on the basis of race and national origin. The complaint was brought against both the city and the county, but Hamilton County, as the grantee, has the ultimate responsibility for compliance of its sub-grantees, which in this case was the City of Noblesville. According to the complaint, in 2015 the City of Noblesville was awarded \$95,334 in CDBG funds for public infrastructure improvements, namely 2,575 linear feet of sidewalk on Pleasant and Walnut Streets. The complaint indicates that while the 2016 Analysis of Impediments to Fair Housing for Fair Housing “did not find any regulatory impediments to fair housing choice”, that there were in fact two ordinances passed in Noblesville, one in 2008 and one in 2013, that the complainant claims do just that. The 2008 ordinance prohibits rent subsidized to be sought or accepted from any federal, state, or local government and the 2013 explicit prohibits subsidized housing.

The parties have since entered into a Voluntary Compliance Agreement on October 8, 2018. As part of the agreement, Hamilton County will convene a Working Group, headed by the Noblesville Housing Authority (in its capacity as administrator of Recipient’s community development funds), and comprised of subrecipient officials (or their designees), township trustees (or their designees), HAND, Inc., and other organizations or government officials that may be deemed appropriate.” The requirements of the Working Group are included in the full settlement agreement which is attached to this Consolidated Plan. The aforementioned ordinances were amended on June 25, 2019.

In addition to the aforementioned regulatory barriers, the consultation process identified several additional barriers to affordable housing development. These include:

- Inadequate supply of affordable housing suggests a history of barriers to new development
- High costs of property acquisition near amenities in the more developed communities of Hamilton County, such as Carmel, Fishers, Noblesville and Westfield
- City architectural standards
- A limited supply of housing units where a Section 8 Housing Choice Vouchers can be used
- A lack of transportation where creation of affordable housing development is less of a financial challenge

- A lack of amenities such as grocery stores in areas where there is less opposition to affordable housing which subsequently renders these locations uncompetitive for LIHTC funds from the state.
- Insufficient state and federal resources for affordable housing programs
- NIMBY-ism (Not-in-my-back-yard)

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

To help the community as a whole overcome the barriers to affordable housing development, and also maximize the impact in the community, Hamilton County will strive to achieve the following goals.

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

Discussion:

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

- Select target areas based on potential competitiveness given the statewide qualified allocation plan for LIHTCs.
- Attract for-profit developers to partner with non-profit service agencies to develop affordable housing development for extremely low-income families; connecting services and rental assistance with new developments
- Build projects without long-term debt to help fund operations and maintenance of property
- Advocate for public and private transportation options for low income families living outside of walking distance of amenities needed for daily living, such as grocery stores, health care and employment options
- Enlist all levels of City government to be “cheerleaders” for affordable housing
- Feed positive stories to media outlets to counter negative stories oriented from the urban core

Hamilton County will seek private/public partnerships to help achieve these goals and target communities working together to increase affordable housing options. Both of these key ingredients will help achieve the goals while addressing some of the biggest barriers to affordable housing development, such as educating the public and civic leaders about affordable housing, advocating for transportation options in all areas of the community and working together to attract additional subsidy to overcome high cost of property acquisition.

While this does not mean a goal for direct development of affordable housing, the indirect effect of advocacy can open the minds of leaders in the community that believe affordable housing is not necessary in Hamilton County. Through consultations, Hamilton County faces an uphill battle when it comes to the development or need for development of affordable housing when it has the reputation of one of the wealthiest counties in Indiana. Having an advocate on behalf of grassroots developers, such as HAND, Inc. and Habitat for Humanity, will help with the financing and development of affordable housing in the future.

Additionally, over the next year the CDBG program will continue to promote and enhance affordable housing opportunities through its home repair program.

AP-85 Other Actions – 91.220(k)

Introduction:

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

Actions planned to address obstacles to meeting underserved needs

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

During PY19, NHA proposes funding for the following organizations to serve the needs of the underserved: Family Promise of Hamilton County, GSN, Hamilton County Harvest Food Bank, Hope Family Care Center, Meals on Wheels, Prevail, Inc., Shepherd's Center, and Trinity Free Clinic.

Actions planned to foster and maintain affordable housing

In general, the NHA will support programs that provide rehabilitation and/or emergency repairs to address safety, health and/or accessibility issues of housing units occupied by extremely low to moderate income households

During PY19, NHA proposes continued funding of the Hamilton County Home Repair Partnership in the amount of \$200,000. Through this program, Hamilton County will preserve the affordable housing stock by improving quality.

Actions planned to reduce lead-based paint hazards

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

During PY19 the Hamilton County CDBG program expects to provide home repairs to an unknown number of homes. Lead hazards will be addressed as described in the policies and procedures manual.

Actions planned to reduce the number of poverty-level families

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

- Promote economic empowerment by supporting facilities, services and activities aimed at developing the self-sufficiency for all low to moderate-income residents. Programs and activities to be supported over the next five years include: Transportation services, child care services, healthcare, food banks
- Provide affordable housing opportunities to low and moderate-income households. Support the development of housing for extremely low income households, particularly those earning less than 30 percent of the area median income. Develop a funding resource for households that do not meet the HUD income requirements but are at-risk of losing their housing.
- Continue to work with local agencies to identify barriers and issues related to poverty and support programs that will help low to moderate-income households overcome those barriers.

During PY19, the Hamilton County CDBG program will provide \$15,221.25 to Hamilton County Harvest Food Bank, \$10,500 to Meals on Wheels and \$32,150.90 in unallocated funds for transportation services.

While no CDBG funding will be made available during PY19 that specifically addresses this need, the Hamilton County Economic Development Corporation continually strives to bring jobs and job training to Hamilton County.

Actions planned to develop institutional structure

Through administrative efforts and partnerships in the community, the NHA will work to increase coordination across Hamilton County, with the intended outcome of improving services for low-income households. The GSN is expected to continue to provide an outlet for this coordination and capacity building. Additionally, the NHA continues to work with the County Commissioners to improve coordination of efforts regarding the planning and use of county discretionary funds relative to the CDBG program.

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

The GSN is the primary way to connect all service providers throughout Hamilton County. For a small annual fee of \$20, an organization will be provided with a general membership to the network which includes access to member directories.

The Hamilton County CDBG program wants to support and expand the efforts of this organization to not

only build up the capacity of its members, but to also connect the members to local affordable housing providers and the Region 8 Planning Council for the Indiana Continuum of Care. By connecting the three different organizations, planning efforts will be more streamlined and projects developed from those efforts will go more to address the households and individuals with the most need.

During PY19, the Hamilton County CDBG program will continue to work with housing partners and social service agencies to explore partnerships and coordinate activities.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Community Development Block Grant funds are the only funding resource the Noblesville Housing Authority anticipates for fiscal year 2019. The Cities of Carmel, Fishers, Noblesville and Westfield all have funding from previous fiscal years that may be used for public infrastructure improvements; collectively this equates to \$175,920.80. Additionally, Habitat of Humanity of Hamilton County had a repayment of \$29,654.11 on May 30, 2019 (IDIS Activity Number 221). Funds were initially used to purchase the single-family home located at 1220 S. 8th Street in Noblesville for the purpose of rehabilitating the home by Habitat for an income-eligible family. The home was not rehabilitated and later sold to an individual who was not income qualified without notice to HUD, Hamilton County, or the NHA. Upon being informed, Hamilton County and NHA worked with CPD to resolve the situation with Habitat. As the activity did not a national objective, the funds were returned. Together these funds will be used for a Hamilton County Storm Water Rehabilitation project located in the Home Place neighborhood in southern Clay Township.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
---	---

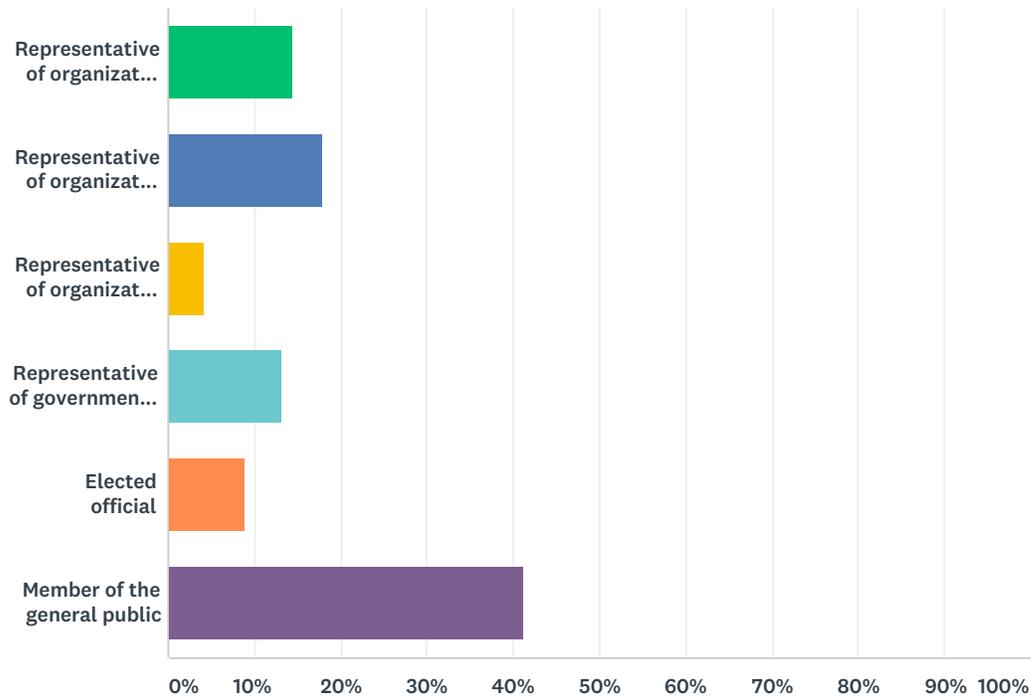
Appendix - Alternate/Local Data Sources

1	Data Source Name 2019 Hamilton County Consolidated Plan Survey
	List the name of the organization or individual who originated the data set. Novogradac & Company LLP
	Provide a brief summary of the data set. The data set consists of 170 responses
	What was the purpose for developing this data set? To collect stakeholder and public feedback on the needs and priorities for the Consolidated Plan
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? The survey was distributed at the GSN Resource Fair in May 2019 which was attended by both CDBG eligible sub-beneficiaries and households alike. While the total number of responses is low relative to the countywide population, the response rate is significantly higher than that in previous plans.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? May 2019
	What is the status of the data set (complete, in progress, or planned)? The data collection period is closed
2	Data Source Name 2018 Hamilton County Housing Needs Assessment
	List the name of the organization or individual who originated the data set. Novogradac & Company LLP

	<p>Provide a brief summary of the data set.</p> <p>The profile is a narrative of housing needs in Hamilton County and includes a community profile as well as an analysis of both the existing and planned supply and demand for owner and rental units throughout the county. A wide range of secondary data sources are incorporated into the narrative including ACS data, HUD data, and proprietary ESRI data as well as primary data sources including interviews with property managers at existing subsidized, affordable, and market rate rental properties in the county; six stakeholder and public listening sessions; and one online survey with 603 responses.</p>
	<p>What was the purpose for developing this data set?</p> <p>The data sets used in the report were collected in order to complete a county-wide housing needs assessment.</p>
	<p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>Data is provided at both the county and city/town level.</p>
	<p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>July 2018</p>
	<p>What is the status of the data set (complete, in progress, or planned)?</p> <p>Complete</p>

Q1 Which of the following best identifies your role relative to the CDBG program?

Answered: 167 Skipped: 3



ANSWER CHOICES	RESPONSES	
Representative of organization that applies for CDBG funds	14.37%	24
Representative of organization that receives CDBG funds	17.96%	30
Representative of organization interested in applying for CDBG fund	4.19%	7
Representative of government agency	13.17%	22
Elected official	8.98%	15
Member of the general public	41.32%	69
TOTAL		167

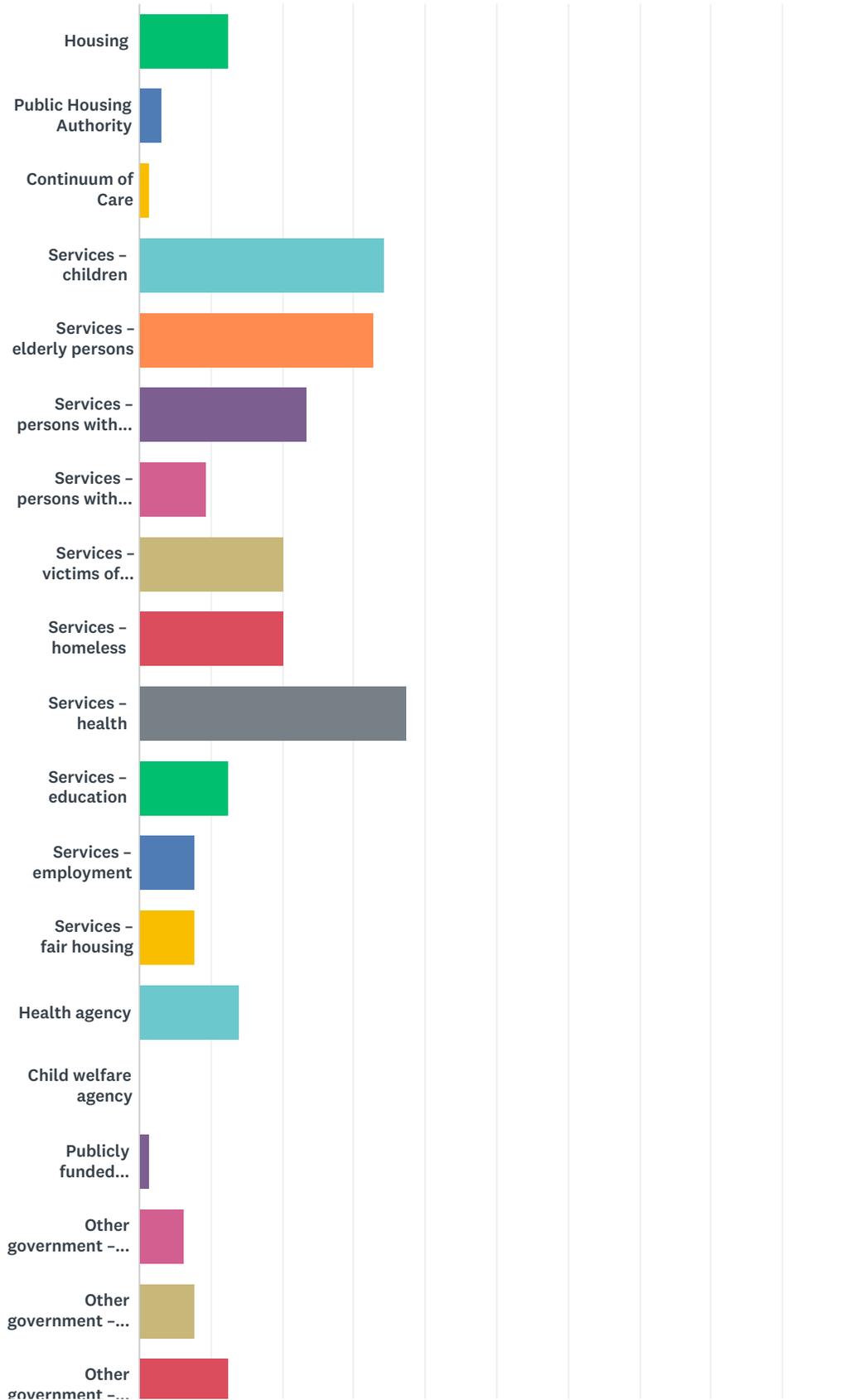
Q2 Please provide information on your organization below.

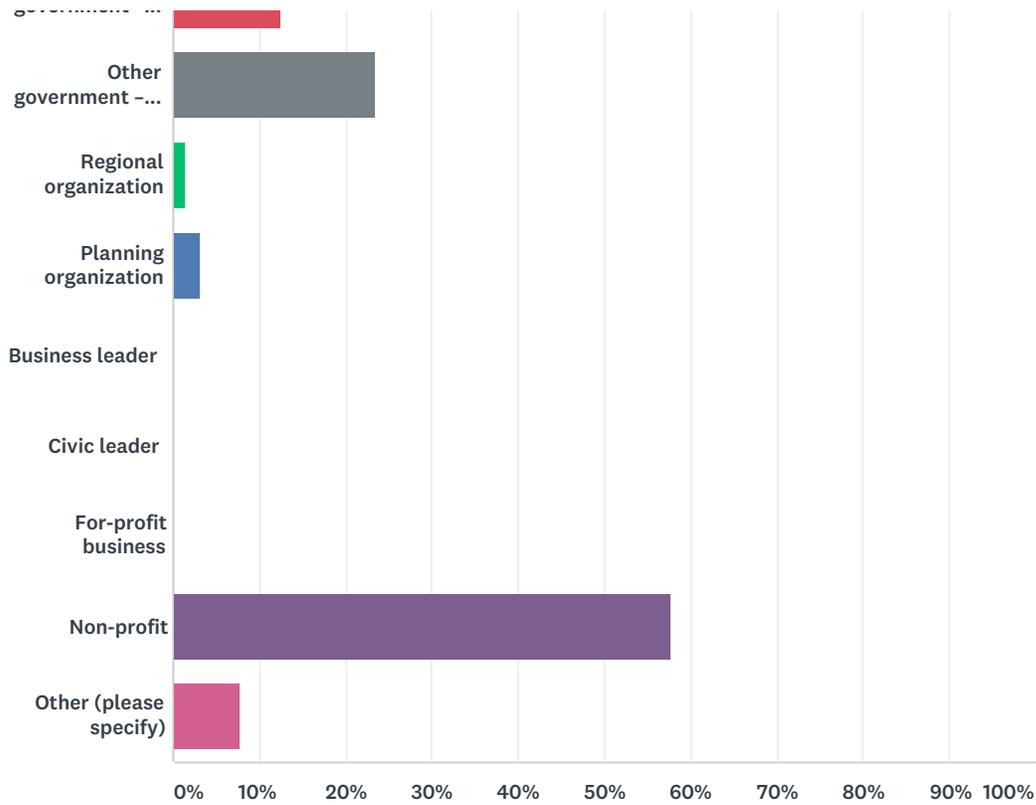
Answered: 60 Skipped: 110

ANSWER CHOICES	RESPONSES	
Name of organization	100.00%	60
Name of person completing the survey	100.00%	60
Title of person completing the survey	98.33%	59
Address of organization	100.00%	60
URL of organization	65.00%	39
State/Province	0.00%	0
ZIP/Postal Code	0.00%	0
Country	0.00%	0
Email Address	0.00%	0
Phone Number	0.00%	0

Q3 Stakeholder Type (check all that apply):

Answered: 64 Skipped: 106





ANSWER CHOICES	RESPONSES	
Housing	12.50%	8
Public Housing Authority	3.13%	2
Continuum of Care	1.56%	1
Services – children	34.38%	22
Services – elderly persons	32.81%	21
Services – persons with disabilities	23.44%	15
Services – persons with HIV/AIDS	9.38%	6
Services – victims of domestic violence	20.31%	13
Services – homeless	20.31%	13
Services – health	37.50%	24
Services – education	12.50%	8
Services – employment	7.81%	5
Services – fair housing	7.81%	5
Health agency	14.06%	9
Child welfare agency	0.00%	0
Publicly funded institution/system of care	1.56%	1
Other government – federal	6.25%	4
Other government – state	7.81%	5

Other government – county	12.50%	8
Other government – local	23.44%	15
Regional organization	1.56%	1
Planning organization	3.13%	2
Business leader	0.00%	0
Civic leader	0.00%	0
For-profit business	0.00%	0
Non-profit	57.81%	37
Other (please specify)	7.81%	5
Total Respondents: 64		

Q4 What is your organization's mission and principal services provided by your organization?

Answered: 60 Skipped: 110

Q5 What is the geographic service area of your organization?

Answered: 62 Skipped: 108

Q6 What target population is served by your organization?

Answered: 61 Skipped: 109

Q7 What do you consider the greatest housing needs and issues facing Hamilton County?

Answered: 108 Skipped: 62

Q7 What do you consider the greatest housing needs and issues facing Hamilton County?

homes emergency homeless Access rent Affordable low cost Hamilton County
shelters housing senior citizens families work housing lack
affordable housing enough low income
single need options Safe single parent affordability decent
lack affordable housing income live low

Q8 What do you consider the greatest non-housing community needs and issues facing Hamilton County?

Answered: 108 Skipped: 62

Q9 What, if any, specific geographic area(s) in Hamilton County should be prioritized for assistance?

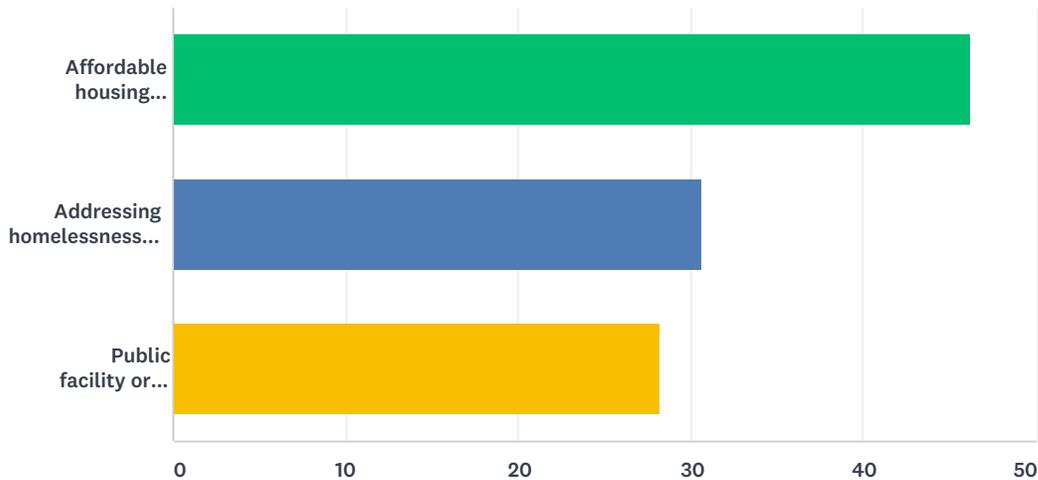
Answered: 87 Skipped: 83

Q9 What, if any, specific geographic area(s) in Hamilton County should be prioritized for assistance?

areas
need Towns Westfield Downtown need Westfield Fishers Northern low
Hamilton County low income areas greater
Noblesville population Sheridan south county poverty N
Carmel rural north

Q10 Please allocate 100 percentage points across the following three general needs categories (affordable housing, addressing homelessness, or non-housing community needs) according to your perceived value as it relates to the priorities for CDBG funds.

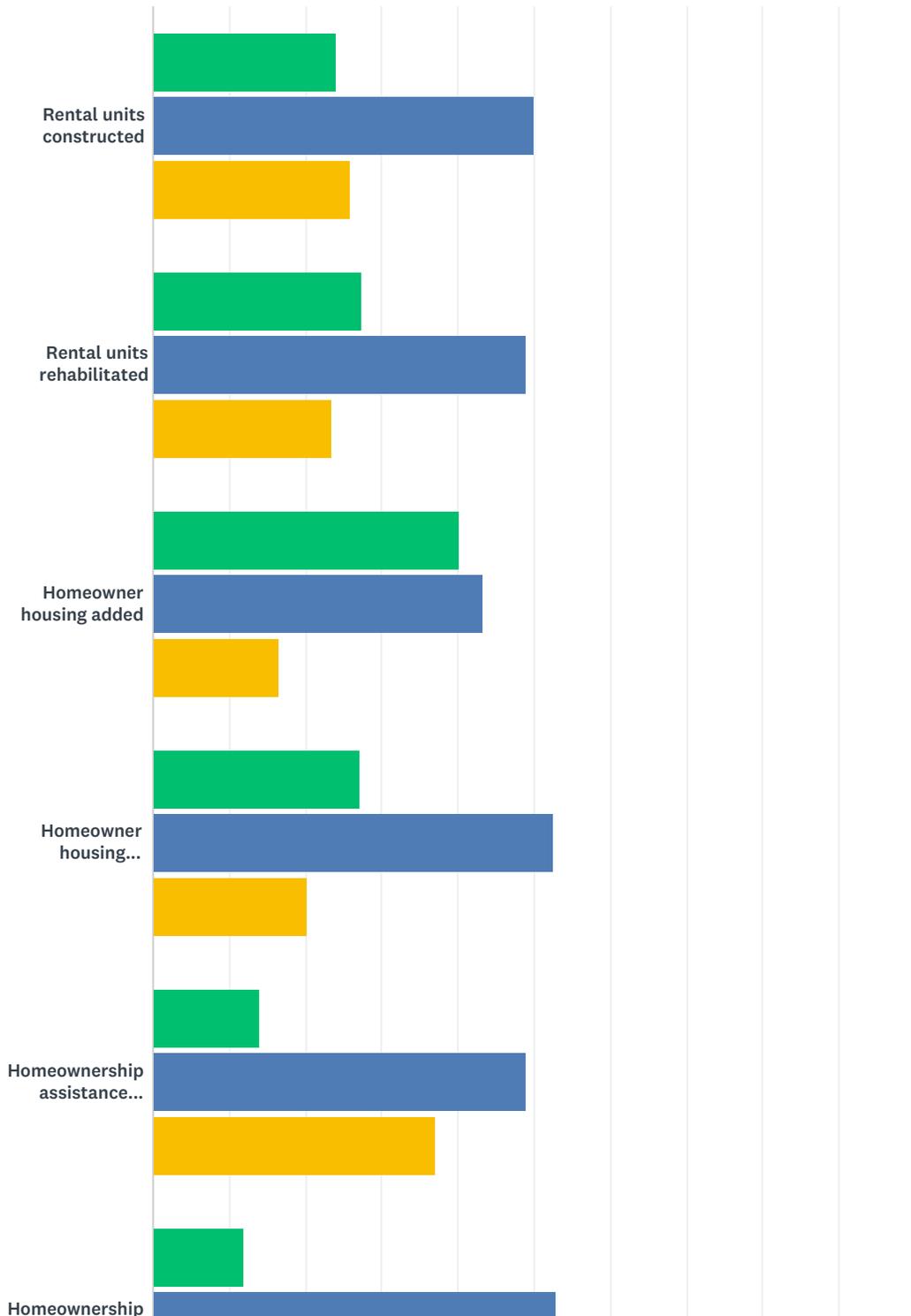
Answered: 109 Skipped: 61

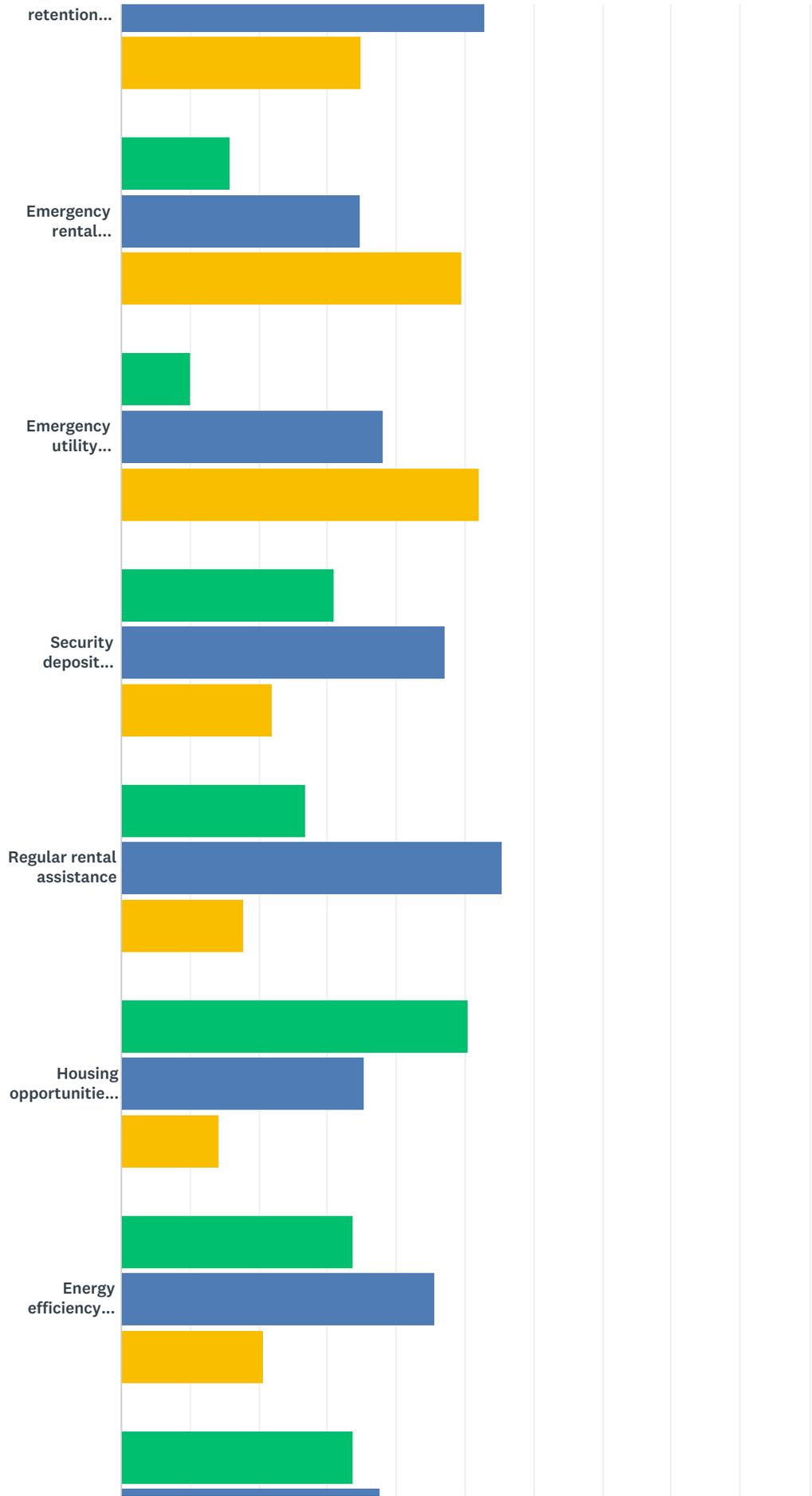


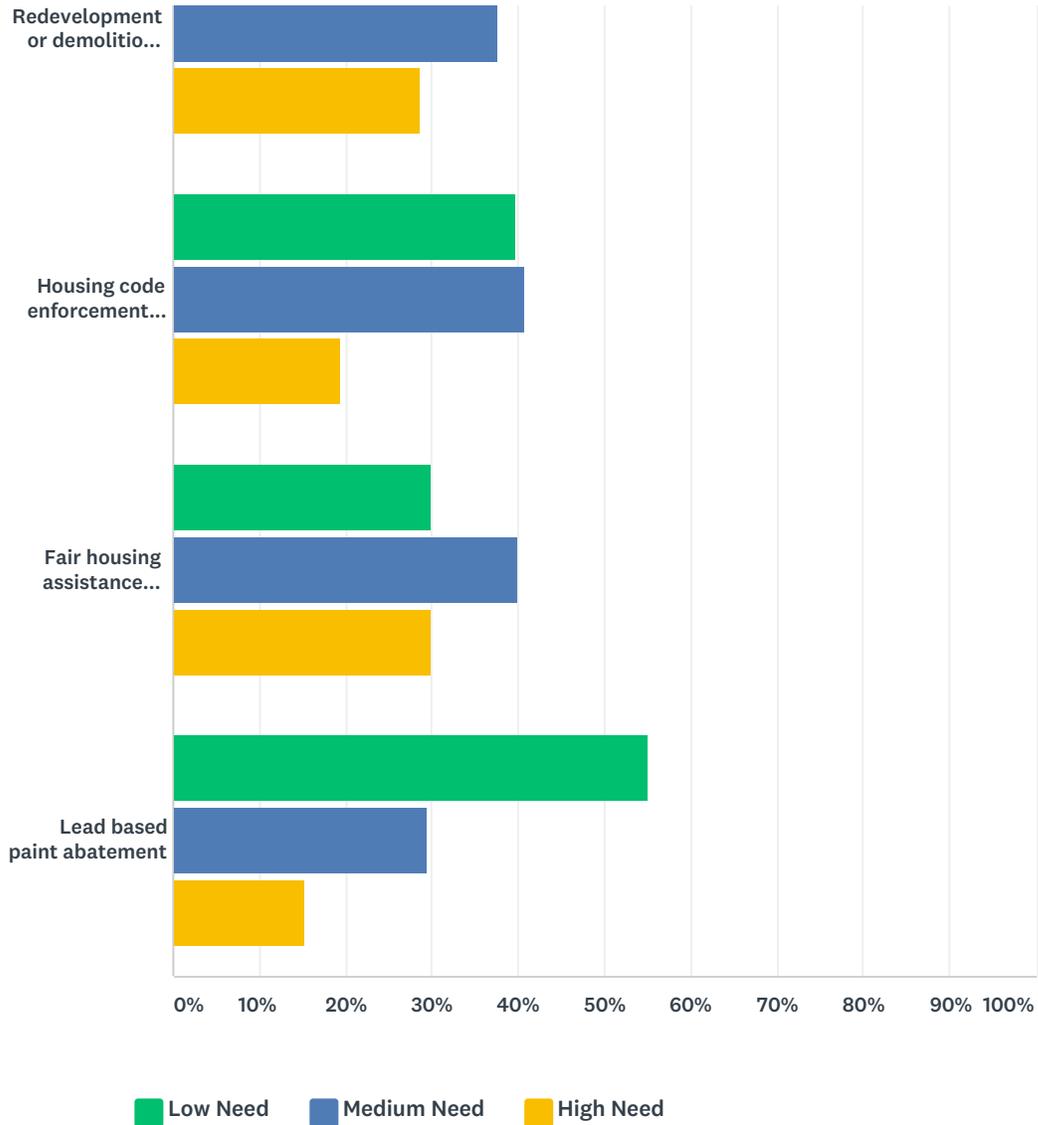
ANSWER CHOICES	AVERAGE NUMBER	TOTAL NUMBER	RESPONSES
Affordable housing (rental and homebuyer assistance, production of new units, rehabilitation of existing units, acquisition of existing units)	46	4,905	106
Addressing homelessness (outreach, emergency shelter and transitional housing, rapid re-housing, prevention)	31	3,033	99
Public facility or infrastructure activities (non-housing related needs)	28	2,962	105
Total Respondents: 109			

Q11 Please rank the following needs on a scale ranging from Low Need (may be beneficial but federal funds should not be used for this purpose) to Medium Need (some federal funding and other sources of funding should be used for this purpose) to High Need (federal funding should be used for this purpose).

Answered: 102 Skipped: 68





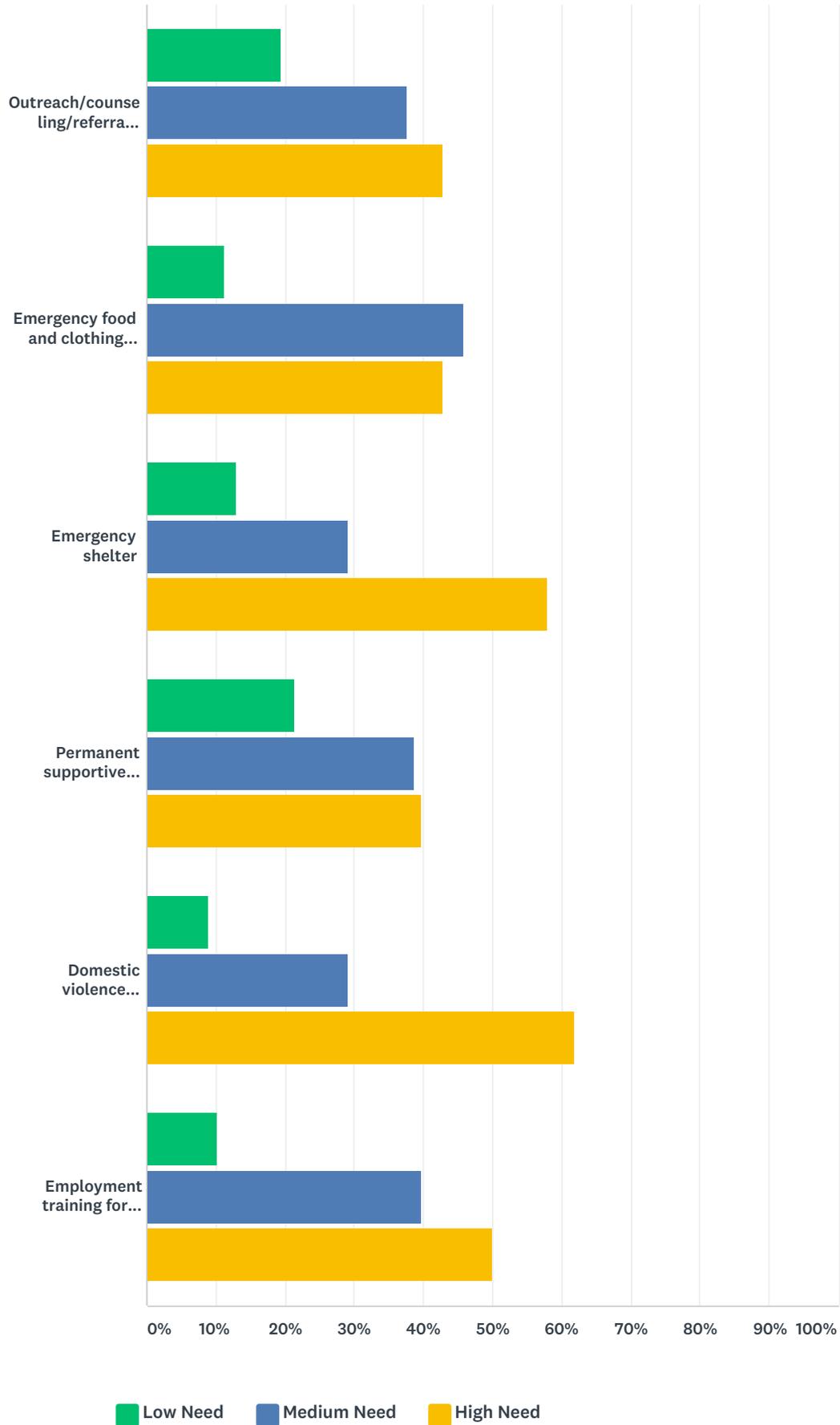


	LOW NEED	MEDIUM NEED	HIGH NEED	TOTAL	WEIGHTED AVERAGE
Rental units constructed	24.00% 24	50.00% 50	26.00% 26	100	2.02
Rental units rehabilitated	27.45% 28	49.02% 50	23.53% 24	102	1.96
Homeowner housing added	40.21% 39	43.30% 42	16.49% 16	97	1.76
Homeowner housing rehabilitated	27.27% 27	52.53% 52	20.20% 20	99	1.93
Homeownership assistance (down payment, low-interest loans)	14.00% 14	49.00% 49	37.00% 37	100	2.23
Homeownership retention (foreclosure/homeless prevention)	12.00% 12	53.00% 53	35.00% 35	100	2.23
Emergency rental assistance (eviction/homeless prevention)	15.84% 16	34.65% 35	49.50% 50	101	2.34
Emergency utility assistance (avoid utility cutoff)	10.00% 10	38.00% 38	52.00% 52	100	2.42

Security deposit assistance	31.00% 31	47.00% 47	22.00% 22	100	1.91
Regular rental assistance	26.73% 27	55.45% 56	17.82% 18	101	1.91
Housing opportunities for persons with HIV/AIDS	50.51% 50	35.35% 35	14.14% 14	99	1.64
Energy efficiency improvements to current housing	33.66% 34	45.54% 46	20.79% 21	101	1.87
Redevelopment or demolition of abandoned residential properties	33.66% 34	37.62% 38	28.71% 29	101	1.95
Housing code enforcement efforts	39.80% 39	40.82% 40	19.39% 19	98	1.80
Fair housing assistance (complaint investigation, counseling, education, and identifying and removing barriers to fair housing)	30.00% 30	40.00% 40	30.00% 30	100	2.00
Lead based paint abatement	55.10% 54	29.59% 29	15.31% 15	98	1.60

Q12 Please rank the following needs on a scale ranging from Low Need (may be beneficial but federal funds should not be used for this purpose) to Medium Need (some federal funding and other sources of funding should be used for this purpose) to High Need (federal funding should be used for this purpose).

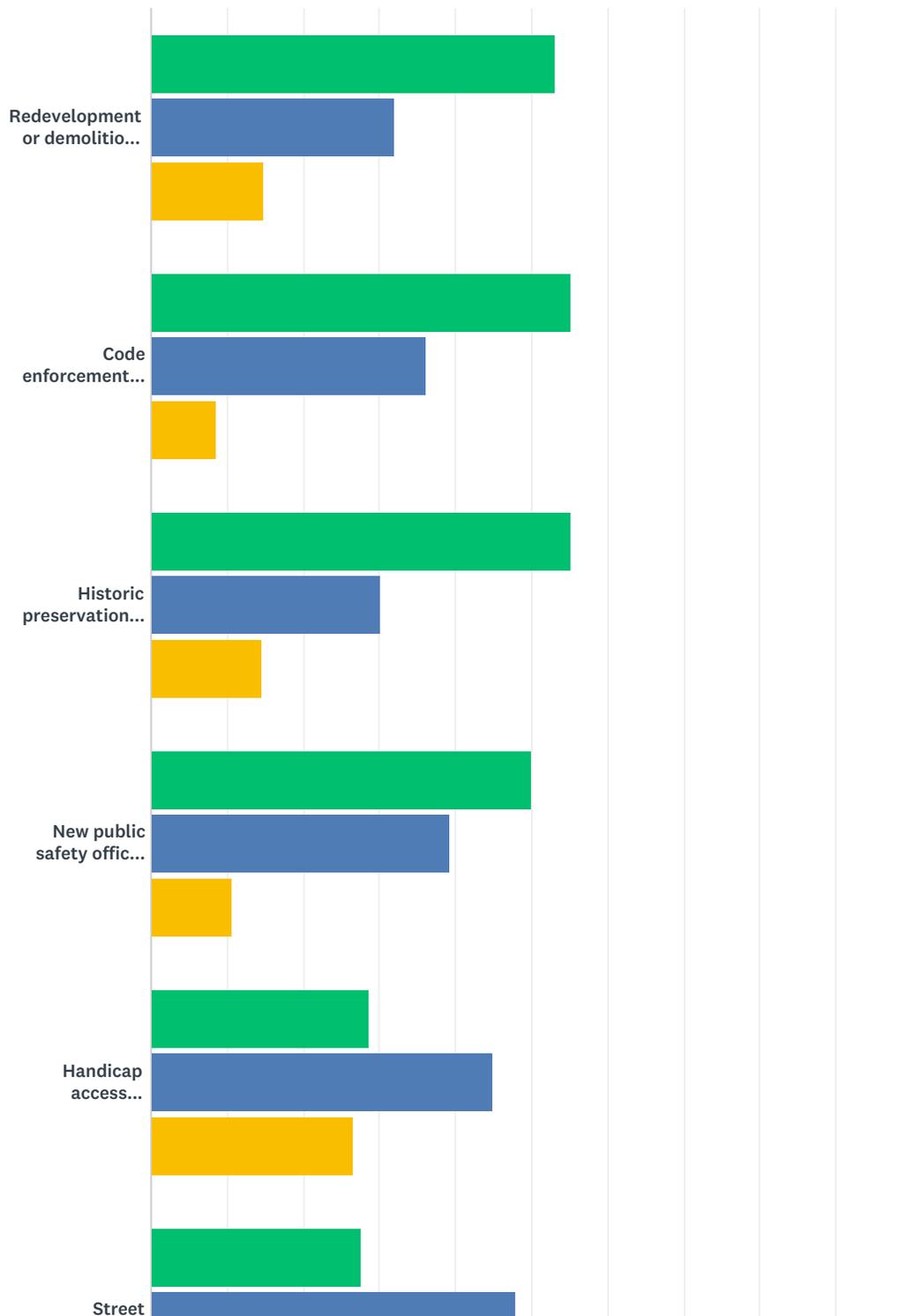
Answered: 101 Skipped: 69

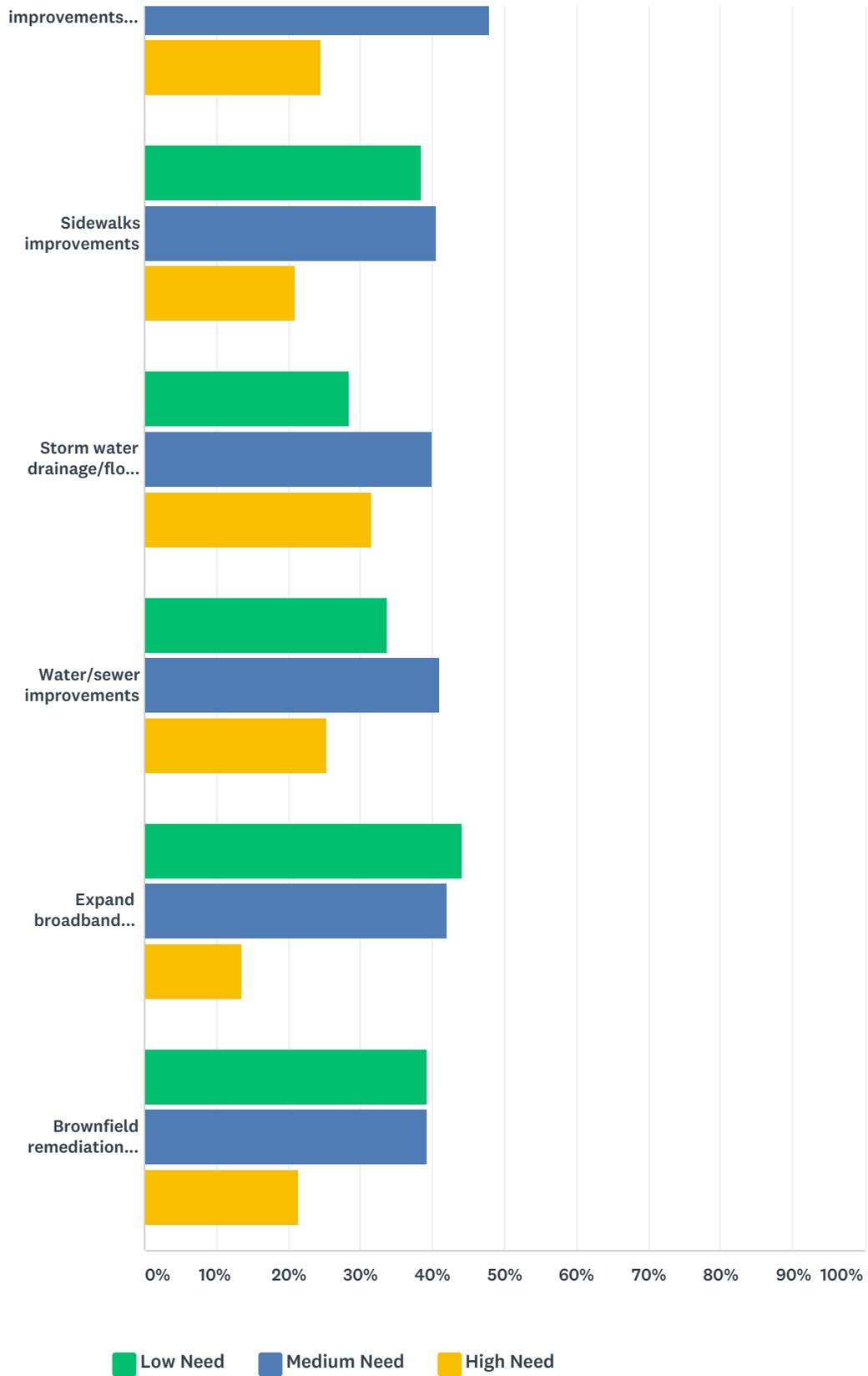


	LOW NEED	MEDIUM NEED	HIGH NEED	TOTAL	WEIGHTED AVERAGE
Outreach/counseling/referral services for persons experiencing homelessness	19.39% 19	37.76% 37	42.86% 42	98	2.23
Emergency food and clothing for persons experiencing homelessness	11.22% 11	45.92% 45	42.86% 42	98	2.32
Emergency shelter	13.00% 13	29.00% 29	58.00% 58	100	2.45
Permanent supportive housing	21.43% 21	38.78% 38	39.80% 39	98	2.18
Domestic violence shelter	9.00% 9	29.00% 29	62.00% 62	100	2.53
Employment training for persons experiencing homelessness	10.20% 10	39.80% 39	50.00% 49	98	2.40

Q13 Please rank the following needs on a scale ranging from Low Need (may be beneficial but federal funds should not be used for this purpose) to Medium Need (some federal funding and other sources of funding should be used for this purpose) to High Need (federal funding should be used for this purpose).

Answered: 98 Skipped: 72



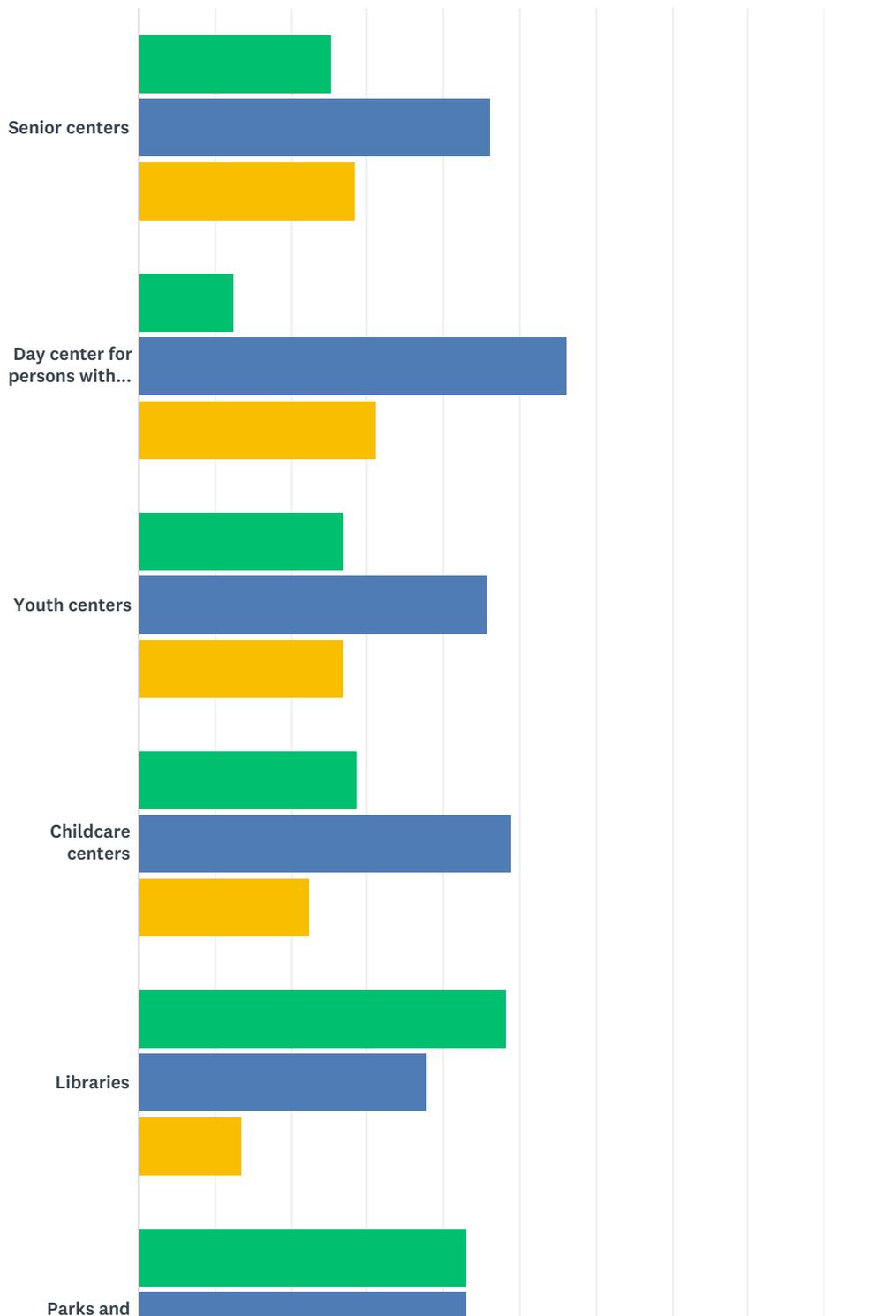


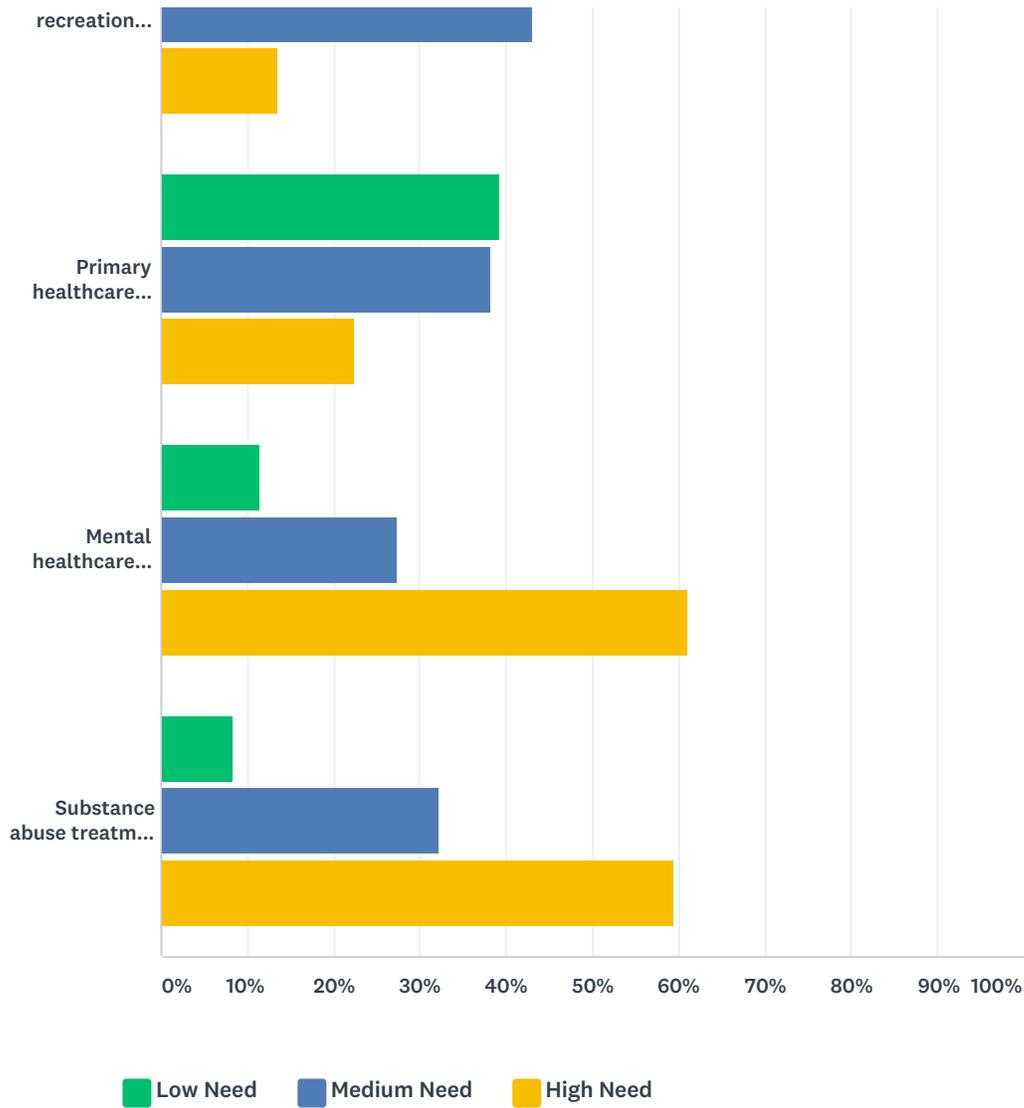
	LOW NEED	MEDIUM NEED	HIGH NEED	TOTAL	WEIGHTED AVERAGE
Redevelopment or demolition of abandoned commercial properties	53.19%	31.91%	14.89%	94	1.62
	50	30	14		

Code enforcement efforts for commercial properties	55.32% 52	36.17% 34	8.51% 8	94	1.53
Historic preservation efforts for commercial properties	55.21% 53	30.21% 29	14.58% 14	96	1.59
New public safety offices (fire, police, emergency management)	50.00% 47	39.36% 37	10.64% 10	94	1.61
Handicap access improvements	28.57% 28	44.90% 44	26.53% 26	98	1.98
Street improvements (repaving, curb cuts)	27.66% 26	47.87% 45	24.47% 23	94	1.97
Sidewalks improvements	38.54% 37	40.63% 39	20.83% 20	96	1.82
Storm water drainage/flooding improvements	28.42% 27	40.00% 38	31.58% 30	95	2.03
Water/sewer improvements	33.68% 32	41.05% 39	25.26% 24	95	1.92
Expand broadband (internet) access	44.21% 42	42.11% 40	13.68% 13	95	1.69
Brownfield remediation (brownfields are abandoned, idled, or under-used property where expansion or redevelopment is complicated by the presence or potential presence of environmental contamination)	39.36% 37	39.36% 37	21.28% 20	94	1.82

Q14 Please rank the following needs on a scale ranging from Low Need (may be beneficial but federal funds should not be used for this purpose) to Medium Need (some federal funding and other sources of funding should be used for this purpose) to High Need (federal funding should be used for this purpose).

Answered: 99 Skipped: 71

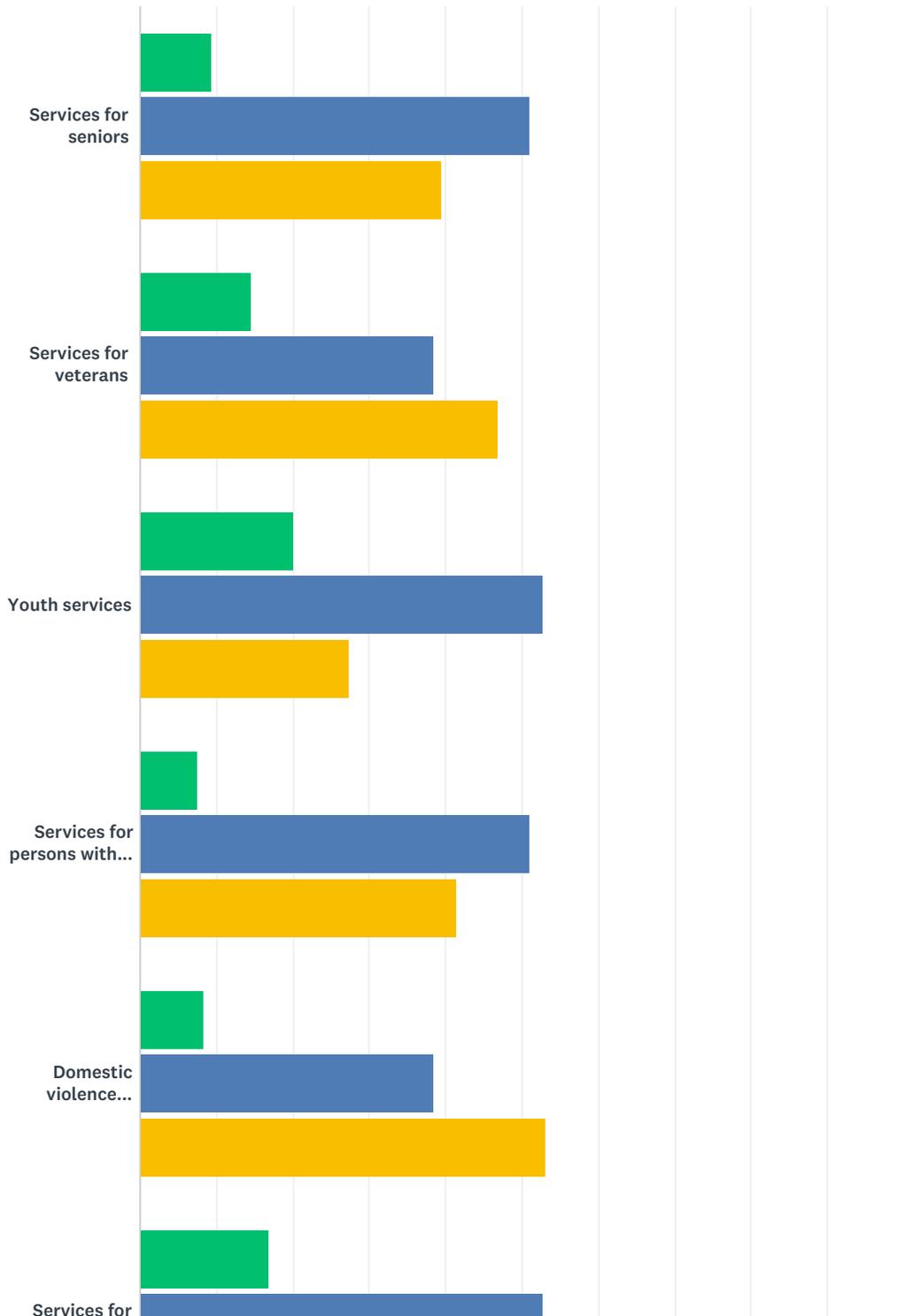


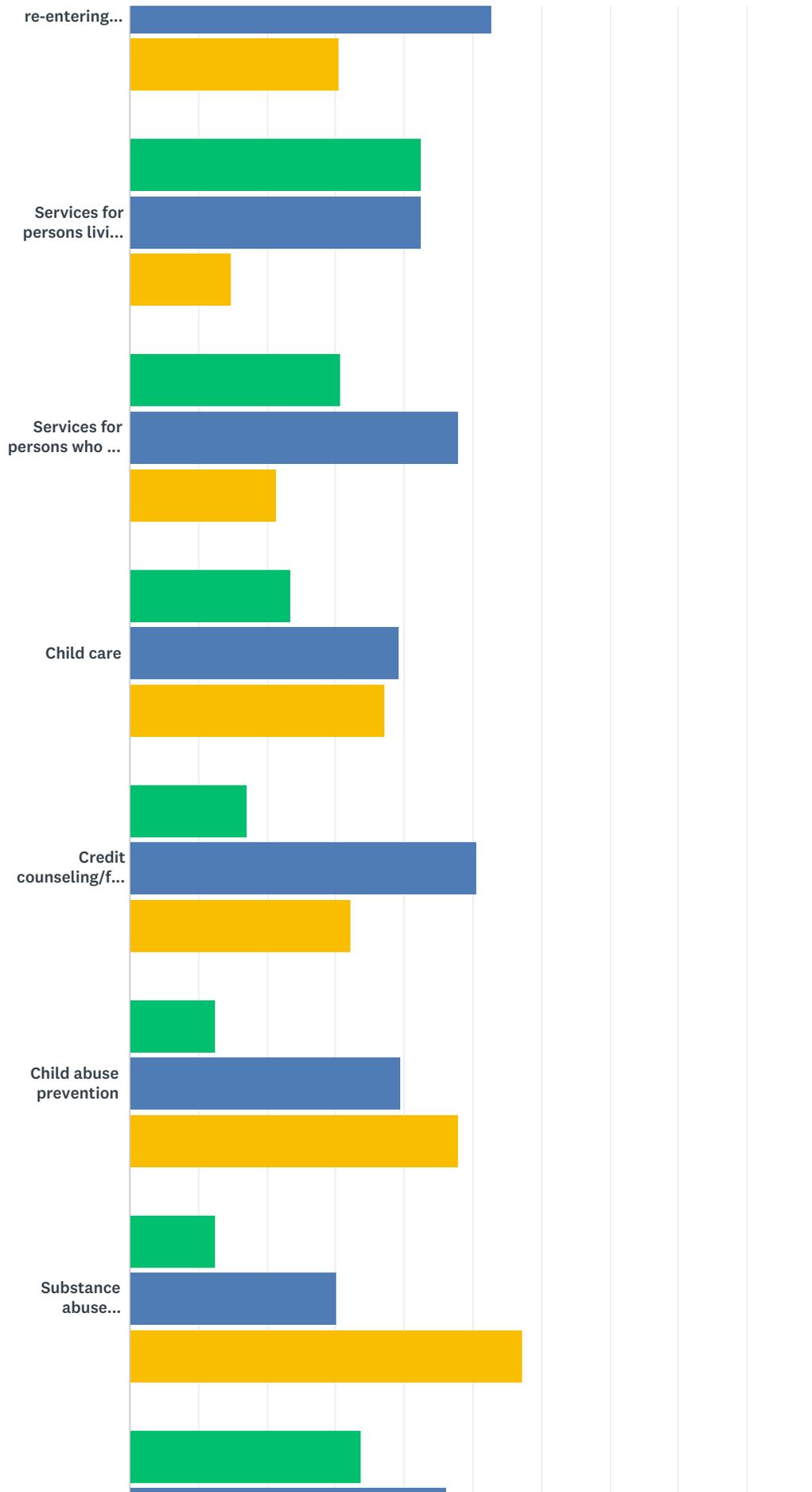


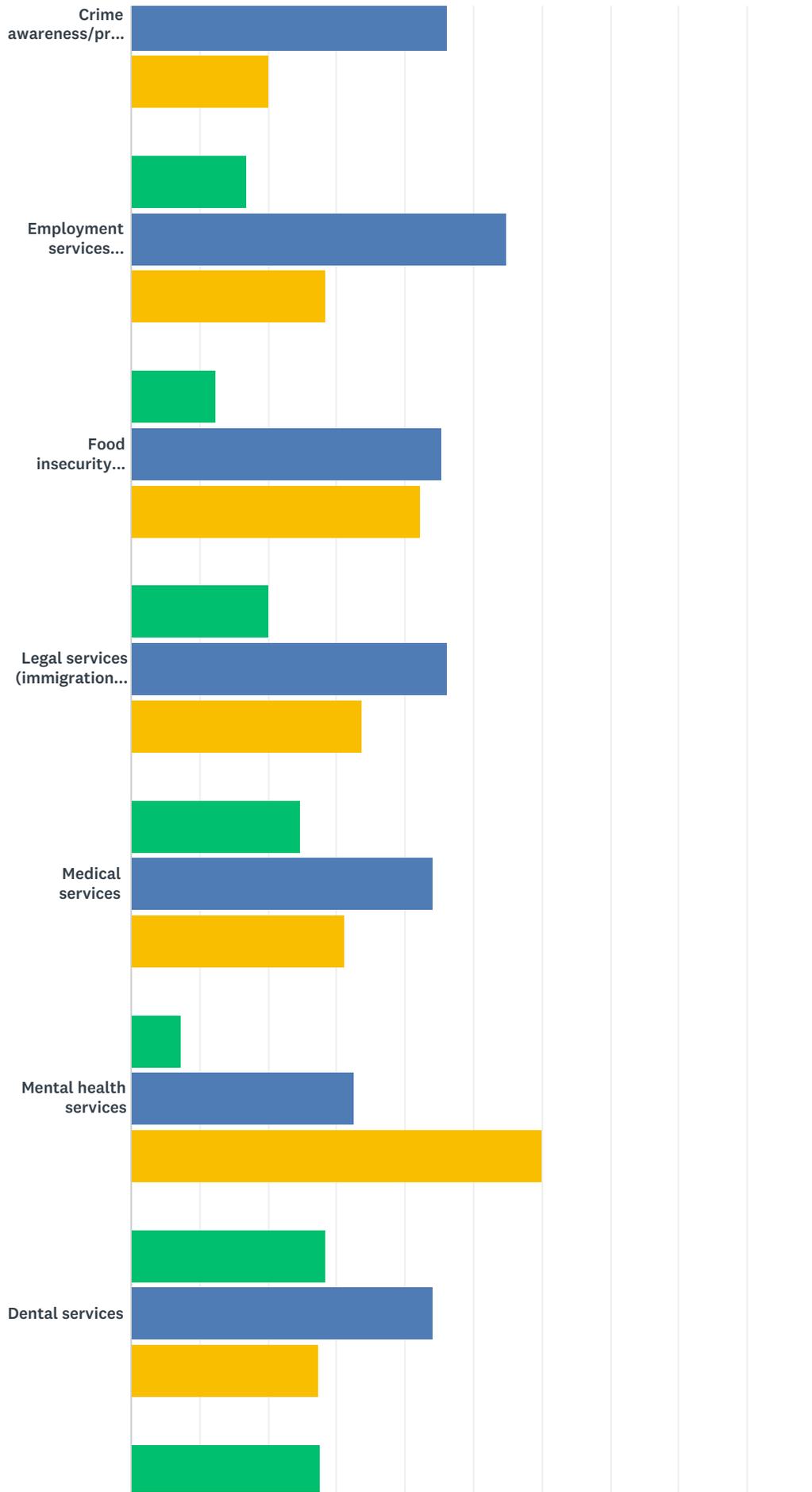
	LOW NEED	MEDIUM NEED	HIGH NEED	TOTAL	WEIGHTED AVERAGE
Senior centers	25.26% 24	46.32% 44	28.42% 27	95	2.03
Day center for persons with disabilities	12.50% 12	56.25% 54	31.25% 30	96	2.19
Youth centers	27.08% 26	45.83% 44	27.08% 26	96	2.00
Childcare centers	28.72% 27	48.94% 46	22.34% 21	94	1.94
Libraries	48.42% 46	37.89% 36	13.68% 13	95	1.65
Parks and recreation facilities	43.16% 41	43.16% 41	13.68% 13	95	1.71
Primary healthcare facilities	39.36% 37	38.30% 36	22.34% 21	94	1.83
Mental healthcare facilities	11.58% 11	27.37% 26	61.05% 58	95	2.49
Substance abuse treatment facilities	8.33% 8	32.29% 31	59.38% 57	96	2.51

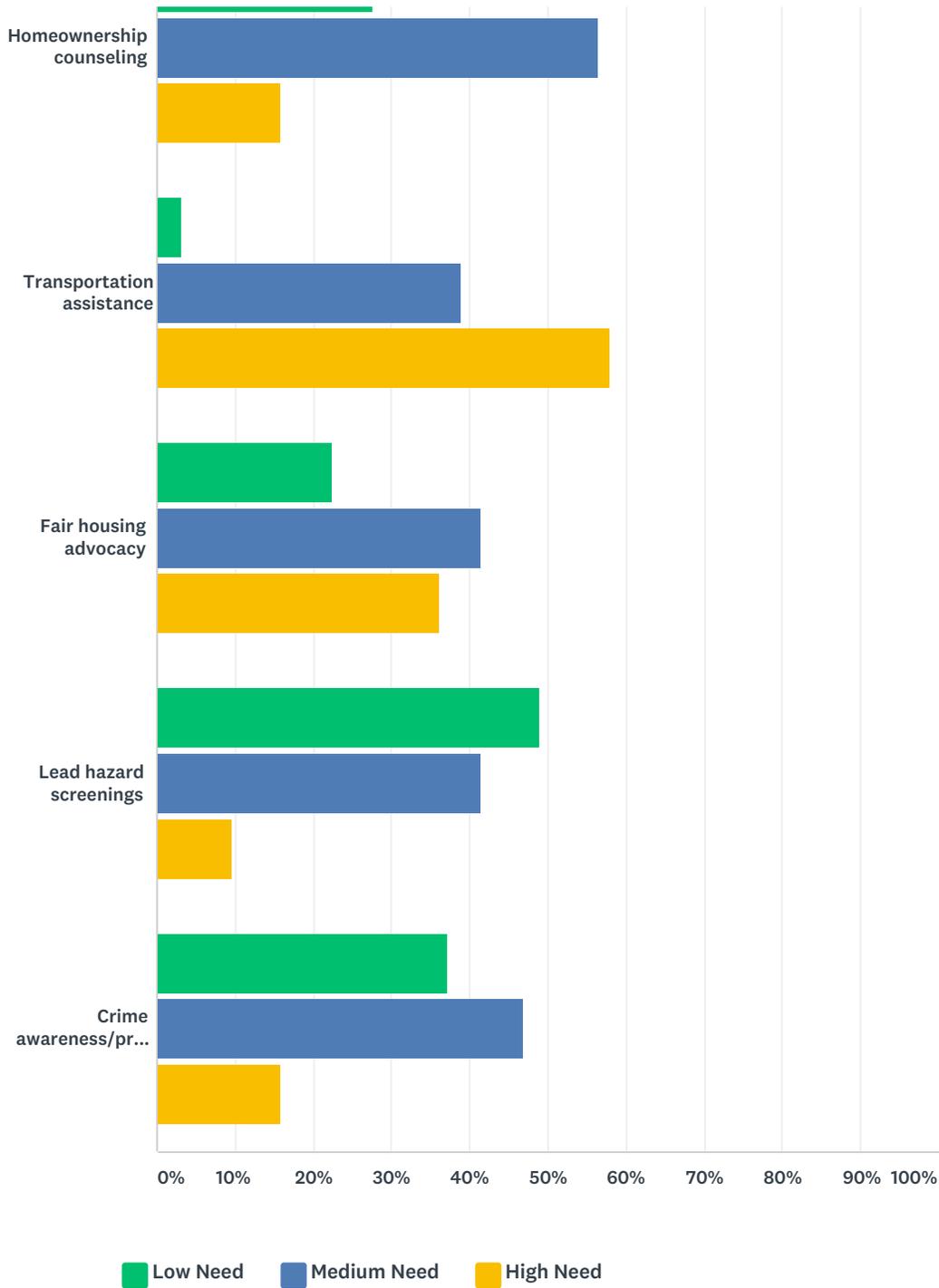
Q15 Please rank the following needs on a scale ranging from Low Need (may be beneficial but federal funds should not be used for this purpose) to Medium Need (some federal funding and other sources of funding should be used for this purpose) to High Need (federal funding should be used for this purpose).

Answered: 100 Skipped: 70







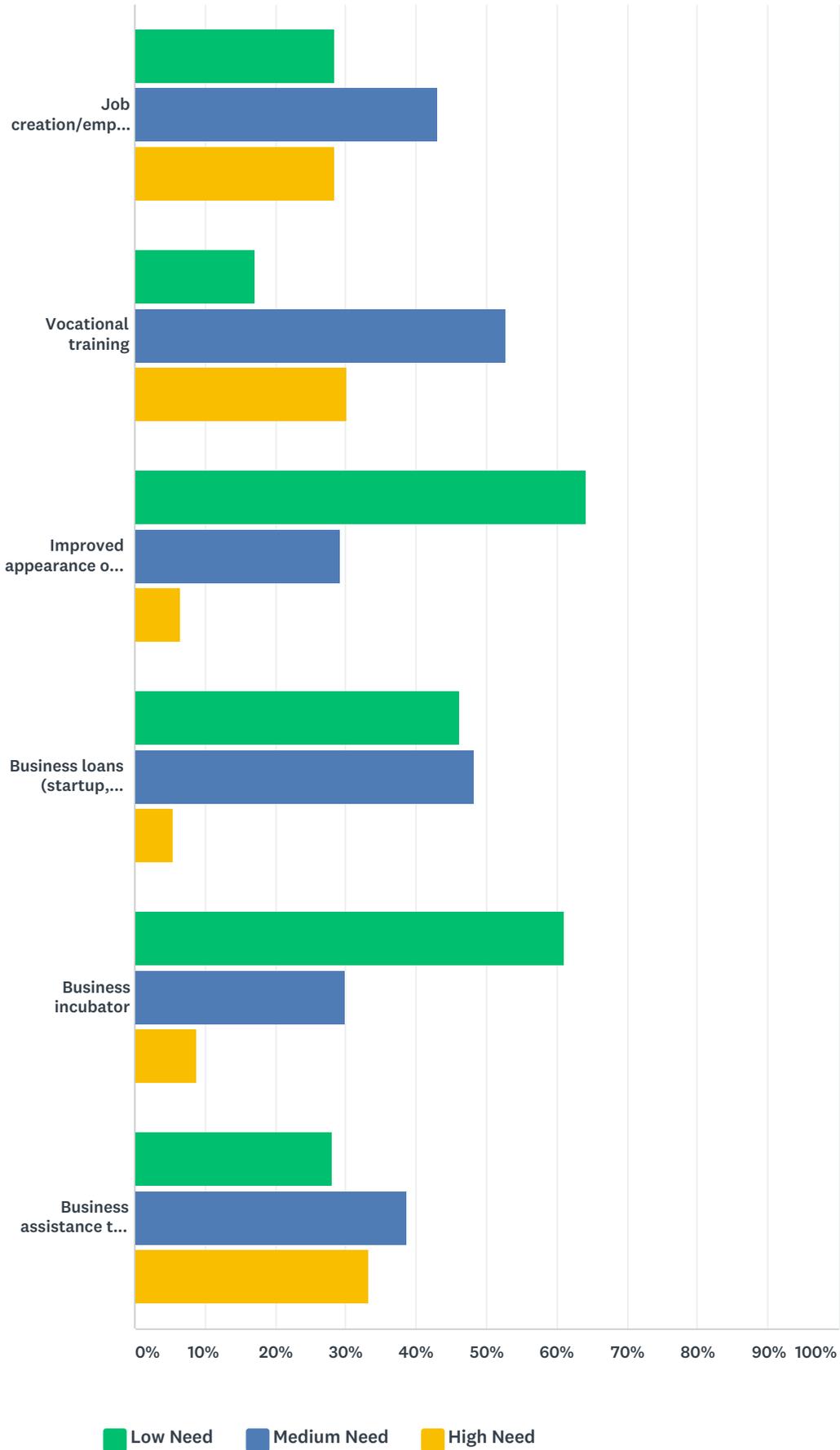


	LOW NEED	MEDIUM NEED	HIGH NEED	TOTAL	WEIGHTED AVERAGE
Services for seniors	9.38% 9	51.04% 49	39.58% 38	96	2.30
Services for veterans	14.58% 14	38.54% 37	46.88% 45	96	2.32
Youth services	20.00% 19	52.63% 50	27.37% 26	95	2.07
Services for persons with disabilities	7.45% 7	51.06% 48	41.49% 39	94	2.34

Domestic violence services	8.33% 8	38.54% 37	53.13% 51	96	2.45
Services for re-entering offenders	16.84% 16	52.63% 50	30.53% 29	95	2.14
Services for persons living with HIV/AIDS	42.55% 40	42.55% 40	14.89% 14	94	1.72
Services for persons who are illiterate	30.85% 29	47.87% 45	21.28% 20	94	1.90
Child care	23.40% 22	39.36% 37	37.23% 35	94	2.14
Credit counseling/financial management training	17.20% 16	50.54% 47	32.26% 30	93	2.15
Child abuse prevention	12.50% 12	39.58% 38	47.92% 46	96	2.35
Substance abuse treatment/services	12.50% 12	30.21% 29	57.29% 55	96	2.45
Crime awareness/prevention	33.68% 32	46.32% 44	20.00% 19	95	1.86
Employment services (referrals, employment fair)	16.84% 16	54.74% 52	28.42% 27	95	2.12
Food insecurity assistance programs	12.37% 12	45.36% 44	42.27% 41	97	2.30
Legal services (immigration, eviction, discrimination)	20.00% 19	46.32% 44	33.68% 32	95	2.14
Medical services	24.73% 23	44.09% 41	31.18% 29	93	2.06
Mental health services	7.37% 7	32.63% 31	60.00% 57	95	2.53
Dental services	28.42% 27	44.21% 42	27.37% 26	95	1.99
Homeownership counseling	27.66% 26	56.38% 53	15.96% 15	94	1.88
Transportation assistance	3.16% 3	38.95% 37	57.89% 55	95	2.55
Fair housing advocacy	22.34% 21	41.49% 39	36.17% 34	94	2.14
Lead hazard screenings	48.94% 46	41.49% 39	9.57% 9	94	1.61
Crime awareness/prevention	37.23% 35	46.81% 44	15.96% 15	94	1.79

Q16 Please rank the following needs on a scale ranging from Low Need (may be beneficial but federal funds should not be used for this purpose) to Medium Need (some federal funding and other sources of funding should be used for this purpose) to High Need (federal funding should be used for this purpose).

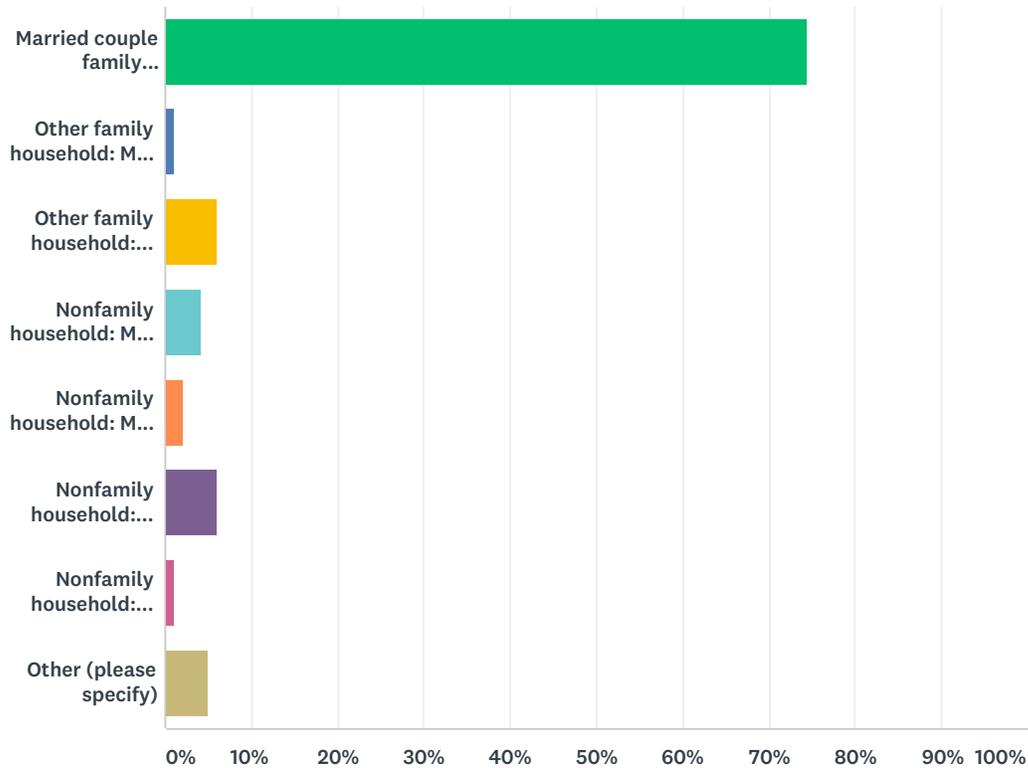
Answered: 95 Skipped: 75



	LOW NEED	MEDIUM NEED	HIGH NEED	TOTAL	WEIGHTED AVERAGE
Job creation/employer retention programs	28.42% 27	43.16% 41	28.42% 27	95	2.00
Vocational training	17.20% 16	52.69% 49	30.11% 28	93	2.13
Improved appearance of business districts	64.13% 59	29.35% 27	6.52% 6	92	1.42
Business loans (startup, expansion, acquisition)	46.24% 43	48.39% 45	5.38% 5	93	1.59
Business incubator	61.11% 55	30.00% 27	8.89% 8	90	1.48
Business assistance to provides access to fresh food in high need areas	27.96% 26	38.71% 36	33.33% 31	93	2.05

Q17 Which of the following best describes your household?

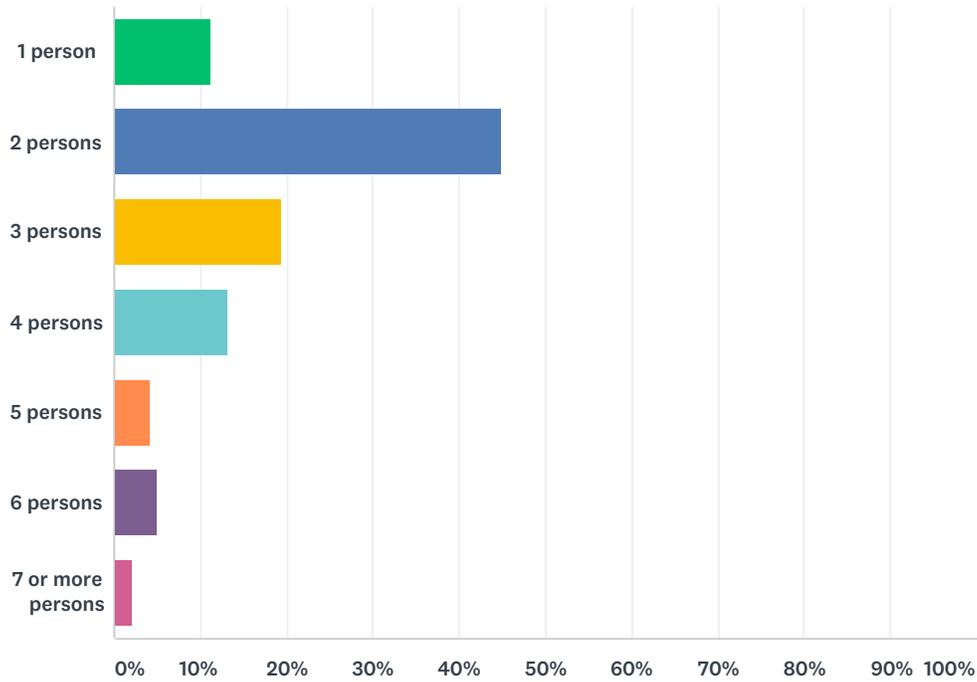
Answered: 98 Skipped: 72



ANSWER CHOICES	RESPONSES	
Married couple family household	74.49%	73
Other family household: Male householder, no wife present	1.02%	1
Other family household: Female householder, no husband present	6.12%	6
Nonfamily household: Male householder, living alone	4.08%	4
Nonfamily household: Male householder, not living alone	2.04%	2
Nonfamily household: Female householder, living alone	6.12%	6
Nonfamily household: Female householder, not living alone	1.02%	1
Other (please specify)	5.10%	5
TOTAL		98

Q18 How many persons live in your household (including yourself)?

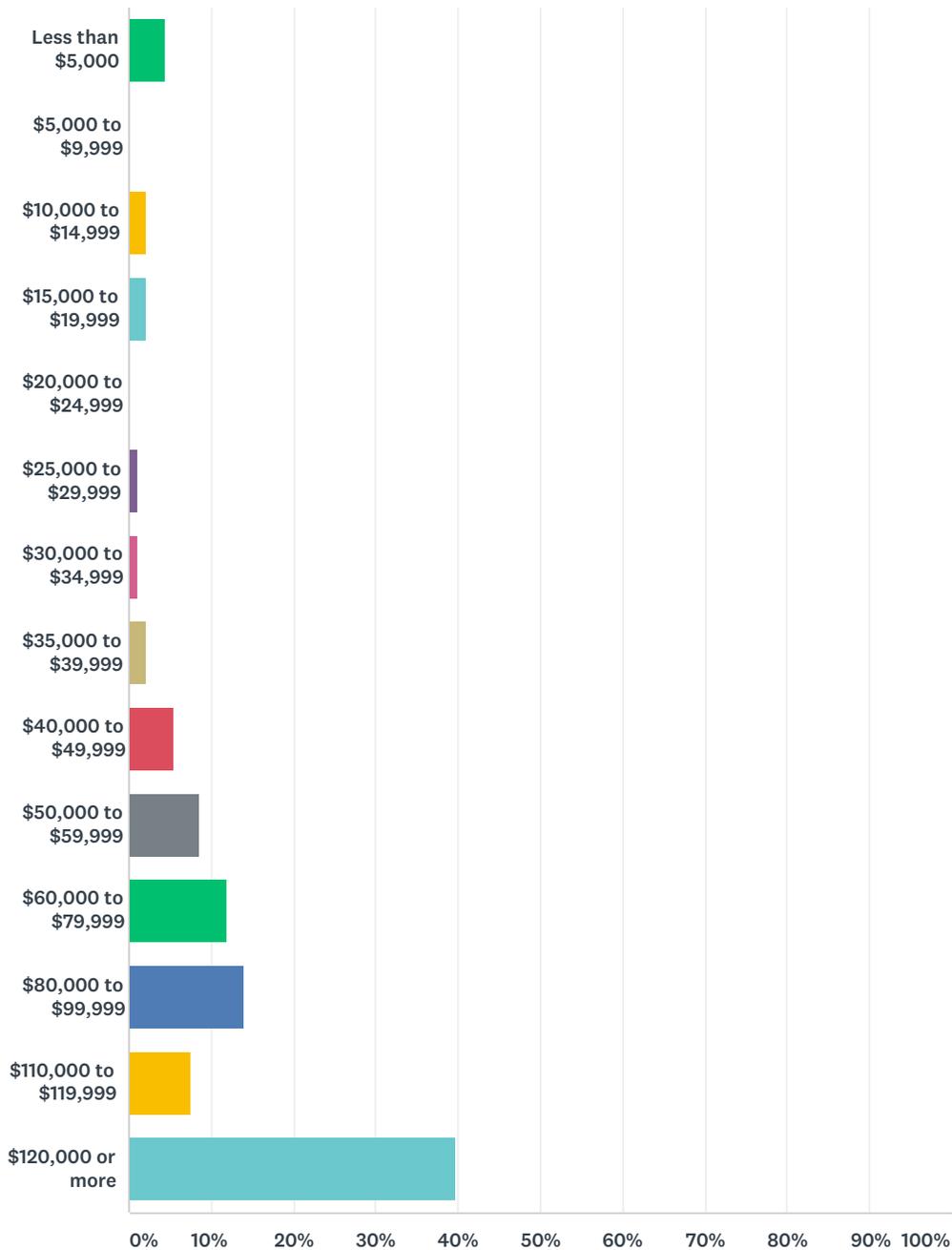
Answered: 98 Skipped: 72



ANSWER CHOICES	RESPONSES	
1 person	11.22%	11
2 persons	44.90%	44
3 persons	19.39%	19
4 persons	13.27%	13
5 persons	4.08%	4
6 persons	5.10%	5
7 or more persons	2.04%	2
TOTAL		98

Q19 What was your total household income (include income from all individuals in the household) before taxes during the past 12 months?

Answered: 93 Skipped: 77

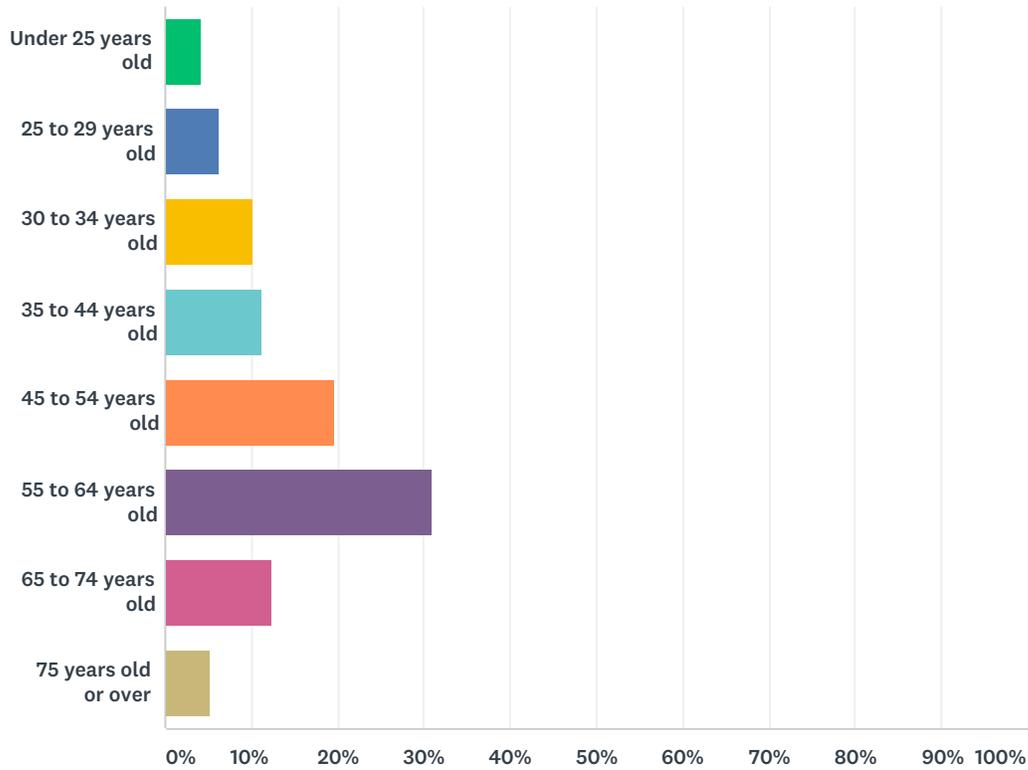


ANSWER CHOICES	RESPONSES	
Less than \$5,000	4.30%	4
\$5,000 to \$9,999	0.00%	0
\$10,000 to \$14,999	2.15%	2
\$15,000 to \$19,999	2.15%	2

\$20,000 to \$24,999	0.00%	0
\$25,000 to \$29,999	1.08%	1
\$30,000 to \$34,999	1.08%	1
\$35,000 to \$39,999	2.15%	2
\$40,000 to \$49,999	5.38%	5
\$50,000 to \$59,999	8.60%	8
\$60,000 to \$79,999	11.83%	11
\$80,000 to \$99,999	13.98%	13
\$110,000 to \$119,999	7.53%	7
\$120,000 or more	39.78%	37
TOTAL		93

Q20 Which of the following best describes your age?

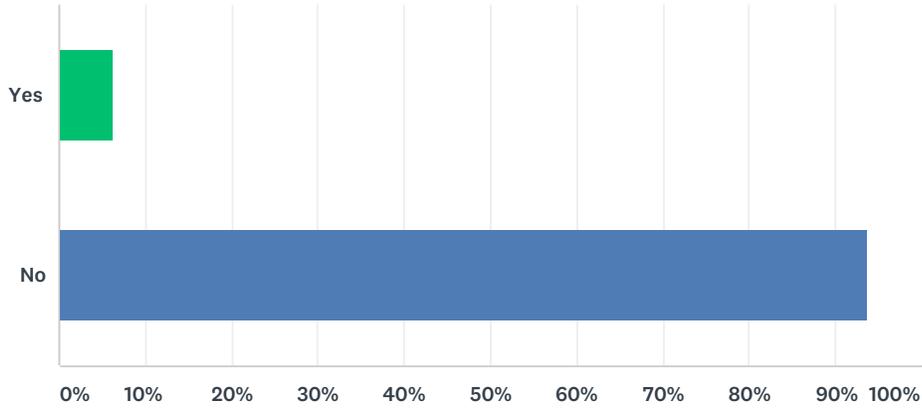
Answered: 97 Skipped: 73



ANSWER CHOICES	RESPONSES
Under 25 years old	4.12% 4
25 to 29 years old	6.19% 6
30 to 34 years old	10.31% 10
35 to 44 years old	11.34% 11
45 to 54 years old	19.59% 19
55 to 64 years old	30.93% 30
65 to 74 years old	12.37% 12
75 years old or over	5.15% 5
TOTAL	97

Q21 Are you Hispanic?

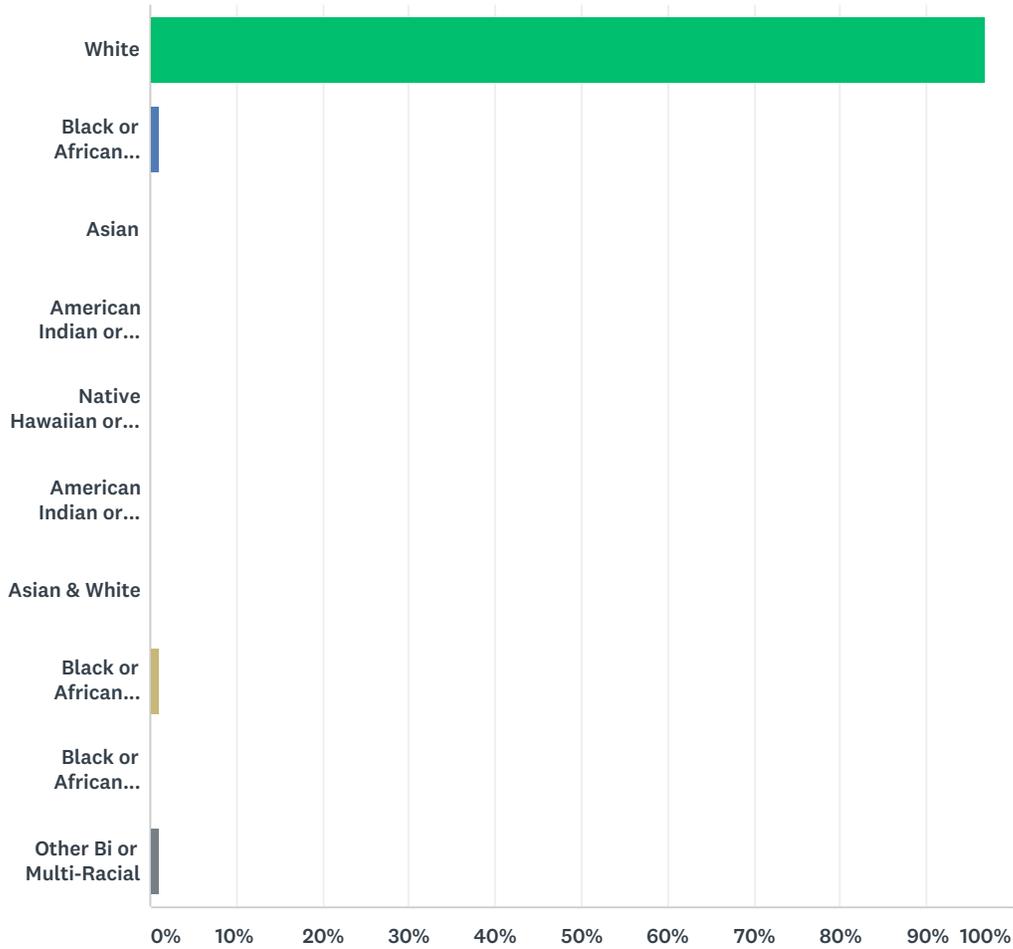
Answered: 97 Skipped: 73



ANSWER CHOICES	RESPONSES	
Yes	6.19%	6
No	93.81%	91
TOTAL		97

Q22 Are you _____?

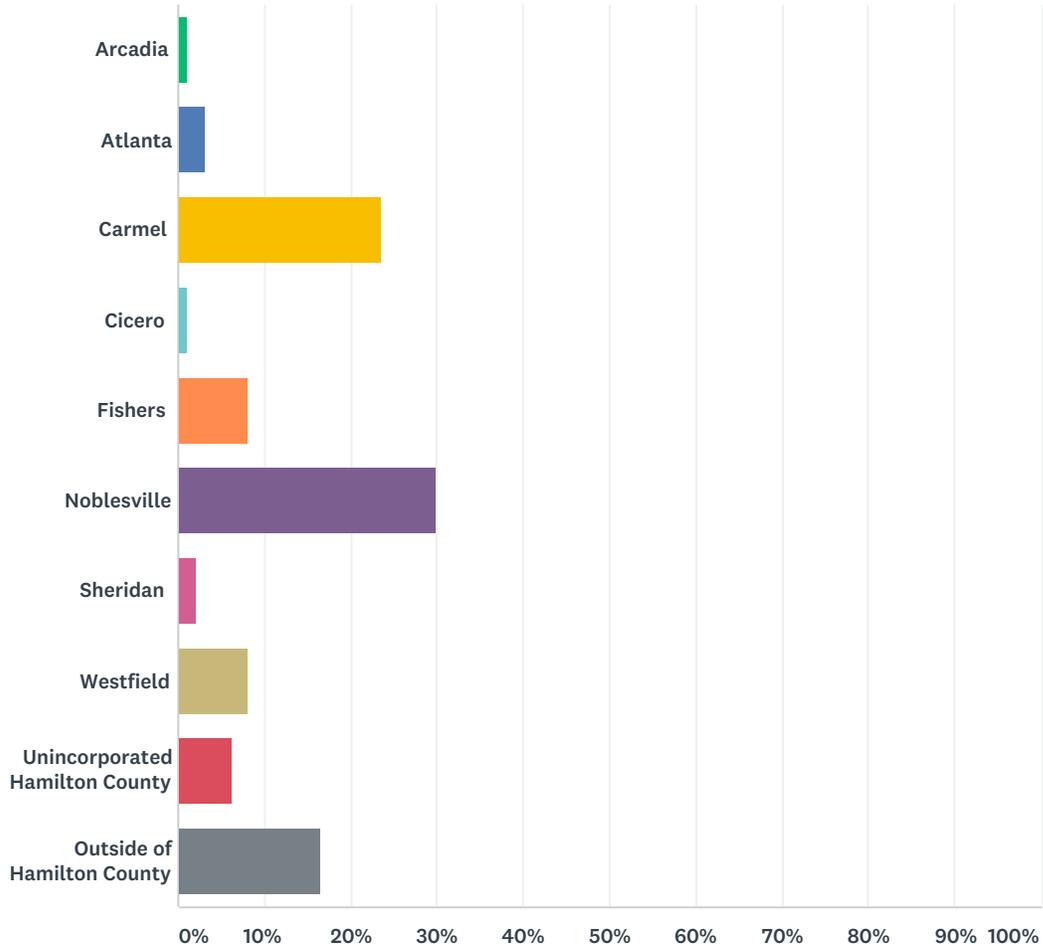
Answered: 96 Skipped: 74



ANSWER CHOICES	RESPONSES	
White	96.88%	93
Black or African American	1.04%	1
Asian	0.00%	0
American Indian or Alaskan Native (including Central/South American)	0.00%	0
Native Hawaiian or other Pacific Islander	0.00%	0
American Indian or Alaskan Native & White	0.00%	0
Asian & White	0.00%	0
Black or African American & White	1.04%	1
Black or African American & American Indian or Alaskan Native	0.00%	0
Other Bi or Multi-Racial	1.04%	1
TOTAL		96

Q23 Where do you currently reside?

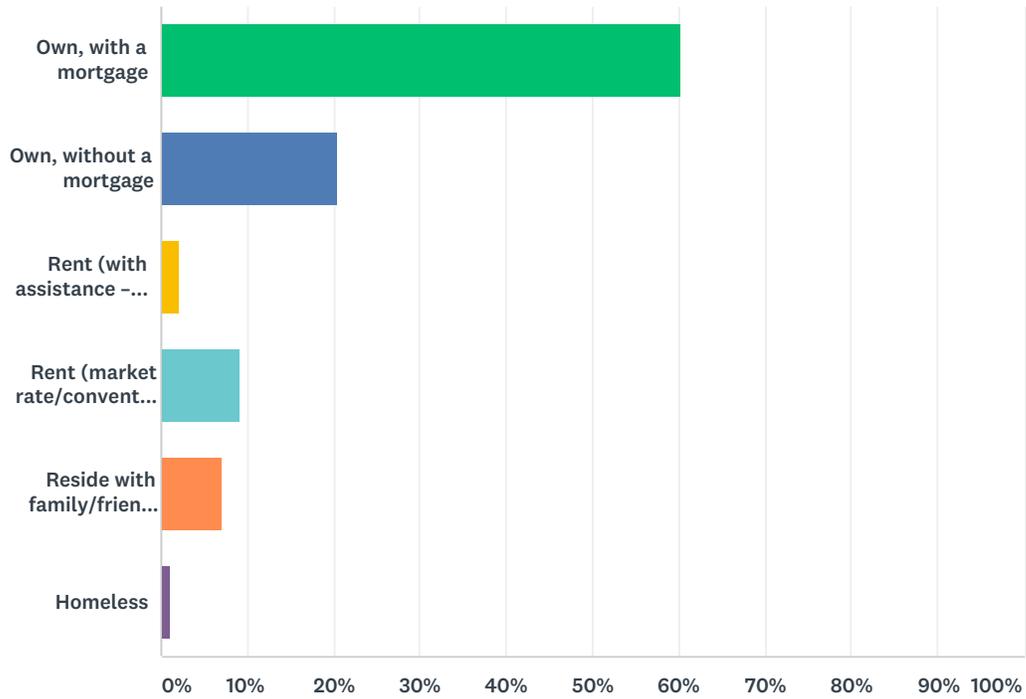
Answered: 97 Skipped: 73



ANSWER CHOICES	RESPONSES	
Arcadia	1.03%	1
Atlanta	3.09%	3
Carmel	23.71%	23
Cicero	1.03%	1
Fishers	8.25%	8
Noblesville	29.90%	29
Sheridan	2.06%	2
Westfield	8.25%	8
Unincorporated Hamilton County	6.19%	6
Outside of Hamilton County	16.49%	16
TOTAL		97

Q24 Which of the following best describes your housing situation?

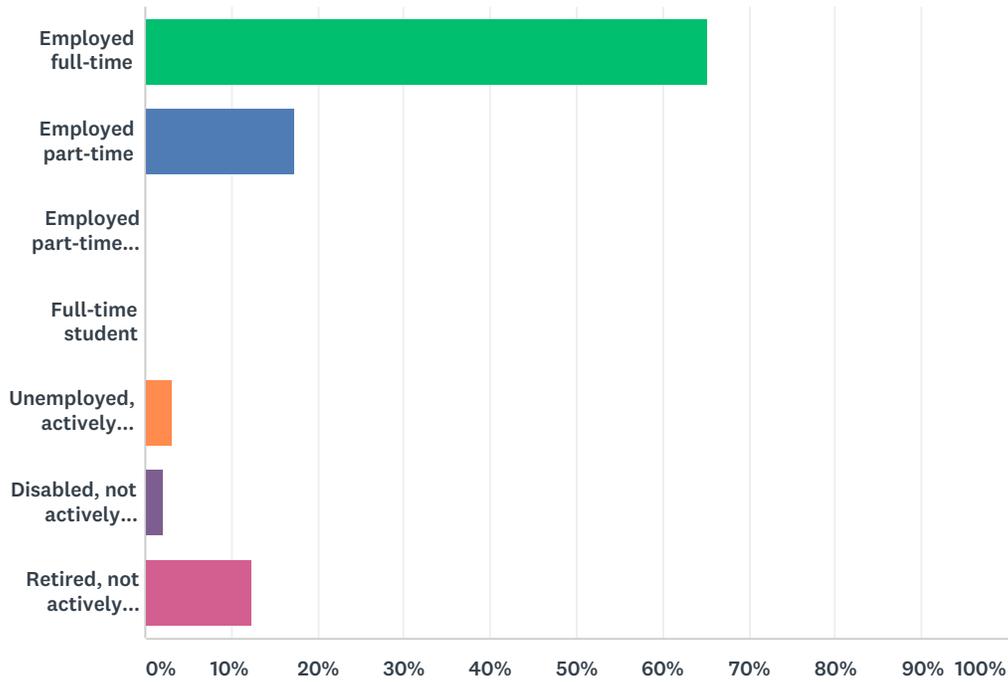
Answered: 98 Skipped: 72



ANSWER CHOICES	RESPONSES	
Own, with a mortgage	60.20%	59
Own, without a mortgage	20.41%	20
Rent (with assistance – Section 8, Public Housing, Low Income Housing Tax Credit)	2.04%	2
Rent (market rate/conventional unit)	9.18%	9
Reside with family/friends (no rent paid)	7.14%	7
Homeless	1.02%	1
TOTAL		98

Q25 Which of the following best describes your employment status?

Answered: 98 Skipped: 72



ANSWER CHOICES	RESPONSES	
Employed full-time	65.31%	64
Employed part-time	17.35%	17
Employed part-time (student)	0.00%	0
Full-time student	0.00%	0
Unemployed, actively looking for work	3.06%	3
Disabled, not actively seeking work	2.04%	2
Retired, not actively seeking work	12.24%	12
TOTAL		98

Q26 This concludes the survey. If you have any additional comments that you would like to share please do so in the space below.

Answered: 12 Skipped: 158